



## 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:

**Thursday | June 20, 2024 | 10:00 a.m.**  
**VIA REMOTE ACCESS: 1-646-741-5292**  
**MEETING ID/ PARTICIPANT CODE: 112 733 5555**  
**All meetings are streamed live at [www.massgaming.com](http://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](http://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 - #522**

1. Call to Order – Jordan Maynard, Interim Chair
  
2. Meeting Minutes
  - a. December 6, 2022 **VOTE**
  - b. December 7, 2022 **VOTE**
  
3. Administrative Update – Dean Serpa, Executive Director
  
4. Legislative Update – Commissioner Brad Hill
  
5. Racing – Dr. Alex Lightbown, Director of Racing and Chief Veterinarian
  - a. Jockey's Guild Recognition – Mindy Coleman, Attorney for the Jockey's Guild **VOTE**



Massachusetts Gaming Commission

6. Legal – Todd Grossman, General Counsel
  - a. FBT Everett Realty, LLC v. Massachusetts Gaming Commission
    - I. Executive Session **VOTE**  
 The Commission anticipates that it will meet in executive session in accordance with G.L. c.30A, §21(a)(3) to discuss strategy with respect to FBT Everett Realty, LLC v. Massachusetts Gaming Commission, as discussion at an open meeting may have a detrimental effect on the litigating position of the Commission.
  - b. Executive Session Minutes
    - I. April 6, 2023 **VOTE**
    - II. February 15, 2024 **VOTE**
    - III. February 29, 2024 **VOTE**
    - IV. Executive Session  
 The Commission anticipates that it will meet in executive session to review minutes from previous executive sessions, as their discussion at an open meeting may frustrate the intended purpose for which the executive sessions were convened pursuant to G.L. c. 30A, §21(a)(7) and G.L. c. 4, §7(26)(f) (April 6, 2023); and G.L. c. 30A, §21(a)(7) and G.L. c.23K, §21(a)(7) (February 15, 2024, and February 29, 2024). **VOTE**
  
7. Research and Responsible Gaming – Mark Vander Linden, Director of Research and Responsible Gaming
  - a. Presentation of report, “Impacts of Advertising on Gambling Behavior in Massachusetts” – Rachel Volberg, Research Professor at University of Massachusetts Amherst; Principal Investigator, Social and Economic Impacts of Gambling in Massachusetts (SEIGMA)
  - b. Proposed FY25 Gaming Research Agenda **VOTE**
  
8. Finance – Derek Lennon, Chief Financial and Accounting Officer
  - a. FY25 Budget Approval – Commissioner Brad Hill; Dean Serpa, Executive Director; Derek Lennon, Chief Financial and Accounting Officer; John Scully, Finance and Budget Office Manager; Doug O’Donnell, Revenue Manager **VOTE**
  
9. Legal – Todd Grossman, General Counsel
  - a. Update regarding the Mashpee Wampanoag Litigation – Justin Stempeck, Deputy General Counsel



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10. Investigations and Enforcement Bureau – Caitlin Monahan, Director of Investigations and Enforcement Bureau
- a. Continued discussion regarding noncompliance matter related to Temporary Category 3 Sports Wagering Licensee Penn Sports Interactive, LLC, including next steps. Alleged noncompliance relates to misleading advertising in violation of 205 CMR 256.04(6)(c) and 205 CMR 256.04(6)(d) – Zac Mercer, Enforcement Counsel

11. Sports Wagering Division – Bruce Band, Director of Sports Wagering
- a. Approval of House Rules: Bally’s **VOTE**
  - b. Event Catalog Addition Request: Tomorrow’s Golf League (TGL)
    - I. Discussion of Tomorrow’s Golf League Categorization – Justin Stempeck, Deputy General Counsel
    - II. Decision on Event Catalog Addition Request – Andrew Steffen, Sports Wagering Operations Manager **VOTE**
  - b. Wager Limitation by Operator Follow Up Discussion

12. Communications Division – Tom Mills, Chief of Communications
- a. Review of Designs for MGC Seal of Approval **VOTE**

13. Commissioner Updates

14. 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](http://www.massgaming.com) and emailed to [regs@sec.state.ma.us](mailto:regs@sec.state.ma.us). Posted to Website: June 17, 2024 | 10:00 a.m. EST

June 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](mailto:Grace.Robinson@massgaming.gov).*



Massachusetts Gaming Commission



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## Massachusetts Gaming Commission Meeting Minutes

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**Date/Time:** December 6, 2022, 10:00 a.m.  
**Place:** Massachusetts Gaming Commission

VIA CONFERENCE CALL NUMBER: 1-646-741-5292  
PARTICIPANT CODE: 112 251 8495

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

### **Commissioners Present:**

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

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

Chair Judd-Stein called to order the 406<sup>th</sup> Public Meeting of the Massachusetts Gaming Commission ("Commission"). Roll call attendance was conducted, and all five Commissioners were present for the meeting.

Chair Judd-Stein began the meeting by stating that the Commission's principal responsibility in reviewing the sports wagering applications was to ensure the integrity of the gaming industry in Massachusetts. She stated that the Commission would maintain strict oversight of gaming establishments and sports wagering operators. She highlighted that awarding a sports wagering license was a privilege and that operators would be held to the highest standards of compliance on a continuing basis. She stated that the Commission's mission permits the creation of a fair, transparent process that engendered the confidence of the public and maximized the benefits to the Commonwealth. She then briefly explained the agenda for this public meeting.

#### 2. [Legal Framework Relative to the Award of a Sports Wagering License](#) (06:03)

General Counsel Todd Grossman stated that this meeting was the Commission's opportunity to evaluate the application for a category one sports wagering license submitted by Plainville

Gaming Redevelopment, LLC, (d/b/a Plainridge Park Casino) (“PPC”). He explained that under G.L. Chapter 23N, § 6(b)(1), the Commission shall issue a category one sports wagering license to any holder of a gaming license under G.L. Chapter 23K, provided that any holder of a category one sports wagering license shall not receive a category two sports wagering license.

General Counsel Grossman stated that PPC held a gaming license under G.L. Chapter 23K. He stated that category one sports wagering license was defined in G.L. Chapter 23N, § 3 as a license issued by the Commission that permits in-person sports wagering at a gaming establishment; and not more than two individually branded mobile applications or digital platforms approved by the Commission. He stated that entities operating mobile platforms would be required to have a category three sports wagering license.

General Counsel Grossman stated that 205 CMR 218 set out the application requirements, standards, and procedures. He stated that the Commission had convened a meeting to receive public feedback on the category one applications on December 5, 2022. He explained that the regulation set out factors and considerations for the Commission to analyze in the evaluation process, but that the regulations did not set out a particular order to review factors nor did the regulation assign particular weight to the factors. He stated that the Commission may require that the applicant provide additional information or documents that the Commission deemed appropriate.

General Counsel Grossman noted that the evaluation of this application was being conducted in public and that all deliberations made by the Commission must take place in public. He stated that G.L. Chapter 30A, § 21(a)(7) allowed the Commission to move into executive session to comply with or act under the authority of any general law, such as G.L. Chapter 23N, § 6(i) regarding competitively sensitive information submitted in the course of the application process. He stated that if the Commission requested answers pertaining to competitively sensitive information, the applicant could request to move the meeting to executive session.

General Counsel Grossman stated that any finding the Commission makes must be backed by substantial evidence, and that the heightened standard of clear and convincing evidence applied to suitability pursuant to 205 CMR 215.

General Counsel Grossman stated that the factors the Commission would evaluate would be: the applicant’s experience and expertise related to sports wagering; the economic impact and benefits to the Commonwealth; the applicant’s proposed measures related to responsible gaming; the description of the applicant’s willingness to foster racial, ethnic, and gender diversity, equity, and inclusion (“DEI”); the technology the applicant intends to use in operation; suitability of the applicant and qualifiers; and any other appropriate factor in the Commission’s discretion.

General Counsel Grossman stated that the Commission could determine temporary or durable findings of suitability, but that no preliminary finding needed to be entered. He noted that the Commission could use any information received pursuant to G.L. Chapter 23K, G.L. Chapter 128A, G.L. Chapter 128C, or information from other jurisdictions where an operator was licensed to operate. He stated that additional conditions could be placed on a license pursuant to

205 CMR 220. General Counsel Grossman noted that an operator would also require an operations certificate before they could commence sports wagering operations.

Chair Judd-Stein sought further clarification regarding the description of suitability. General Counsel Grossman explained that category one applicants who hold gaming licenses had already submitted themselves to comprehensive background investigations and were deemed suitable under the gaming regulations. He stated that based upon this fact, the Commission may find that the applicant was suitable under G.L. Chapter 23N and award a durable finding of suitability. He stated that in contrast, the Commission could impose a preliminary finding of suitability which affords the IEB time to conduct a comprehensive background check of the applicants. He stated that a finding of preliminary suitability would allow a temporary sports wagering license to be awarded, and that a full investigation would follow.

### 3. Presentation of Application for Category 1 Sports Wagering Operator License Submitted by PPC in Accordance with 205 CMR 218.06(3) (28:39)

PPC's General Manager North Grounsell explained that PPC was part of Penn Entertainment ("Penn"). He stated that Penn had forty-three properties across twenty states and operated twenty-five retail sportsbooks. He added that Penn offered online sports wagering in fifteen jurisdictions, and that PPC had experience and expertise at a local level and across the company.

Mr. Grounsell stated that as of December 21, 2021, Penn had twenty-four retail sports wagering locations in ten states that had produced a handle of \$775 million and \$85 million in gross gaming revenue. He stated that PPC's estimates regarding the potential handle in Massachusetts were included in the unredacted version of the application.

Mr. Grounsell explained that if sports wagering was approved at PPC, PPC would then contract with Penn Sports Interactive ("PSI"), a wholly owned subsidiary of Penn Interactive and its parent company Penn. He stated that PSI would provide some key services, but that PPC would be operating the sportsbook.

Mr. Grounsell explained that PPC would initially open a temporary sportsbook near the Revolution Lounge with five tellers and eighteen kiosks. He noted that all kiosks would be located on the gaming floor and not in the horseracing area. He stated that Flutie's Sports Bar would soon be converted to a Barstool-branded sportsbook and restaurant. He added that this area was beyond the security podiums; and would require all patrons to be over the age of twenty-one to enter.

Mr. Grounsell stated that the sportsbook's marketing would be integrated with Penn's MyChoice loyalty program. He stated that there would be approximately ten-to-fifteen employees for the sportsbook and thirty-seven-to-forty-five employees in the restaurant area. He noted that staff would be added in proportion to business volume.

Mr. Grounsell stated that PPC planned to offer wagering on an estimated 5,000 wager markets and incorporate more than 1,000 domestic and international sports leagues across forty-five

sports. He stated that PPC had a history of commitment to responsible gaming and that PPC continued to implement the Commission-approved responsible gaming programs and support local GameSense advisors. He noted that PPC had an “exclude one, exclude all” policy, where any patron excluded from one of Penn’s properties would be excluded from all of Penn’s properties. He stated that Penn’s exclusion policy did not differentiate between types of gaming.

Mr. Grounsell stated that responsible gaming committees existed at both corporate and property levels. He stated that employees were trained regarding responsible gaming and regularly received refresher training. He stated that PPC offered self-exclusion, financial restrictions, and limitations setting in both their retail and online settings. He stated that PPC would continue to use responsible gaming language and follow the American Gaming Association’s (“AGA”) code of conduct for responsible gaming.

Mr. Grounsell stated that all newly hired team members receive an orientation that covers the company’s history, background, and values and includes training in guest services, work policies, and department specific training. He stated that PPC had an emerging leaders’ program for team members interested in pursuing management opportunities, and that PPC participated in job fairs.

Mr. Grounsell explained that PPC had diversity employment goals of 15% diverse employees, 2% veteran employees, 50% women employees, and 35% local employees. He stated that PPC currently had 24% diverse employees, 5% veteran employees, 43% women employees and 35% local employees. He stated that the percentage of women team members was likely to increase with the opening of the sports bar. He noted that the diversity levels in management also exceeded these goals. He stated that Penn had exceeded its supplier diversity goals with spending on 12% women-owned business enterprises, 8% minority-owned business enterprises, and 9% veteran-owned business-enterprises

Mr. Grounsell stated that Penn was committed to DEI and had an annual diversity scholarship fund with forty-seven recipients. He stated that in 2021 and 2022, Penn was ranked first on the Forbes list of “America’s Best Employers for Diversity”. He reported that Penn had implemented corporate policies, such as the supplier diversity initiative, to make DEI a priority. He noted that Penn also had the small business incubator program that onboarded minority businesses and assisted them in growing from local suppliers to national suppliers.

Mr. Grounsell explained that Penn’s lease adjusted net debt leverage was well below industry standard. He stated that Penn had \$2.6 billion in liquidity as of its most recently reported period. He explained that historically, Penn performed better than the Las Vegas Strip following the 2008 downturn in the economy. He stated that PPC had appreciated its relationship with the Commission, the Commonwealth, and the local and surrounding communities for the past seven years.

#### [4. Presentations and Analysis Relevant to Review and Evaluation of Application for Category 1 Sports Wagering Operator License \(1:14:24\)](#)

a. Technical Components

Chair Judd-Stein provided an initial overview of GLI. She explained that GLI was the first company to develop and set gaming technical standards, which are now considered an industry benchmark. She stated that GLI continued to innovate standards; and that regulators relied upon these standards to preserve the integrity of the industry. She introduced GLI's Senior Vice President of Government Relations, Kevin Mullally and GLI's Director of Client Solutions, Joe Bunevith.

Mr. Mullally stated that the Massachusetts technology framework was consistent with other strictly regulated sports wagering jurisdictions. He stated that GLI-33 was modified to align with Massachusetts statutes and regulatory structures. He explained that the framework was augmented by operational risk control requirements that included change control regulations and boundaries for guidance with regard to internal control standards.

Mr. Mullally stated that sports wagering was more dynamic than retail gaming operations. He stated that initial testing and certification was just the beginning, and that operators would be required to have continued cooperation with regulators to manage these systems. He encouraged the Commission to continue engagement with the Regulators Network Securities Task Force.

GLI's Director of Client Solutions, Joe Bunevith, explained that before the test lab could make submittals, the Commission would need to approve 205 CMR 138, 205 CMR 238, 205 CMR 247, and 205 CMR 248. He noted that those regulations were scheduled for a vote in the following week. He stated that after those regulations were approved, the operators would submit the code for their sports wagering system and hardware to GLI for testing. He explained that the code would be tested in a locked-down environment to verify compliance with regulations and GLI standards and Massachusetts specific requirements. He remarked that additional testing would take place at the retail point-of-sale and that these tests would take two to three days. He concluded by stating that GLI would also review operators' internal controls and procedures.

b. [Report on Suitability of the Applicant](#) (1:25:50)

Chief Enforcement Counsel Heather Hall explained that when evaluating PPC's suitability for a sports wagering license, the Commission could utilize information obtained from suitability investigations related to G.L. Chapter 23K. She stated that in 2013, the Commission found PPC and its then Qualifiers suitable in connection with its application for a gaming license under G.L. Chapter 23K. She stated that new qualifiers who joined the company also submitted to those same background check requirements. She explained that the applicant, PPC, had remained in good standing with its ongoing suitability requirements.

c. [Financial and Economic Impact Analysis](#) (1:29:20)

Partner from RSM US, LLP, ("RSM") Greg Naviloff, stated that RSM had reviewed sections of the application pertaining to finance. He introduced Jeff Katz, RSM's Strategic Finance Practice



Leader, Theresa Merlino, RSM's National Gaming and Hospitality Leader, and Connor Loughlin, RSM's Director of Financial Consulting.

Ms. Merlino stated that RSM's presentation was based upon documentation received as of December 2, 2022. She noted that the presentation was subject to change if new information became available. She reported that PPC provided retail market share for other jurisdictions, but did not include an estimated market share for PPC. She stated that external research was used to understand the Massachusetts sportsbook market size in order to understand PPC's assumptions. Mr. Katz stated that RSM had extrapolated a low end and high end for market share based on its analysis. He stated that based upon the historical breakdown between retail and online sports wagering in other jurisdictions, PPC's forecast was within the range of the third-party research relied upon by RSM. He stated that PPC's estimated hold percentage and estimated gross gaming revenue ranges were within the range of reasonableness.

Ms. Merlino stated that the estimated projections by PPC appeared to be in alignment with the industry overall; and those assumptions seemed to be based on performance in other jurisdictions. She stated that non-gaming revenue projections were included in the application, but the calculations as to how those numbers were reached were not included in the application. She stated that it may be beneficial for the Commission to understand how non-gaming revenue projections compared to historical performance of the sports bar in this space.

Ms. Merlino stated that there had been issues in the industry with combining databases from traditional loyalty programs and sportsbook loyalty. She stated that the Commission may want to know PPC's intended approach to linking the existing loyalty program with the planned sportsbook platform as noted in the application.

Ms. Merlino stated that the proposed construction timeline was comparable with other remodel projects and was consistent with the industry standard. She stated that there was not a significant risk of supply chain issues.

Mr. Loughlin stated that as of September 30, 2022, Penn had a debt balance of \$13 billion. He stated that Penn historically and currently maintained ample capital and liquidity to support operations. He stated that Penn maintained an average total liquidity position of \$2 billion. He stated that as of September 30, 2022, Penn had \$2.7 billion in total available liquidity, with \$1.7 billion in cash on hand, and \$1 billion in availability under its current credit facility.

#### [5. Review and Evaluation of Application for Category 1 Sports Wagering Operator License Submitted by PPC in Accordance with 205 CMR 218.00 including, but not Limited to Consideration of the Following Criteria \(2:04:41\)](#)

Chair Judd-Stein then asked General Counsel Grossman to advise the Commission in navigating the review of facts in regard to the redacted copies of the application. General Counsel Grossman explained that a redacted version of the sports wagering application was posted to the Commission's website. He stated that this was done for the purpose of transparency regarding a topic of public interest. He stated that the Commission had asked the applicants to redact their

applications consistent with G.L. Chapter 23N, § 6(i). He stated that each applicant redacted their applications consistent with the statute and other public records law exceptions. He noted that the Commission staff did not make the redactions, and that the redacted applications were available online for public review.

Chair Judd-Stein asked how the Commission would be guided if a topic might fall within the public records law exception within G.L. Chapter 23N, § 6(i). General Counsel Grossman stated that the most efficient method would be to put the onus on the applicant to flag areas of concern to the Commission. He stated that the Commission could then pause proceedings and make a determination as to whether the information discussed would fall into the confines of a public record law exemption. He noted that there must be specificity as to what can be discussed in the executive session, and that all other topics must be discussed in a public forum.

a. [Experience and Expertise Related to Sports Wagering - 205 CMR 218.06\(5\) \(a\)](#)  
(2:10:43)

Commissioner O'Brien stated that she had no concerns regarding PPC's experience and expertise based on its application and presentation. Commissioner Hill and Commissioner Maynard agreed.

Commissioner Skinner noted that PPC's application relied heavily on the expertise of category three applicant, PSI. She asked for clarification regarding the nature of the contractual relationship between PPC and PSI. Mr. Grounsell stated that there was an intercompany agreement where PSI would provide services to PPC as a vendor. He stated that the relationship was similar to how PPC used vendors with specific expertise for building slot machines. He explained that PPC would operate the equipment, but that the PPC staff did not have the expertise to create their own hardware and would require vendor support. He stated that it was also common in sports wagering to have another party manage markets.

Commissioner Skinner asked if PSI would be operating the retail sportsbook at PPC. Mr. Grounsell explained that the team-members operating the equipment would be PPC employees, and that PSI was more akin to a vendor. Commissioner Skinner asked if PSI's involvement included marketing services. Mr. Grounsell stated that PSI would not provide marketing services. Commissioner Skinner asked who would be purchasing the equipment. Mr. Grounsell stated that PSI would provide the equipment and certain trading services, such as line setting. Commissioner Skinner noted that PSI would be new to the Massachusetts market both as a vendor collaborating with the retail sportsbook and also as a mobile operator. She asked what the Commission's obligation was with respect to reviewing PSI as a potential qualifier for PPC and noted that the current suitability finding did not touch upon PSI.

Chief Enforcement Counsel Hall stated that the IEB provided an executive summary to the Commission that had information pertaining to the suitability of PPC and its qualifiers. She stated that PPC was found suitable following a full investigation into the context of its gaming license under G.L. Chapter 23K. She stated that while PSI was tethered to PPC, PSI's suitability would be reviewed in relation to their category three sports wagering license application. She

stated that the analysis of PSI's suitability would include a report reflecting a review for preliminary suitability based upon the submissions by the applicant, its Qualifiers, and an open-source review. She noted that PSI was currently being reviewed as a category three applicant.

Commissioner Skinner asked what the Commission's responsibility was with respect to PSI as a vendor of PPC, as PSI was heavily intertwined with PPC's sports wagering endeavors. She stated that she would like further clarification regarding how to review PPC's application without having the opportunity to review PSI's application as it was related. She stated that PSI could potentially exercise control over the operation as they held the contract as the vendor. Executive Director Karen Wells stated that the Commission did not need to vote in this meeting and could receive more information when reviewing the tethered operators' applications. Mr. Grounsell noted that PSI was a wholly owned subsidiary of Penn, and that a lot of the resources PPC was relying upon were from Penn.

Commissioner O'Brien highlighted that the applications from the category one applicants did interact with the tethered operators' applications. She stated that Commissioner Skinner had a good point, and that some issues may arise due to interplay with the category three applications. Commissioner Maynard agreed and stated that he would like to get more information from PSI's presentation.

Commissioner Skinner stated that she had confidence in PPC's experience and expertise related to sports wagering. Chair Judd-Stein noted that she appreciated the consensus; and added that this topic would be revisited when additional information was provided as part of PSI's presentation.

Chair Judd-Stein noted that RSM had raised concerns regarding the integration of loyalty programs and asked for further clarification. Ms. Merlino explained that there were operational challenges as sports wagering platforms were outside of the traditional gaming IT framework, as sports wagering was more heavily software driven. She stated that in other jurisdictions, there was sometimes a disconnect with the loyalty program at the sportsbook level and retail gaming level; and that it could be difficult to merge accounts. Ms. Merlino said that the application was neutral regarding PPC's plans to integrate its loyalty program. Mr. Grounsell reported that PPC's loyalty program was already fully integrated into a single account per player. Chair Judd-Stein stated that it was helpful to know the issue was primarily an integration issue.

Chair Judd-Stein asked whether it was common for operators to cultivate their online database to have accounts set up. Mr. Bunevith stated that it was standard in the sports wagering industry to onboard customers quickly when moving into new markets. Chair Judd-Stein inquired whether operators could allow customers to set up sports wagering accounts in advance of the sports wagering framework being in place. Mr. Bunevith stated that there were no prohibitions in place to stop that.

Chair Judd-Stein asked if any regulators had precluded deposits prior to sports wagering being legal within their jurisdiction. Mr. Bunevith stated that restrictions on pre-registration were not common, but he would have to research if another jurisdiction had a regulation that would do so.

Chair Judd-Stein asked if PPC or its tethered partners had considered pre-registration. Mr. Grounsell stated that PPC had not begun pre-registration as the Commission had yet to decide whether pre-registration was allowed. Mr. Bunevith stated that operators typically used a pre-registration process when the market is not open for bets. He stated that this process signs up customers and speeds up the know-your-customer (“KYC”) process. He stated that this mostly applied to mobile operators.

Mr. Mullaly stated that pre-registration was the norm in the industry and allowed for operators to provide KYC, geolocation, and payment provider services. He added that pre-registration also provided regulatory benefits. Chair Judd-Stein stated that the Commission would provide guidance on pre-registration either through internal controls or a regulation. She stated that she had concerns about equity, and asked whether the risks were lower to the consumer with pre-registration.

Mr. Mullaly stated that allowing pre-registration at this point was low risk and would avoid bottlenecks. He stated that there was no technical reason to say yes, or no. Mr. Grounsell stated that PPC would continue to watch for the Commission’s direction regarding pre-registration. General Counsel Grossman stated that this would be a good topic to discuss as part of license conditions. He stated that there should be uniformity for all operators. Mr. Grounsell added that PPC did not offer account-based wagering at the retail level. He stated that customers could establish a loyalty account, but money could not be pre-loaded at the retail level.

Commissioner Maynard stated that when the Commission voted on not re-opening the timeline, his vote was predicated on there being a level playing field. He stated that the easiest way to set that level playing field seemed to be to allow all applicants to begin curating data. He stated that it was important to address this equity issue. Executive Director Wells stated that another prospective sports wagering licensee had inquired regarding the same issue and requested details regarding the parameters of pre-registration.

Chair Judd-Stein inquired what issues were involved with the redacted sections regarding the overview of wagering activity. Mr. Grounsell stated that there were specific details regarding the determinations of wagering volume, and that the calculations would be considered trade secrets. He stated that the information was based on other jurisdictions with similar population sizes.

Chair Judd-Stein inquired as to whether other states were launching sports wagering and extensive offering. Mr. Grounsell stated that the traditional approach was to have a larger list of offerings that are approved by the regulator. He stated that the suggested catalog was reasonable based on knowledge of certain markets and player preference.

Ms. Merlino stated that sportsbooks had reliance upon volume of wagers, and that fewer options limited the public’s interest. She stated that the public received value in having a variety of regulated games to wager on. She noted that more offerings also increased the benefit to the Commonwealth. Mr. Bunevith stated that what might seem extensive for a new jurisdiction would not be considered so expansive in a jurisdiction that had been conducting sports wagering for long periods.

The Commission reached a consensus that PPC had met the Commission's expectations in regard to this section of the application.

b. [Economic Impact and Other Benefits to The Commonwealth if Applicant is Awarded a License \(205 CMR 218.06\(5\)\(b\)\) \(2:58:35\)](#)

Commissioner O'Brien asked if the anticipated increase in employees for the sportsbook area was a net increase in jobs over pre-Covid numbers or adding to the existing job numbers. Mr. Grounsell stated that the employees at the bar would be roughly equivalent to pre-Covid numbers, but that the sportsbook employees would be a net add of ten-to-fifteen employees. He stated that during busier sports seasons, the numbers would fluctuate and there would likely be more team members.

Commissioner Skinner noted that Flutie's had been closed since Covid and asked how PPC planned to recruit for these spaces. Mr. Grounsell stated that this outlet traditionally had a higher percentage of women employees, and that most net jobs added in America over the past few months had been in the hospitality and leisure sectors. He stated that recruitment efforts would continue and that PPC made all members eligible for benefits on their first day of employment. He stated that PPC was also utilizing hiring bonuses in its recruitment initiatives.

Commissioner Hill asked if PPC would continue to work with chambers of commerce and nearby community colleges. Mr. Grounsell stated that PPC would continue these practices, and noted that the relationships with local colleges had proved fruitful in bringing in interns.

Commissioner Maynard asked if PPC was committed to ensuring that women and diverse candidates were also entering management positions, or if the new positions would be largely entry level. Mr. Grounsell stated that the largest number of new positions would be at entry level. He stated that management would continue to bring forward diverse candidates and that this was supported by the Emerging Leaders Program. Mr. Grounsell noted that PPC included its statistics regarding diversity in supervisory and above positions in its quarterly reports to the Commission. He stated that the team had not only met its diversity goals, but also exceeded them.

Commissioner Skinner inquired about the IEB's involvement in PPC's proposal to expand the gaming area. Bruce Band, Assistant Director of the IEB's Gaming Agent's Division stated that the IEB was working closely with PPC. He stated that construction had started and that PPC had been cooperative with all IEB requests. He stated that the IEB had no concerns at this time. Chair Judd-Stein asked if a request to expand the gaming area was required. Assistant Director Band stated that the gaming floor would need to be changed for the permanent sportsbook, but that it would not be required for the temporary sportsbook. Commissioner Skinner asked if Commission approval was required for the temporary space. Assistant Director Band noted that the temporary sportsbook was already on the casino floor.

Chair Judd-Stein noted that the Commission was scheduled to discuss the issue of taxation regarding promotional play on December 12, 2022. She asked if PPC's tax calculations assumed

a deduction for promotional play. Mr. Grounsell stated that PPC was aware that the Commission had yet to deliberate on this issue, but that he would prefer to discuss the calculations in the executive session. Commissioner Hill stated that it might be beneficial to hold the executive session on this topic at the December 12, 2022, meeting. He noted that it was possible all licensees would have to adjust their numbers.

Chair Judd-Stein asked if the construction of the temporary space raised any concerns for RSM. Ms. Merlino stated that there were no concerns regarding the construction, and that the only concerns were regarding supply chain concerns. She stated that based on RSM's review there did not appear to be major issues that would impact the ultimate opening.

Chair Judd-Stein asked if there were any concerns about underage individuals accessing the kiosks. Mr. Grounsell stated that the temporary sportsbook was located in an existing gaming space near the Revolution lounge which required patrons to pass a security podium to access.

Commissioner Maynard asked if erecting a temporary cage was standard, and if the IEB was comfortable with the temporary structure. Assistant Director Band stated that PPC had agreed to make whatever modifications the Commission requested to ensure the safety of the structure.

Commissioner Hill asked how sports wagering would enhance PPC's community involvement. Mr. Grounsell stated that PPC was engaged with New Hope, Boston Pearl, the Town of Plainville, the City of North Attleborough, the Attleborough YMCA, the United Regional Chamber of Commerce, and Habitat for Humanity. He stated that PPC had a commitment to continued community engagement.

Chair Judd-Stein noted that PPC had a partnership with the lottery as required by G.L. Chapter 23K. She stated her expectation that PPC would continue to collaborate for the benefit of the lottery moving forward. Commissioner Maynard asked if the existing Memorandum of Understanding ("MOU") with the lottery would be sufficient to cover sports wagering. Mr. Grounsell stated that PPC's relationship with the lottery would remain, and that sports wagering would be covered by the existing MOU

Commissioner Skinner noted that the application listed five ticket-windows in the temporary sportsbook, but only four in the permanent sportsbook. Mr. Grounsell stated that based upon Penn's experience in other jurisdictions, there was typically a surge in customers once sports wagering operations began that dwindles at the retail level when online sports wagering was launched. He stated that the reduction of ticket windows aligned with that statistic.

Commissioner Skinner noted that PPC's application stated that PPC would engage local police for periods of extraordinary volume, and asked how PPC intended to anticipate when those periods would be. Mr. Grounsell explained that PPC already engaged police for high-volume days such as the Kentucky Derby. He stated that Penn could predict what days might have increased volume based upon data from other jurisdictions. He stated that there was also increased betting volume around certain events like the Super Bowl and March Madness.

Chair Judd-Stein asked if Kambi or a PPC employee set the line for wagers. Mr. Grounsell explained that Kambi facilitates the market, but that PPC employees would make the decision whether to post certain offerings. Chair Judd-Stein stated that the Commission would learn more about Kambi's role in the technology section of the application.

Commissioner Skinner asked how responsible gaming messaging worked with respect to kiosks. Mr. Grounsell stated that he could provide a more fulsome answer to this question in executive session. Chair Judd-Stein requested that the Commission's Responsible Gaming Division also weigh in on this topic. Mark Vander Linden, Director of Research and Responsible Gaming stated that kiosks would need to have information related to GameSense and other responsible gaming tools. He stated that players gambling with a player-card should have full access to a range of limit setting options. He stated that the Commission would discuss this further in an upcoming meeting.

Chair Judd-Stein stated that she wanted to ensure that responsible gaming tools available for casino gaming would also be available for retail sports wagering. She noted that this topic could be discussed more in the executive session.

The Commission reached a consensus that PPC had met the Commission's expectations in regard to this section of the application.

c. Applicant's Willingness to Foster Racial, Ethnic, and Gender Diversity, Equity, and Inclusion (205 CMR 218.06(5)(d)) (4:12:50)

Commissioner O'Brien commended PPC for their DEI statistics and program that advances women into leadership roles. She then requested that PPC provide further details regarding their supplier diversity. Mr. Grounsell explained that some suppliers were not qualified spend, as they came from a sole source that could not be bid out. He stated that sports wagering spending was included in the overall spend, and that PPC's procurement team met monthly to ensure continued progress with diverse spending. He stated that PPC's numbers were good because the procurement team worked diligently to develop a diverse supplier vendor base. Mr. Grounsell stated that a lot of the spending was local, but not with towns that PPC had surrounding community agreements with. He stated that this spending wasn't designated as 'local' but was still from nearby communities in the Commonwealth. He stated that PPC planned to continue its existing procurement efforts. Commissioner Skinner commended PPC for their 13% increase in diversity spend between 2020 and 2021.

Commissioner Maynard expressed support for the LEAD program and PPC's involvement with the New Hope Program. Mr. Grounsell explained that the Women Leading at Penn Program allowed for women executives to focus on bringing more women into Penn's team. He stated that mentors were available to show that advancement was possible. Commissioner Skinner expressed her support for Penn's small business incubator program.

The Commission reached consensus that PPC had met the Commission's expectations in regard to this section of the application.

d. [Proposed Measures Related to Responsible Gaming \(205 CMR 218.06\(5\)\(c\)\)](#) (4:23:46)

Commissioner O'Brien stated that while Barstool Sports ("Barstool") was not an applicant, Penn was co-branding with Barstool since quarter three of 2021. She stated that there had recently been press coverage regarding individuals from Barstool and their advertising practices. She stated that this raised both a responsible gaming issue and a suitability issue. She stated that the sportsbook at PPC would be in a Barstool branded sports bar and expressed concern about the historical marketing associated with Barstool. She stated that there was recent coverage in the New York Times regarding Barstool's conduct, and expressed concern about potential advertising to college-aged students.

Chair Judd-Stein noted that there was a supplement to the IEB report as a result of a New York Times article related to Penn's relationship with Barstool. Chief Enforcement Counsel Hall stated that Penn disclosed to the IEB that it was aware that this article was going to be released. She noted that the article in question was published in the New York Times on November 20, 2022, and was titled "*A Risky Wager: Desperate for Growth, Aging Casino Company Embraced 'Degenerate Gambler'*". Chair Judd-Stein stated that some suitability questions may evolve based on the article.

Commissioner O'Brien stated that the article discussed an incident in 2022, where David Portnoy and other members of Barstool were discussing marketing near the University of Tennessee. She stated that the AGA's marketing guidelines stated that operators were not meant to deliberately advertise where it was reasonably expected that less than 73.6% of the target audience would be under the legal gaming age, and to not advertise on college campuses. She stated that she was concerned from the responsible gaming context that PPC would be co-branding with Barstool. She stated that she wanted to know how Penn intended to address this issue.

Penn's Chief Compliance Officer Christopher Soriano stated that responsible gaming was an evolving area being monitored by the industry. He stated that it was important to the team to ensure that Penn was in compliance. He reported that Penn would not target underage persons with marketing and that KYC programming would prevent underage persons from signing up to wager.

Mr. Soriano stated that Barstool was very active in the media space - with over 100 different channels of distribution. He stated that since Penn became affiliated with Barstool, strict guardrails had been imposed, including regular training and coordination. He noted that Barstool had prepared responsible gaming messages and weaved them organically into their content. He stated that the corporate responsible gaming committee also discussed Barstool's responsible gaming marketing. He stated that Penn worked with responsible gaming stakeholders to collaborate with experts in the industry. Erin Chamberlin, Penn's Senior Vice President of Regional Operations stated that Penn was not sponsoring any colleges or universities from a marketing perspective.



Mr. Grounsell stated that Barstool employees regularly discussed bets they lost and not just bets they had won. Ms. Chamberlin stated that responsible gaming was often reduced to boilerplate information or checking a box. She stated that one creative way Barstool addressed responsible gaming was by allowing their personalities to explain why responsible gaming was important in their own voices. She stated that this different approach resonated more with younger demographics and could be used in addition to standard industry-wide approaches.

Commissioner O'Brien noted that the Tennessee example listed in the New York Times article included co-marketing for an alcoholic drink on a college campus. She asked if there were additional facts that the Commission may find relevant about that situation.

Mr. Soriano stated that the Barstool College Football Show was produced by Barstool Media and not Barstool Sportsbook. He stated that the program was a generic college football program rather than a targeted sportsbook promotion. Commissioner O'Brien asked if this show discussed betting. Mr. Soriano stated that betting was discussed, but that it was not a sportsbook specific advertisement.

Chair Judd-Stein stated that the Commission was at a crossroads due to the timing of the New York Times article, and that the Commission had an obligation to reconcile the public information related to Barstool with what was included in the application. She stated that aside from the Barstool issue, PPC's application was commendable regarding responsible gaming.

Chair Judd-Stein stated that the AGA code of conduct requested measures to ensure that marketing reached its target audience and not underage or vulnerable populations. She stated that this was a concern because TikTok was a primary Barstool platform. She stated that the New York Times article also raised questions regarding Barstool's advertising and marketing.

Mr. Grounsell stated that the Tennessee incident did not take place on a college campus. He noted that college football games were large events that include both the student body and other spectators over the age of twenty-one. He expressed that Penn understood the Commission's concern and strived to remain transparent regarding any breaches.

Mr. Soriano added that Penn regularly communicated with its regulators, and that Penn proactively gave the information regarding Barstool to the IEB. He stated that Penn could provide additional data regarding Barstool's audience reach and metrics if that would be helpful to the Commission.

Commissioner O'Brien stated that the additional information would be helpful. She noted that she appreciated the context, but that there was still concern related to Barstool. She reiterated that Penn's application was otherwise great in relation to responsible gaming. She stated that tying the branding to Barstool was a concern, and that she would like to see the audience metrics in an executive session. Ms. Chamberlin confirmed that Penn would be able to provide data regarding its in-house advertising guidelines in an executive session.

Chair Judd-Stein stated that in Penn's annual 10K filing, it noted that Barstool may result in potential adverse reactions, negative publicity, or changes to business, regulatory, or other stakeholder relationships. She stated that none of the Commission's concerns regarding Barstool were news to Penn as they were anticipated in the 10K filing.

Chair Judd-Stein stated that while there was focus on the advertising at universities, that she was also concerned about messaging she perceived as excessive gambling. She stated that she could be convinced with data, but that there would have to be a reconciliation between the messaging and responsible gaming programs.

The Commission reached a consensus to discuss the responsible gaming impacts of PPC's relationship with Barstool in an executive session. Commissioner Hill noted that the kiosk question raised by Commissioner Skinner that pertained to underage patrons could also be discussed in the executive session.

e. [Technology that the Applicant Intends To Use \(205 CMR 218.06\(5\)\(e\)\)](#) (4:59:15)

Chair Judd-Stein noted that PPC had a national monitoring system and was using Kambi as an integrity monitor. She asked how the monitoring systems were integrated into PPC staffing. Mr. Grounsell stated that the integrity monitor would check betting patterns that might indicate that a customer was acting illegally or trying to exploit a market. He noted that he was not comfortable discussing how it was performed in public. He stated that the monitors would look for suspicious activity and coordinate with other operators. Chair Judd-Stein asked who would have the contract with Kambi. Mr. Grounsell stated that PSI would contract with Kambi and that PPC would contract with PSI.

Commissioner Maynard asked if the monitoring systems would have the infrastructure in place to prevent data breaches. Mr. Grounsell noted that retail customers would not have registered accounts, and that Kambi's integrity monitoring was not for the retail market. Commissioner Maynard stated that he would raise this question again when reviewing PSI's application.

Commissioner Skinner asked GLI for guidance on whether the applicant's answers regarding the technical components of the application were sufficient. Mr. Bunevith stated that Kambi had been certified in over twenty-five jurisdictions and provided sports wagering platforms for fifteen years in European markets. He stated that GLI regularly worked with Kambi. He stated that Kambi's systems would be thoroughly tested, but that GLI was also familiar with their system. Commissioner Skinner stated that she was comfortable with the technology section to the extent she understood it. She confirmed that she would want further detail regarding which components were relevant to retail sportsbooks as opposed to online sportsbooks.

Commissioner Maynard stated that he agreed with Commissioner Skinner and stated that it was unclear how much crossover there was between the mobile applications, sports wagering kiosks, and windows at retail locations. Mr. Grounsell explained that kiosks presented lines with underlying software within the purview of Kambi's protection service. He stated that at the

property and corporate level, Penn conducted security compliance meetings to ensure there were no data breaches.

Commissioner Skinner stated that she was struggling with PPC's reliance upon PSI's application and asked GLI to explain the difference in technology. Chair Judd-Stein asked if GLI found anything of concern in PPC's application. Mr. Bunevith stated that the application seemed fairly standard from the technical perspective. He stated that data and risk management were fed into the main sports wagering engine server, where all bets were placed. He stated that the engine server was physically located in Massachusetts to satisfy the wire act.

Mr. Bunevith explained that the primary difference between retail and mobile sports wagering was the lack of account-based wagering at the retail level. He showed a visual of the technology framework for sports wagering systems. Commissioner Skinner stated that the visual was helpful.

The Commission reached consensus that PPC had met the Commission's expectations in regard to this section of the application.

f. [Suitability of the Applicant and its Qualifiers \(205 CMR 218.06\(5\)\(f\)\)](#) (5:17:45)

Chair Judd-Stein asked if there were any further questions regarding suitability. Commissioner O'Brien noted that her concerns regarding to Barstool were both related to responsible gaming and suitability. She stated that the PPC sportsbook was going to be Barstool branded. She noted that there were concerns regarding David Portnoy as the main marketer of Barstool. She stated that this connection between PPC and Barstool merited further discussion by the Commission. Chair Judd-Stein clarified that the Commission was reviewing the suitability of qualifiers for PPC, which was why Barstool remained in the discussion.

6. [Executive Session](#) (5:40:10)

General Counsel Grossman explained that G.L. Chapter 23N, § 6(i) allowed for the Commission to meet in executive session to discuss proprietary information provided in the course of an application, the disclosure of which would place an applicant at a competitive disadvantage. He stated that the Commission would need to conclude that the information was a trade secret, competitively sensitive, or proprietary, and that it would place the applicant at a competitive disadvantage if discussed publicly. He stated that the topics must be narrowed as specifically as possible to meet the exemption.

General Counsel Grossman stated that the two topics raised for executive session discussion were advertising information relative to Barstool, and the associated data and information about responsible gaming messaging on kiosks. He explained that the data in reference to Barstool's advertising and marketing would likely meet the definition of competitively sensitive data. Mr. Grounsell stated that the demographic breakdown was a trade secret that was not publicly available. He explained that the kiosk information fell into a public records law exemption related to the safety of people and buildings.

Chair Judd-Stein asked what exemption could be used to discuss PPC’s suitability regarding their relationship with Barstool. Commissioner O’Brien stated that it would likely fall under the definition of competitively sensitive information. General Counsel Grossman explained that suitability related to Barstool was an issue separate from advertising information related to Barstool.

Chair Judd-Stein read the following in the record, “the Commission anticipated that it may meet in executive session in conjunction with its review of the application in accordance with G.L. c.30A, §21(a)(7), for purposes of compliance with G.L. c. 23N, §6(i), to specifically discuss advertising issues related to Barstool and a review of associated data, to discuss the use of kiosks related to responsible gaming, and to discuss the suitability of Barstool as these matters relate to trade secrets, competitively sensitive information, or proprietary information the discussion of which if disclosed publicly would place the applicant at a competitive disadvantage.” Commissioner O’Brien noted that the issue related to suitability was as to PPC due to their connection with Barstool.

With that, Commissioner O’Brien moved that the Commission enter executive session on the matter and for the reasons just articulated by the Chair. Commissioner Skinner seconded the motion.

*Roll call vote:*

<i>Commissioner O’Brien:</i>	<i>Aye.</i>
<i>Commissioner Hill:</i>	<i>Aye.</i>
<i>Commissioner Skinner:</i>	<i>Aye.</i>
<i>Commissioner Maynard:</i>	<i>Aye.</i>
<i>Chair Judd-Stein:</i>	<i>Aye.</i>

*The motion passed unanimously, 5-0.*

General Counsel Grossman inquired as to whether the Commission would return to the public session of the meeting. Commissioner O’Brien stated that some of the questions posed would be answered more clearly when evaluating PSI’s application in connection with PPC’s application. She stated that it made sense to defer a determination until further discussion occurred.

The Commission reached a consensus in favor of postponing a deliberation regarding the approval or denial of the application until the review of PSI’s application on December 13, 2022.

Commissioner Maynard asked if delaying the deliberation would affect the timeline for sports wagering. Executive Director Wells stated that the operators would be able to submit their internal controls once the regulation was approved regardless of whether a vote was held. Commissioner Maynard expressed support for getting more information prior to voting.

Chair Judd-Stein stated that she could reserve the right to return to the public session of the meeting should information come out in the executive session that would prompt additional

questions related to the application. Commissioner Hill stated that he did not believe that to be necessary. Commissioner O'Brien agreed with Commissioner Hill. Commissioner Skinner noted her preference that any outstanding questions could be addressed during the review of PSI's application on December 13, 2022.

*Transcriber's note: The Commission then entered an executive session and did not return to the public session of the meeting.*

### **List of Documents and Other Items Used**

1. [Notice of Meeting and Agenda](#) dated November 30, 2023



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## Massachusetts Gaming Commission Meeting Minutes

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**Date/Time:** December 7, 2022, 10:00 a.m.  
**Place:** Massachusetts Gaming Commission

VIA CONFERENCE CALL NUMBER: 1-646-741-5292  
PARTICIPANT CODE: 112 421 2543

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

### **Commissioners Present:**

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

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

Chair Judd-Stein called to order the 407<sup>th</sup> Public Meeting of the Massachusetts Gaming Commission ("Commission"). Roll call attendance was conducted, and all five commissioners were present for the meeting.

Chair Judd-Stein began the meeting by stating that the Commission's principal responsibility in reviewing the sports wagering applications was to ensure the integrity of the gaming industry in Massachusetts. She stated that the Commission would maintain strict oversight of gaming establishments and sports wagering operators. She highlighted that awarding a sports wagering license was a privilege and that operators would be held to the highest standards of compliance on a continuing basis. She stated that the Commission's mission permits the creation of a fair, transparent process that engendered the confidence of the public and maximized the benefits to the Commonwealth. She then briefly explained the agenda for this public meeting.

2. [Legal Framework relative to the award of a sports wagering license](#) (06:00)

General Counsel Todd Grossman stated that this meeting was the Commission's opportunity to evaluate the application for a category one sports wagering license submitted by Blue Tarp reDevelopment, LLC, d/b/a MGM Springfield ("MGM"). He explained that under G.L. Chapter 23N, § 6(b)(1), the Commission shall issue a category one sports wagering license to any holder of a gaming license under G.L. Chapter 23K, provided that any holder of a category one sports wagering license shall not receive a category two sports wagering license.

General Counsel Grossman stated that MGM held a gaming license under G.L. Chapter 23K. He stated that category one sports wagering license was defined in G.L. Chapter 23N, § 3 as a license issued by the Commission that permits in-person sports wagering at a gaming establishment; and not more than two individually branded mobile applications or digital platforms approved by the Commission. He stated that entities operating the mobile platforms would be required to have a category three sports wagering license.

General Counsel Grossman stated that 205 CMR 218 set out the application requirements, standards, and procedures. He stated that the Commission had convened a meeting to receive public feedback on the category one applications on December 5, 2022. He stated that the regulation sets out factors and considerations for the Commission to analyze in the evaluation process, but that the regulations did not set out a particular order to review factors nor did the regulation assign particular weight to the factors. He stated that the Commission may require that the applicant provide additional information or documents the Commission deemed appropriate.

General Counsel Grossman noted that the evaluation of this application was being conducted in public and that all deliberations made by the Commission must take place in public. He stated that G.L. Chapter 30A, § 21(a)(7) allowed the Commission to move into executive session to comply with or act under the authority of any general law, such as G.L. Chapter 23N, § 6(i) regarding competitively sensitive information submitted in the course of the application process. He stated that if the Commission requested answers pertaining to competitively sensitive information, the applicant could request to move the meeting to executive session.

General Counsel Grossman stated that any finding the Commission makes must be backed by substantial evidence, and that the heightened standard of clear and convincing evidence applied to suitability pursuant to 205 CMR 215.

General Counsel Grossman stated that the factors the Commission would evaluate would be: the applicant's experience and expertise related to sports wagering; the economic impact and benefits to the Commonwealth; the applicant's proposed measures related to responsible gaming; the description of the applicant's willingness to foster racial, ethnic, and gender diversity, equity, and inclusion ("DEI"); the technology the applicant intends to use in operation; suitability of the applicant and qualifiers; and any other appropriate factor in the Commission's discretion.

General Counsel Grossman stated that the Commission could determine temporary or durable findings of suitability, but that no preliminary finding needed to be entered. He noted that the

Commission could use any information received pursuant to G.L. Chapter 23K, G.L. Chapter 128A, G.L. Chapter 128C, or information from other jurisdictions where an operator was licensed to operate. He stated that additional conditions could be placed on a license pursuant to 205 CMR 220. General Counsel Grossman noted that an operator would also require an operations certificate before they could commence sports wagering operations.

3. [Presentation of Application for Category 1 sports wagering operator license submitted by Blue Tarp reDevelopment, LLC \(d/b/a MGM Springfield\) \(“MGM”\) in accordance with 205 CMR 218.06\(3\) \(20:16\)](#)

Jed Nosal, Outside Licensing and Regulatory Counsel for MGM, introduced Chris Kelley, President and COO of MGM, Arlen Carballo, MGM’s Executive Director of Finance, Beth Ward, MGM’s Director of Community Affairs, Dan Miller, MGM’s Director of Compliance, Gus Kim, MGM’s Legal Counsel, Danielle White, MGM’s Vice President of Community Engagement, Garrett Farnes, MGM Resorts International’s (“MGM Resorts”) Director of Responsible Gaming, and Jae Rim MGM Resorts’ Director of Financial Investigations. He stated that other members of the team were on the call, and might be called on if their expertise was required to answer questions.

Mr. Nosal stated that MGM was requesting that the Commission make a durable finding of suitability and grant MGM a category one sports wagering license. Mr. Kelley explained that MGM Resorts had operated sportsbooks since 1979. He stated that MGM Resorts was active in twenty-four jurisdictions with anticipated markets in thirty-one jurisdictions.

Mr. Kelley explained that MGM had made a decision before sports wagering legislation was passed to spend millions of dollars creating a large sports viewing area, where patrons could engage in sports wagering and elements of the resort at the same time. He stated that this area was easily accessible from the Main Street entrance of MGM.

Mr. Kelley stated that MGM was one of the largest employers and taxpayers in the City of Springfield. He stated that MGM’s employment goals were to have 50% minority employees, 2% veteran employees, 50% women employees, and 35% Springfield resident employees. He stated that MGM was meeting or exceeding all of these goals except for its goal aimed towards women employees.

Mr. Kelley explained that MGM offered hiring events, paid dealer trainings, health benefits, and free meals for all employees. He noted that MGM was actively filling open positions and had more than 250 job requisitions. He stated that tax projections were provided in the application, but because those data points were confidential, MGM chose to present a snapshot of the Tunica, Mississippi location’s revenue. He stated that this location had \$65.9 million in revenue for 2021 and \$34.7 million through quarter three of 2022. He stated that the construction of the sports lounge and betting area was completed in August 2021 and that expenses totaled approximately \$4 million.



Ms. Ward presented on community engagement. She explained that MGM was involved in programs focusing on food insecurity, sustainability, and workplace development. She stated that MGM sponsored the Spirit of Springfield and donated to several local non-profits. She stated that MGM employees helped Source to Sea clean up the Connecticut River and volunteered at a local soup kitchen, Loaves and Fishes. She explained that MGM participated in the adopt-a-school program, sponsored a breast cancer walk, worked with Habitat for Humanity, and partnered with the non-profit, Rachel's Table. She noted that MGM donated unused food and hosted the Mayflower Marathon food drive.

Mr. Farnes stated that MGM and BetMGM had integrated GameSense into their guest service models. He stated that MGM used a holistic and comprehensive approach to responsible gaming which emphasized consumer education and mitigating gambling related harm. He explained that MGM used research to reinforce positive play, and that MGM employees were trained in best practices related to responsible gaming. He noted that MGM Resorts partnered with regulators, advocacy groups and external organizations to continue progressing in the field of responsible gaming. He stated that over 200 GameSense advisors were certified company-wide over the past year. He stated that he would conduct the responsible gaming trainings at MGM.

Mr. Farnes stated that MGM properties had responsible gaming awareness advertisements on signage at the properties, on the slot machines, by the ATMs, and on marquees. He stated that MGM prioritized adding multiple GameSense touchpoints through the property to spark interest in responsible gaming. He stated that sports-centric responsible gaming messaging would be added when sports wagering was implemented. He stated that MGM saw 100,000 website visits related to GameSense.

Mr. Farnes stated that MGM abided by the American Gaming Association's ("AGA") code of marketing and all regulatory requirements. He stated that safeguards were added to compare daily automated reports to the voluntary self-exclusion ("VSE") list. He stated that MGM Resorts had donated \$430,000 to the International Center for Responsible Gaming and partnered with EPIC Risk Management to develop training modules.

Ms. White explained that MGM focused on human capital to create an inclusive culture. She stated that MGM was growing its supplier diversity program and cultivating relationships with diversity centers of excellence. She stated that there was a DEI team with established supplier and internal diversity goals. She stated that MGM included diversity in the design of programmatic solutions, processes, and job sourcing.

Mr. Miller stated that MGM Springfield would use the system provided by BetMGM for all sports events. He stated that the sports wagering counter would have tills that allow cashiers to issue, redeem, or void wagers. He stated that all employees would go through job specific training and sports wagering training. He stated that when bets were placed at kiosks there would be ID verification and suspicious-activity monitoring.

Mr. Rim stated that the know-your-customer (“KYC”) program was integral to the company’s anti-money laundering (“AML”) program as it made customers known to the company. He explained that methods of review included KYC, source-of-wealth, source-of-funds, adverse media review, ID screening and ongoing monitoring screening.

Mr. Nosal stated that MGM and its qualifiers were found suitable in December 2013, and that their suitability and licensure was in good standing. He stated that MGM had a policy of transparency with compliance and that business-related litigation was self-reported to regulators. He stated that MGM Resorts had consolidated net revenues of \$3.4 billion as of Q3 2022. He stated that MGM Resorts had \$5.295 billion in cash and cash-equivalent assets. He noted that this information was available in Securities and Exchange Commission filings.

4. [Presentations and Analysis Relevant to Review and Evaluation of Application for Category 1 Sports Wagering Operator License Submitted by MGM](#) (1:34:14)

a. Technical Components- Gaming Laboratories International (“GLI”)

Chair Judd-Stein provided an initial overview of GLI. She explained that GLI was the first company to develop and set gaming technical standards, which are now considered an industry benchmark. She stated that GLI continued to innovate standards; and that regulators relied upon these standards to preserve the integrity of the industry. She then introduced GLI’s Director of Client Solutions, Joe Bunevith.

Director Bunevith, explained that before the test lab could make submittals, the Commission would need to approve 205 CMR 138, 205 CMR 238, 205 CMR 247, and 205 CMR 248. He noted that those regulations were scheduled for a vote in the following week. He stated that after those regulations were approved, the operators would submit the code for their sports wagering system and hardware to GLI for testing. He explained that the code would be tested in a locked-down environment to verify compliance with regulations and GLI standards and Massachusetts specific requirements. He remarked that additional testing would take place at the retail point-of-sale and that these tests would take two to three days. He concluded by stating that GLI would also review operators’ internal controls and procedures.

b. [Report on Suitability of the Applicant](#) (1:40:24)

Chief Enforcement Counsel Heather Hall explained that when evaluating MGM’s suitability for a sports wagering license the Commission could utilize information obtained from suitability investigations related to G.L. Chapter 23K. She stated that in 2013, the Commission found MGM and each of its then qualifiers, both individual and entity, suitable in connection with its application under G.L. Chapter 23K. She added that new qualifiers who joined the company also submitted to background process as well. As stated in the executive summary, Chief Enforcement Counsel Hall noted that the applicant remained in good standing with its ongoing

suitability requirements. She confirmed that she would remain available throughout the remainder of the meeting if Commissioners had questions.

c. [Financial and Economic Impact Analysis](#) (1:43:06)

Partner from RSM US LLP (“RSM”) Greg Naviloff stated that RSM had reviewed sections of the application related to finance. Jeff Katz, RSM’s Strategic Finance Practice Leader, Chuck Torrisi, RSM’s Director of Financial Investigations and Disputes, and Connor Loughlin, RSM’s Director of Financial Consulting.

Mr. Torrisi stated that the estimated market share analysis was linked to RSM’s projected revenue analysis. He stated that part of RSM’s analysis used external research to identify the likely Massachusetts sportsbook market size, and compare it with MGM’s market share assumptions.

Mr. Katz stated that RSM also used data from other jurisdictions where sports wagering was legalized to look at the contribution mix for retail and online sports wagering. He stated that the market share for each casino was also considered. He reported that based upon this information, MGM was in-range in terms of its estimated market share.

Mr. Torrisi stated that the sportsbook would have revenue attributed to non-gaming impacts, such as from the bar. He stated that the Commission may seek to understand further the approach MGM was using to link their loyalty program with BetMGM. He stated that compared to the square footage of other sportsbooks MGM is somewhat smaller, but that the proposed square footage was in-line with revenue estimates. Mr. Naviloff noted that the square footage associated with retail gaming was not strongly correlated with revenue generated from those spaces.

Mr. Loughlin stated that MGM Resorts had \$33.9 billion in debts and commitments as of September 30, mostly due to long-term lease commitments. He stated that MGM Resorts had reduced senior bonds and notes exposure due to the sale of growth properties. He noted that the average remaining lease term was approximately twenty-seven years. He stated that MGM had \$7.3 billion in total available liquidity, with \$5.2 billion in cash. Mr. Naviloff stated that MGM had significant liquid assets that could withstand business cycles.

5. [Review and Evaluation of Application for Category 1 Sports Wagering Operator License Submitted by MGM in Accordance with 205 CMR 218.00 Including, but not Limited to Consideration of the Following Criteria](#) (2:01:22)

a. Experience and Expertise related to Sports Wagering (205 CMR 218.06(5)(a))

Commissioner Hill asked if the proposed sports wagering area had always allowed for gaming. Mr. Kelley stated that the area of the property allowed for gaming, and was previously occupied by slot machines.

Commissioner Skinner noted that MGM's application stated that MGM would rely heavily on BetMGM and asked the applicant to explain that relationship further. Mr. Kelley stated that BetMGM was a joint venture, with 50% owned by MGM Resorts and 50% owned by Entain PLC, ("Entain"). He stated that BetMGM provided a service and platform for retail operations. He stated that all operations for MGM would be conducted by Springfield employees. Commissioner Skinner asked what services would be provided other than the platform. Mr. Kelley stated that there would be advisory services and a linked rewards system that occupied a separate database.

Commissioner Skinner noted that she was not pleased with how much of MGM's application referenced the BetMGM application. She stated that the missing details were needed to completely consider the category one applicant's application. She stated that she was not prepared for a full deliberation of this application without the benefit of reviewing the BetMGM application.

Mr. Nosal explained that the application relied on BetMGM as a vendor that provided services, and that MGM's application satisfied the rules and regulations to stand on its own. Commissioner Skinner asked if one of the services that BetMGM was providing was trading services, as that was a significant point of control and integrity for sports wagering operations. Mr. Kelley stated that odds-making was part of the BetMGM platform, and that BetMGM would train MGM in how to use the system. Mr. Nosal stated that while BetMGM was providing the training and platform, that the MGM staff would be operating the system.

Commissioner Maynard asked for clarification regarding the *Edit-My-Bet* and *Share-My-Bet* functions. Mr. Miller noted that these two features were available only on the mobile application and would not be used in the retail setting. Commissioner O'Brien noted her disappointment that MGM's category one application repeatedly referenced BetMGM's category three application and shared that some of her questions would not be timely until the Commission reviewed BetMGM's application.

Chair Judd-Stein inquired how many kiosks would be installed at MGM. Mr. Kelley stated that MGM had nine kiosks and was aiming for a total of eighteen kiosks to be installed on the gaming floor.

Chair Judd-Stein noted that due to the nature of the property, MGM had issues with minors accessing the gaming floor, and asked if MGM was comfortable with the design so that underage persons would not access the sports wagering location. Mr. Kelley stated that as of Q3, incidents of minors on the gaming floor had dropped by 90%, and added that MGM had recently added a Director of Security position.

The Commission reached consensus that MGM had met the Commission's expectations in regard to this section of the application.

b. [Economic Impact and Other Benefits to The Commonwealth If Applicant Is Awarded a License \(205 CMR 218.06\(5\)\(b\)\)](#) (2:24:34)

Chair Judd-Stein sought clarification as to whether the supervisor positions would be able to monitor the lines. John Grooms, BetMGM's Director of Retail Sports confirmed that supervisors at the sportsbook set the lines. He stated that supervisors would consult the trading team on movement and monitoring of lines.

Chair Judd-Stein noted that the application did not include any non-wagering revenue increases despite there being a bar near the sports wagering area. She asked if there was opportunity for MGM to leverage the retail site for more non-gaming revenue. Mr. Nosal stated that projections were calculated in a conservative manner, and that MGM's aspirations might be different than the projected numbers presented. Mr. Kelley added that it was an issue of expectation in comparison to aspirations and noted that MGM was facing difficulty in hiring efforts.

Commissioner O'Brien asked what MGM would do to focus on hiring Massachusetts employees rather than having a hiring push in Connecticut. Commissioner Maynard asked if the new positions were net new positions, or existing employees who would take on new roles. Mr. Kelley stated that the positions were net new positions and highlighted that over 75% of MGM's staff was from Springfield. He stated that approximately 80% of MGM's staff was from Massachusetts.

Commissioner Maynard noted that MGM's answer regarding the lottery did not discuss MGM's existing partnership with the lottery and asked for further clarification about that relationship. Mr. Kelley stated that lottery units were on the floor at MGM in portions of the business highly visible to guests, and that MGM provided lottery updates in their quarterly reports. Mr. Nosal noted that the formal agreement between MGM and the lottery was required by G.L. Chapter 23K. Chair Judd-Stein noted that BetMGM did not have a relationship with the Massachusetts lottery, and that there might be cross-marketing opportunities.

Chair Judd-Stein asked if the standard purchasing program used with local vendors worked as an economic driver. Ms. Carballo stated MGM had a robust program for identifying and working with vendors, and that MGM strived to meet its diversity goals.

The Commission reached consensus that MGM had met the Commission's expectations in regard to this section of the application.

c. [Applicant's willingness to foster racial, ethnic, and gender diversity, equity, and inclusion \(205 CMR 218.06\(5\)\(d\)\)](#) (2:41:04)

Commissioner Skinner reiterated that MGM's application deferred to the BetMGM application in several areas, and asked if MGM and BetMGM had a legal agreement. She asked if BetMGM

was expected to influence MGM's diversity goals. Mr. Nosal stated that the agreement between MGM and BetMGM was included in the BetMGM application, but that the document was marked confidential. Mr. Kelley stated that MGM's diversity goals and its approach to DEI would be driven by MGM's staff in Springfield.

Chair Judd-Stein stated that while MGM had yet to meet its workforce goal with respect to women, their numbers related to veterans and Springfield residents should be applauded. Mr. Kelley stated that MGM took pride in reaching its diversity goals, and that efforts were underway to continue to pursue the goal related to women.

Commissioner O'Brien asked what efforts MGM was making to increase their percentage of women employees, and asked if MGM could speak to the number of women in management roles.

Mr. Kelley stated that women did not return to the workforce post-covid in the same way men did. He stated that MGM had 300 open positions, most of which were in the food and beverage industry. He stated that there was a weekly hiring fair every Tuesday, and that MGM had increased outreach with external organizations. He stated that MGM benefited from a large network of universities and schools located nearby. Mr. Kelley stated that the last quarterly report showed that 36% of those in management positions were women, and that 44% of those in supervisory positions and above were women.

Commissioner O'Brien stated that there had been allegations that some of MGM's diversity numbers submitted to the Commission had been inflated. Mr. Nosal stated that it would be difficult to discuss ongoing litigation in the public setting.

Commissioner Hill sought further details regarding the DEI program moving diverse candidates to managerial positions. Ms. White stated that MGM launched a mentorship program in 2023 pairing existing leaders with aspiring leaders. She stated that MGM also launched the accelerated leadership program in 2020. Mr. Kelley stated that MGM worked with suppliers with diverse backgrounds to give them assistance in becoming vendors to the property.

The Commission reached consensus that MGM had met the Commission's expectations in regard to this section of the application.

d. [Proposed measures related to responsible gaming \(205 CMR 218.06\(5\)\(c\)\)](#) (3:32:25)

Commissioner O'Brien inquired about what responsible gaming guardrails were in place and asked about the fine given to BetMGM in Canada in April. Mr. Farnes stated that MGM tried to increase awareness and visibility of responsible gaming. He stated that the patrons have access to tools to mitigate gambling related harm through the VSE and internal self-limits. He stated that all team members are trained in responsible gaming facets and where to find resources available on-site.

Commissioner O'Brien asked if there were guardrails related to marketing and advertising. Mr. Farnes stated that MGM follows the AGA code of conduct and best practices for responsible gaming. He stated that training and developing relationships with team members was essential. He stated that MGM wanted to reemphasize its focus on player health and creating a culture of responsibility.

Commissioner O'Brien asked if BetMGM had policies about creating relationships with colleges or universities. Mr. Farnes stated that BetMGM avoids partnerships with collegiate sources to prevent exposure to potentially vulnerable populations.

Sarah Brennan, Senior Director of Compliance for BetMGM, stated that BetMGM was involved at the retail level for ensuring the correct helpline is available to patrons and jurisdictionally specific language was included. She stated that BetMGM was operational in twenty-seven jurisdictions and ensured that their national advertisements comply with each jurisdiction's language.

Ms. Brennan explained that the fine in Ontario was due to human error, as an employee was not fully trained and inadvertently published an advertisement that would be legal in other jurisdictions, but not Ontario. She stated that it was an honest mistake, and that BetMGM worked with Ontario regulators to remove the offending materials and also retrained the BetMGM staff person.

Ms. Brennan stated that BetMGM found it paramount to self-report instances of non-compliance. She stated BetMGM investigates how these instances occur and enact mitigation efforts. She stated that the original \$48,000 fine was lowered to \$32,000 because BetMGM immediately corrected the situation. She stated that BetMGM has not had further marketing compliance issues in other jurisdictions.

Chair Judd-Stein commended MGM Resorts for their adoption of GameSense across the company. Mark Vander Linden, Director of Research and Responsible Gaming, stated that MGM was a leader across gaming companies in terms of responsible gaming. Chair Judd-Stein asked what year MGM chose to adopt GameSense. Mr. Farnes replied that it was in 2017.

Commissioner Skinner asked for details regarding advertising and marketing campaigns BetMGM had launched. Ms. Brennan stated that BetMGM had brand ambassadors, and that BetMGM staff reviewed all scripts for radio and television advertisements. She stated that BetMGM kept affiliates informed of the dos-and-don'ts in the industry.

Commissioner Skinner requested more information regarding third-party affiliates. Ms. Brennan stated that BetMGM was affiliated with sports teams, Buffalo Wild Wings, Action Network, and Yahoo. She stated that these affiliates may advertise a BetMGM offer on their landing page. She stated that all partners who needed to be licensed are licensed. Commissioner Skinner asked if

BetMGM adhered to the AGA advertising guidelines. Ms. Brennan replied that BetMGM did follow the guidelines.

Mr. Miller stated that some of the oversight and review referenced by Ms. Brennan also occurred with the marketing team on-site at MGM. Commissioner Skinner noted that she had asked because the application had referenced the BetMGM application and did not provide expressly stated details.

Chair Judd-Stein noted that RSM had brought up the rewards system, and asked if the MGM and BetMGM rewards systems were integrated. Ms. Brennan stated that reward points earned for online play may be separate from rewards earned for in-person wagering.

The Commission reached consensus that MGM had met the Commission's expectations in regard to this section of the application.

e. [Technology that the applicant intends to use \(205 CMR 218.06\(5\)\(e\)\)](#) (3:55:17)

Chair Judd-Stein asked if GLI had access to BetMGM's application when reviewing the technology section as BetMGM's application was cross-referenced. Mr. Bunevith stated that he had prepared for the evaluation of MGM. Chair Judd-Stein noted that another independent test lab had tested MGM's platform and asked if GLI was familiar with MGM's platform. Mr. Bunevith stated that he was not familiar as GLI had not tested that platform.

Chair Judd-Stein sought clarification regarding the hardware and software for MGM's sportsbook. Mr. Miller stated that BetMGM was a service provider for the hardware and software, and that the technology had met the certifications and requirements of other jurisdictions being tested by the independent test lab, BMM.

Commissioner O'Brien asked how Entain was related to the technology in the application. Ms. Brennan explained that Entain was involved in providing a platform for the mobile operations, which would not be integrated at MGM. She stated that a more thorough description of Entain's involvement would be included in BetMGM's presentation the following week.

Bruce Band, Director of Sports Wagering, stated that GLI would be able to provide certification once they received BMM's report, but that MGM was still gathering the reports. Commissioner O'Brien stated that as the Commission did not have full information the vote should be held until the certification occurs.

Chief Financial and Accounting Officer Derek Lennon clarified that BMM was one of the Commission's certified independent test labs, and that it would meet the regulatory requirement as long as it met the GLI-33 standards. Chair Judd-Stein asked if there was an affirmative statement in the application that the software met the GLI-33 standard. Mr. Miller stated that the



application asserted that the platform met the GLI certification in other jurisdictions, but not Massachusetts.

Chief Information Officer (“CIO”) Katrina Jagroop-Gomes stated that all GLI had to do was certify that the equipment was tested according to the Commonwealth’s standards. She stated that it might be beneficial to have BMM confirm that they test to the GLI-33 standards.

Commissioner O’Brien noted that the checkbox was missing because BMM’s report was not yet available.

Mr. Nosal stated that the GLI certifications were required to receive an operations certificate and stated that receiving an operation’s certificate could be a condition of licensure. He stated that he was confident the system would meet Massachusetts’ standards. Commissioner O’Brien agreed, but noted that confidence was different than corroboration.

Chair Judd-Stein stated that she would like to rely on GLI’s consultant, but she did not have access to the testing for it to be reviewed. Mr. Bunevith stated that independent test labs test to GLI’s standards, but that GLI would ultimately need to certify their report.

Ms. Brennan noted that BetMGM had parallel certificates in other jurisdictions; verifying that the same product to be used at MGM had been found to be in compliance with GLI-33 standards. She stated that the report from the independent lab was to test for Massachusetts specific compliance.

Chair Judd-Stein noted that regulations allowed for the Commission to request that more information be provided. She stated that the Commission expected to receive more information during the BetMGM evaluation. Commissioner O’Brien stated that the application should be supplemented with more specificity in every instance where it referenced the BetMGM application.

Commissioner Skinner noted that the Commission had not received the certificate from GLI regarding Penn Sports Interactive’s application in connection with Plainridge Park Casino’s application. Commissioner O’Brien stated that her concerns stemmed from MGM’s application referencing an answer in BetMGM’s application without attaching that response. She suggested that the Commission’s decision regarding MGM be deferred until the Commission evaluates BetMGM or until MGM supplements their answers. Commissioner Skinner agreed. Mr. Nosal stated that MGM would provide supplemental information. Chair Judd-Stein stated that she was comfortable deferring the decision until more information was received.

Commissioner Maynard asked about the relationship between the window, kiosk, and mobile application and how data flows between those entities. Mr. Rim stated that the data was all stored in a main database, and that the MGM office had individuals who could run a script to pull information from kiosks and patrons wagering at windows. He stated that all of the data would be gathered into a repository system. He stated that data aggregation occurred on a monthly

basis. He stated that the compliance team also could pull information to investigate suspicious activity.

Chair Judd-Stein asked which sections the Commission wanted supplemental information regarding. Commissioner O'Brien stated that section F(3) did not appear to be accurate in connection with MGM and asked that answers be more specific to the retail location with less references to BetMGM.

f. [Suitability of the applicant and its qualifiers \(205 CMR 218.06\(5\)\(f\)\)](#) (4:19:34)

Commissioner O'Brien asked if there were any changes to Mr. Diller's status in terms of suitability. Chief Enforcement Counsel Hall stated that there had not been changes, and that MGM's legal team was aware they would need to provide the Commission staff with ongoing disclosures.

Commissioner O'Brien asked why BetMGM was not listed as an entity qualifier for MGM as they were involved with the moving and setting of lines. Chief Enforcement Counsel Hall stated that the IEB considered existing fully suitable entities and qualifiers in its summary. She stated that BetMGM was acting as a vendor for MGM and as a potential category three operator. She stated that due to timing, the IEB focused on the suitability of category one entities, rather than vendors. She stated that BetMGM's preliminary suitability would be discussed as part of their application.

Chair Judd-Stein asked if that decision was to prevent delay or as a reflection of the law. Chief Enforcement Counsel Hall stated that delay was a consideration, but that the decision was also based in law.

Commissioner O'Brien asked if BetMGM should be considered as a vendor as they were helping to make decisions on the floor. Commissioner Skinner noted that she shared Commissioner O'Brien's concerns. She stated that if the statute did not contemplate category three licenses, then BetMGM would be considered a qualifier of MGM. She stated that if MGM and BetMGM were so significantly intertwined in the operation of the sportsbook, then the Commission would need additional information. Chief Enforcement Counsel Hall stated that for category one operators, the IEB reviewed qualifiers in the ownership chain, and that BetMGM was not in the ownership chain of MGM.

Executive Director Karen Wells stated that it appeared that BetMGM was being treated as a vendor as well as a tethered operator. She stated that the application did not seem to have much information regarding BetMGM's vendor role. Chair Judd-Stein expressed that she did not want to second-guess the qualification process. Commissioner O'Brien stated that she was concerned that a vendor as prominent as BetMGM did not rise to the level of entity qualifier in the four corners of the application.

Chair Judd-Stein stated that the Commission needed more information regarding Section G of the application. Commissioner Skinner stated that the Commission would likely need to wait until BetMGM's presentation to deliberate on this application. Commissioner Maynard stated that he agreed with Commissioner O'Brien and stated that the Commission needed more information regarding BetMGM's services.

Chief Enforcement Counsel Hall noted that for category three applications, the IEB was providing a preliminary review for suitability based upon the applicants' submissions and an open-source check of the applicants and qualifiers. She noted that it was not a full investigation.

Commissioner Maynard noted that the Commission needed more details regarding revocations and denials of the category three applicant. He stated that the answer in MGM's application was limited to MGM and did not include BetMGM. Mr. Nosal stated that MGM would accommodate the Commission's need for additional information.

The Commission reached a consensus that MGM should provide further details wherever BetMGM was referenced in its MGM's application.

Commissioner Maynard stated that the call of the question in the compliance section of the application asked for information from any jurisdiction, not limited to individuals or location. Mr. Nosal stated that he understood now that the definition may have been more expansive than his initial interpretation.

6. [Executive Session](#) (4:44:29)

Chair Judd-Stein noted that she had not heard any requests to enter executive session. Commissioner O'Brien stated that one issue that might require executive session was the information relating to the accuracy of the diversity numbers reported to the Commission. Mr. Nosal stated that MGM had been transparent, but agreed that it was not appropriate to discuss the ongoing litigation in a public forum.

Chair Judd-Stein stated that there might not be a conduit for an executive session with that question. General Counsel Grossman stated that the question did not meet the parameters of G.L. Chapter 23N exception. He stated that the litigation exception also would not apply as the question was related to MGM's ongoing litigation and not the Commission's. He stated that he would give this issue more thought before returning to this application question.

7. [Other Business](#) (4:48:35)

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

Commissioner O'Brien moved to adjourn. The motion was seconded by Commissioner Maynard

*Roll call vote:*

*Commissioner O'Brien: Aye.*

*Commissioner Hill: Aye.*

*Commissioner Skinner: Aye.*

*Commissioner Maynard: Aye.*

*Chair Judd-Stein: Aye.*

*The motion passed unanimously, 5-0.*

**List of Documents and Other Items Used**

1. [Notice of Meeting and Agenda](#) dated November 30, 2022



*Division of Racing*

TO: Jordan Maynard, Interim Chair  
Eileen O'Brien, Commissioner  
Bradford Hill, Commissioner  
Nakisha Skinner, Commissioner

FROM: Alexandra Lightbown, Director of Racing

CC: Dean Serpa, Executive Director  
Todd Grossman, General Counsel

DATE: June 20, 2024

RE: Payment to the Jockeys' Guild from pari-mutuel  
taxes for 2023

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M.G.L. Chapter 128A Section 5 (h) (4) details how part of the pari-mutuel taxes paid to the Massachusetts Gaming Commission are to be used: "To pay: ...\$65,000 annually to an organization, as determined by the commission, that represent the majority of jockeys who are licensed by the commission and regularly ride in the commonwealth for the purpose of providing health and other welfare benefits to active, disabled or retired jockeys..."

For years, the organization that has represented these jockeys has been the Jockeys' Guild. Suffolk Downs did not conduct any live racing after 2019. They continue to simulcast, and there is still enough revenue to pay the \$65,000.

- At the February 25, 2021 Commission meeting, the Massachusetts Gaming Commission reviewed the statute, considering there was no more live racing at Suffolk Downs beginning in 2020.
- The Commissioners then voted unanimously to approve the Jockeys' Guild as the organization who represented the majority of the jockeys licensed by the Massachusetts Gaming Commission and who regularly rode in the commonwealth.
- The Commission requested that the Jockeys' Guild and I review the qualifications for jockeys to receive the benefits. The new qualifications were presented at the April 8, 2021 meeting. I stated I had no objections to them. The Commissioners also had no objections to the new qualifications. The \$65,000 was paid to the order of the Jockeys' Guild, who then dispersed it to the jockeys who qualified.



Massachusetts Gaming Commission

- Mindy Coleman, Attorney for the Jockeys' Guild, and I reviewed the qualifications again in 2022 for the 2021 payments and in 2023 for the 2022 payments and saw no reason to change them. The MGC approved the Jockey' Guild as the representative organization, the money was paid to them, and they dispersed it to the jockeys who qualified.
- Attorney Coleman and I have reviewed the qualifications again for the 2023 payments, and once more see no reason to change them.

**Recommendation: That the Commission approves the Jockeys' Guild as the organization that represent the majority of jockeys for the purposes of M.G.L. Chapter 128A Section 5 (h) (4).**



Massachusetts Gaming Commission



June 13, 2024

Dr. Alexandra Lightbown  
Massachusetts Gaming Commission  
101 Federal Street 12<sup>th</sup> Floor  
Boston, MA 02110  
*Sent via email* alexandra.lightbown@state.ma.us

RE: Request of Funds under MLGA 128A §5(h)(4)

Dear Dr. Lightbown,

On behalf of the Jockeys' Guild, the organization which represents professional jockeys in American Thoroughbred and Quarter Horse racing and has approximately 1,050 active, retired, and permanently disabled members, we are respectfully requesting to be included on the agenda for the Commission meeting scheduled for June 20, 2024. The purpose of the request is to request the Commission's consideration for distribution of the funds under MLGA 128A §5(h)(4) which authorizes for \$65,000 annually to be paid to the "organization, as determined by the commission that represents the majority of the jockeys who are licensed by the commission and regularly ride in the commonwealth for the purpose of providing health and welfare benefits to active, disabled or retired jockeys."

In June of 2023, the members of the Commission elected to continue to recognize the Guild as the "organization who represents the majority of the jockeys" for purposes of receiving and distributing the funds under MLGA 128A §5(h)(4). In 2021, the Guild provided proposed qualifications for retired and permanently disabled jockeys who were regular jockeys within the Commonwealth of Massachusetts. We would respectfully request that the previous submitted qualifications, as attached herein, still be applicable. As racing has yet to resume in Massachusetts, nor is scheduled for 2024, there are still not any qualifications for active jockeys.

Based on the previously approved qualifications, there would be approximately 15 jockeys who would be eligible to receive the benefit, including 11 retired and 4 permanently disabled jockeys. Please note, that is subject to change based on circumstances of individuals and potential changes in classification.

As has been done in the past, the distribution amount would be based on pro rata share of the \$65,000 to the qualifying individuals. It is the intention of the Guild that these monies be used to reimburse jockeys for their medical expenses. This can include any out of pocket expenses for health care premiums, deductibles, medical expenses and/or prescription expenses, dental expenses and/or temporary disability insurance policy premiums.

The Guild sincerely appreciates the Commission's previous approval and continued consideration regarding the distribution of funds for the benefit of the qualifying jockeys. If there are any questions or concerns that need to be addressed prior to the Commission meeting, please feel free to contact me in the office at (859) 523-5625 or via email at [mcoleman@jockeyguild.com](mailto:mcoleman@jockeyguild.com).

Sincerely,

Mindy L. Coleman  
Counsel

**MASSACHUSETTS JOCKEYS HEALTH AND WELFARE DISTRIBUTION  
ELIGIBILITY QUALIFICATIONS  
Effective April 1, 2021**

***RETIRED MEMBER QUALIFICATIONS***

The JOCKEY is eligible if the following qualifications are met:

1. Must have been a member of the Jockeys' Guild, AND
2. Retired from racing on or after January 1, 2008, AND
3. Must have ridden in the State of Massachusetts since January 1, 2008, AND
4. Must have ridden at least two thousand five hundred (2,500) career mounts in legal pari-mutuel races conducted by the State of Massachusetts OR ten (10) years as a licensed Massachusetts jockey.
5. For the purposes of this section, an individual, who meets the aforementioned qualifications, shall be considered to be retired from racing if the individual has ridden in fewer than fifty (50) races, in the previous calendar year, at any track in the United States licensed to conduct pari-mutuel wagering.

***PERMANENTLY DISABLED QUALIFICATIONS***

A QUALIFYING JOCKEY is eligible if the following qualifications are met:

1. Must have been a member of the Jockeys' Guild at the time of the injury, AND
2. Must not hold a license as a jockey in any racing jurisdiction, AND
3. Must have suffered a career-ending injury at a Massachusetts racetrack recognized by the Massachusetts Gaming Commission OR must achieve the retired member qualifications if injured at a track outside of Massachusetts, AND
4. Must be permanently disabled under the Social Security Act and must qualify for Medicare benefits under Part A, B, and D.

***It is the intention of the Guild that these monies be used to reimburse jockeys for their medical expenses. This can include any out of pocket expenses for health care premiums, deductibles, medical expenses and/or prescription expenses, dental expenses and/or temporary disability insurance policy premiums.***

***The above qualifications are effective as of 2021 and will remain effect until further notice when live racing returns to Massachusetts. Jockeys' Guild reserves the right to make modifications to the qualifications once live racing resumes in Massachusetts.***

***Funding for this benefit is only available upon receipt of the monies from the Massachusetts Gaming Commission.***





TO: Interim Chair Maynard, Commissioners O'Brien, Hill, and Skinner

FROM: Mark Vander Linden, Director of Research and Responsible Gaming,  
Bonnie Andrews, Research Manager

CC: Dean Serpa, Executive Director

DATE: June 20, 2024

RE: Impacts of Advertising on Gambling Behavior in Massachusetts

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The Expanded Gaming Act enshrines the role of research in understanding the social and economic effects and mitigating the negative consequences of casino gambling in Massachusetts. To this end, with the advice of the Gaming Policy Advisory Committee, the Commission is charged with carrying out an annual research agenda to comprehensively assess the impacts of casino gambling in Massachusetts. Specifically, [M.G.L. Chapter 23K §71](#) directs the research agenda to examine the social and economic effects of expanded gambling and to obtain scientific information relative to the neuroscience, psychology, sociology, epidemiology, and etiology of gambling. [M.G.L. Chapter 23N, §23](#) extends the scope of the research agenda to include an understanding of the effects of sports wagering in the commonwealth.

The Commission has an Interagency Service Agreement (ISA) with the University of Massachusetts, Amherst to carry out social and economic research. Since 2013, the team of researchers, collectively known as Social and Economic Impacts of Gambling in Massachusetts (SEIGMA), has produced a range of studies to inform the Commission and stakeholders about the impacts of expanded gaming.

Prior to the legalization of sports wagering in the Commonwealth, the MGC Research and Responsible Gaming team produced a [white paper](#), *Responsible Gaming Considerations for Gambling Advertising*, which gave an overview of relevant research and regulations and provided the Commission with considerations for additional strategies and measures regarding gambling advertising.

The purpose of this report, prepared by researchers from the SEIGMA team at UMass Amherst, is to assist the MGC to understand the likely impacts of gambling advertising, determine the extent to which gambling behavior and gambling problems in Massachusetts are influenced by gambling advertising, and provide recommendations for how to prevent or mitigate harm resulting from gambling advertising in Massachusetts.

Attached are the final report, a research snapshot, and the presentation.



Massachusetts Gaming Commission

# MGC Research Snapshot

## Impacts of Advertising on Gambling Behavior in Massachusetts

June 2024

### What you need to know

Advertising has substantial impacts on attitudes toward and consumption of addictive products, including gambling. Review of available data raises concerns about the impact of gambling advertising on vulnerable groups in the Massachusetts population such as individuals who are underage and individuals in recovery from gambling problems. Recommendations to prevent and mitigate harm include limitations on gambling advertising including types of games, advertising focused on specific purposes, and celebrity endorsements; restrictions on inducements; and monitoring emerging forms of gambling advertising.

### What is this research about?

Advertising regulations exist to prevent known or assumed harm caused by use of the advertised products. Many jurisdictions have implemented tobacco and alcohol advertising restrictions to control exposure to these types of advertising. An abundance of research into the impacts of alcohol and tobacco advertising exists, but relatively few studies have examined the relationship between gambling advertising and the potential impacts on gambling behavior that may lead to increased harm. This is an increasing concern given the rapid introduction of sports betting in the U.S. and a quickly evolving shift of both gambling and advertising to predominantly online platforms.

The purpose of this report, prepared by researchers from the Social and Economic Impacts of Gambling in Massachusetts (SEIGMA) team at UMass Amherst, is to assist the Massachusetts Gaming Commission (MGC) to understand the likely impacts of gambling advertising, determine the extent to which gambling behavior and gambling problems in Massachusetts are influenced by gambling advertising, and provide recommendations for how to prevent or mitigate harm resulting from gambling advertising in Massachusetts.

### What did the researchers do?

The report is organized into several sections. These include:

- A brief overview of research on the impacts of advertising related to tobacco and alcohol, two other potentially harmful products of consumption;
- A summary of existing research on the relationship between gambling advertising and gambling behavior;
- Results from three online panel surveys of Massachusetts adults completed in 2014, 2022 and 2023 to help understand the extent to which

- gambling behavior in Massachusetts may be influenced by gambling advertising; and
- Recommendations to mitigate or prevent harm resulting from gambling advertising in Massachusetts.

This report contains lessons from the extensive literature that already exists on the impacts of advertising generally, as well as what is known specifically about the impacts of advertising on gambling behavior. Data from the three SEIGMA online panel surveys is useful in highlighting the potential impacts of gambling advertising in Massachusetts. Readers are cautioned that the results of online panel surveys, which typically include high proportions of regular gamblers, cannot be generalized to the population but are informative regarding the direction of changes in the behavior of populations.

### What did the researchers find?

#### Lessons from Existing Research

Advertising has substantial impacts on attitudes toward and consumption of addictive products, including gambling. Advertising of these products generally emphasizes the positive experiences of use while downplaying the potentially negative aspects; further, the amount of advertising of such products far outstrips the amount of advertising about the risks of consumption or the availability of help for problems associated with consumption. The recent and rapid shift in advertising to digital channels and the evolution of highly targeted approaches to individual consumers raises further concerns about the potential negative effects of widespread gambling advertising.

#### Online Panel Surveys in Massachusetts

While the results of online panel surveys cannot be generalized to the population, the data are useful in the early detection of possible negative impacts.



The panel surveys carried out in Massachusetts included much larger numbers of people who gamble, including people who gamble and are at risk of and experiencing problems, than the general population surveys conducted in the same time periods. Surveys found:

- While past year sports betting participation declined in the general population between 2013 and 2021, past year sports betting among the online panelists increased from 2014 to 2022 and rose again in 2023.
- The proportion of past year sports bettors in the online panels who participated at least monthly or weekly also increased, from 51% in 2014 to 71% in 2022 and to 80% in 2023.
- With respect to the impacts of gambling advertising, only a small proportion of online panelists in Massachusetts in 2023 (7.1%) felt that such advertising or news coverage had caused them to gamble more. It is notable, however, that online panelists at risk of or experiencing gambling problems were more likely to recall substantial amounts of advertising and news coverage and more likely to believe that this exposure had led them to gamble more.

Taken together, this information raises concerns about the impact of gambling advertising on vulnerable groups in the population. While many jurisdictions have implemented regulations to limit the exposure of underage individuals to gambling advertising, few have addressed the vulnerability of individuals in recovery from gambling problems and their susceptibility to relapse in response to gambling advertising or news coverage. Another concern is the scarcity of population-level approaches to minimizing and mitigating gambling harms and the nearly exclusive focus on individual responsibility for gambling behavior.

## Conclusions and Recommendations

The MGC published a report on advertising and gambling in 2022 that included specific recommendations to strengthen current gambling advertising regulations:

- Strengthening protections of underage populations;
- Restricting advertising campaigns that target vulnerable groups;
- Requiring inclusion of messages about where to obtain help in all advertising and marketing materials;
- Limiting the intensity and frequency of advertising;
- Ensuring that restrictions include digital media and third parties;
- Prohibiting false or misleading advertising; and
- Restricting communications about inducements, bonuses and credits.

The researchers strongly agreed with all of these recommendations and additionally recommend:

- Limiting advertising of higher-risk games;
- Limiting advertising focused on specific purposes (e.g., gambling as entertainment, gambling to support good causes);

## About the researchers

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- Requiring that inducements not create a sense of urgency, be limited in value, and be offered only when customers are opening an account;
- Restricting celebrity endorsements, as these tend to promote subsequent gambling involvement by young people; precipitate relapse in people in recovery from gambling addiction; and counteract the effectiveness of public health messages advocating limited use.

Finally, the researchers recommend monitoring emerging forms of gambling advertising, including:

- Regularly obtaining information about trends, tactics and engagement with gambling-related advertising, marketing and influencer promotion strategies;
- Measuring the potential reach of gambling-related posts on social media platforms; and
- Assessing the prevalence and effectiveness of gambling prevention and treatment messages within the broader social media landscape.

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Social Impact; Gambling Advertising

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## About this Snapshot

MGC Snapshots are intended to translate lengthy and sometimes technical reports into an easily understandable overview of the research. The findings and recommendations in the Snapshot are those of the researchers and do not necessarily reflect the position of the MGC.



# Impacts of Advertising on Gambling Behavior in Massachusetts



May 31, 2024

**SEIGMA**  SOCIAL AND ECONOMIC IMPACTS  
OF GAMBLING IN MASSACHUSETTS

UNIVERSITY OF MASSACHUSETTS SCHOOL OF PUBLIC HEALTH AND HEALTH SCIENCES

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# Authorship and Acknowledgements

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## Authorship

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**Robert J. Williams**, Professor in the Faculty of Health Sciences at the University of Lethbridge in Alberta, Canada, and Co-Principal Investigator on the SEIGMA project. Dr. Williams contributed to all sections of the report.

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We would like to thank the members of the Massachusetts Gaming Commission's Research Review Committee (RRC). Members of this committee represent a range of perspectives and their careful review of draft versions of this report contributed to its clarity as well as utility to multiple audiences.

As always, we thank the Massachusetts Gaming Commission for their continued vision and guidance over the course of the SEIGMA project. The Commission's broad vision for the expansion of gambling in Massachusetts and commitment to the research needed to maximize the benefits and minimize the harms related to gambling in the Commonwealth made this project possible.

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# Executive Summary

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The purpose of this report is to assist the Massachusetts Gaming Commission to understand the likely impacts of gambling advertising, determine the extent to which gambling behavior and gambling problems in Massachusetts are influenced by gambling advertising, and provide recommendations for how to prevent or mitigate harm resulting from gambling advertising in Massachusetts. The information presented in this report is important given the recent legalization of sports betting in the Commonwealth and its rapid implementation.

Much of the material in this report distills lessons from the extensive literature that already exists on the impacts of advertising generally, and what is known specifically about the impacts of advertising on gambling behavior. Data from three online panel surveys carried out in Massachusetts between 2014 and 2023 is useful in highlighting the potential impacts of gambling advertising in Massachusetts. Readers are cautioned that the results of online panel surveys, which typically include high proportions of regular gamblers, cannot be generalized to the population but are informative regarding the direction of changes of behavior in populations.

Advertising regulations exist to prevent known or assumed harm caused by use of the advertised products. Many jurisdictions have implemented tobacco and alcohol advertising restrictions to control exposure to these types of advertising. An abundance of research into the impacts of alcohol and tobacco advertising exists but relatively few studies have examined the relationship between gambling advertising and the potential impacts on gambling behavior that may lead to increased harm. This is an increasing concern given the rapid introduction of sports betting in the U.S. and a quickly evolving shift of both gambling and advertising to predominantly online platforms.

Advertising has undergone profound changes since the advent of the Internet in the 1990s. Prior to the 1990s, advertising outlets included print media, location advertising such as billboards, and radio and television broadcasting. In the 21<sup>st</sup> century, numerous forms of online advertising and marketing have emerged, with profound implications for the effectiveness of advertising campaigns as well as potential impacts on vulnerable groups in the population.

Within this new ecosystem, spending on sports betting advertising expanded dramatically in the U.S. following the demise of the Professional and Amateur Sports Protection Act (PASPA) in 2018. In 2019, the first full year of expanded regulated sports betting, spending on national **television** advertising by sportsbook operators totaled \$21.4 million; in 2022, that figure had increased by 1,300% to \$314.6 million. Spending on **online** advertising of gambling in the U.S. nearly doubled from a total of \$1 billion in 2021 to \$1.8 billion in 2022 and an estimated \$1.9 billion in 2023. This spending was intended to enable sports betting operators to quickly acquire as many new customers as possible. Despite widely voiced concerns, there are few restrictions on the volume or placement of sports betting advertisements and even fewer instances of regulators punishing companies for violations. Other countries, primarily in Europe, have been more aggressive in protecting consumers by strictly regulating gambling advertising.

As of March 2024, 38 U.S. states and the District of Columbia offered sports betting through a variety of platforms from retail only to online sportsbooks. The majority of states with legal sports betting have some type of advertising restrictions in place. The most common requirement is that gambling advertisers feature a toll-free problem gambling helpline number across different media. Most states also restrict gambling advertisers



from targeting individuals under the legal gambling age or those on gambling self-exclusion lists. Beyond these measures, there are few restrictions on advertising by sports betting operators. Several organizations in the U.S., including the American Gaming Association and the newly formed Coalition for Responsible Sports Betting Advertising, have proposed voluntary industry guidelines to encourage responsible sports gambling advertising.

An important part of the mission of the Massachusetts Gaming Commission (MGC) is to minimize and mitigate potentially negative or unintended consequences of casino gambling, horse race gambling and, since 2022, sports betting including through requirements for responsible advertising. In support of the MGC's mission, this report assesses evidence on whether and how gambling advertising has an impact on gambling behavior and makes recommendations to minimize gambling-related harm in Massachusetts associated with the introduction of sports betting. Much of this analysis distills lessons from the extensive literature that already exists on the impacts of advertising generally, and what is known specifically about the impacts of advertising on gambling behavior. Available primary data from the 2014, 2022 and 2023 SEIGMA online panel surveys was mined for empirical evidence of impacts that have occurred in Massachusetts.

Based on the research, it is clear that advertising has substantial impacts on attitudes toward and consumption of addictive products, including gambling. Advertising of these products generally emphasizes the positive experiences of use while downplaying the potentially negative aspects; further, the amount of advertising of such products far outstrips the amount of advertising about the risks of consumption or the availability of help for problems associated with consumption. The recent and rapid shift in advertising to digital channels and the evolution of highly targeted approaches to individual consumers raises further concerns about the potential negative effects of widespread gambling advertising.

While the results of online panel surveys cannot be generalized to the population, the data are useful in the early detection of possible negative impacts. The panel surveys carried out in Massachusetts included much larger numbers of gamblers, including gamblers at risk of and experiencing problems, than the general population surveys conducted contemporaneously. While past year sports betting participation declined in the general population between 2013 and 2021, past year sports betting among the online panelists increased from 2014 to 2022 and rose again in 2023. It is also notable that the proportion of past year sports bettors in the online panels who participated at least monthly or weekly also increased, from 51% in 2014 to 71% in 2022 and to 80% in 2023. With respect to the impacts of gambling advertising, only a small proportion of online panelists in Massachusetts in 2023 (7.1%) felt that such advertising or news coverage had caused them to gamble more. It is notable, however, that online panelists at risk of or experiencing gambling problems were more likely to recall substantial amounts of advertising and news coverage and more likely to believe that this exposure had led them to gamble more.

Taken together, review of the research literature and consideration of the online panel data from Massachusetts raise concerns about the impact of gambling advertising on vulnerable groups in the population. While many jurisdictions have implemented regulations to limit the exposure of underage individuals to gambling advertising, few have addressed the vulnerability of individuals in recovery from gambling problems and their susceptibility to relapse in response to gambling advertising or news coverage. Another concern is the dearth of population-level approaches to minimizing and mitigating gambling harms and the nearly exclusive focus on individual responsibility for gambling behavior.

The MGC published a report on advertising and gambling in 2022 that included specific recommendations to strengthen current gambling advertising regulations in Massachusetts. These comprise:

- Strengthening protections of underage populations;
- Restricting advertising campaigns that target vulnerable groups;

- Requiring inclusion of messages about where to obtain help in all advertising and marketing materials;
- Limiting the intensity and frequency of advertising;
- Ensuring that restrictions include digital media and third parties;
- Prohibiting false or misleading advertising; and
- Restricting communications about inducements, bonuses and credits.

We strongly concur with all of the recommendations in the MGC’s White Paper and, based on a recent international review, have several additional recommendations to propose for the MGC’s consideration:

- Limiting advertising of higher-risk games;
- Limiting advertising focused on specific purposes (e.g., gambling as entertainment, gambling to support good causes);
- Requiring that inducements not create a sense of urgency, be limited in value, and be offered only when customers are opening an account;
- Restricting celebrity endorsements as these:
  - Tend to promote subsequent gambling involvement by young people;
  - Precipitate relapse in recovered addicts; and
  - Counteract the effectiveness of public health messages advocating limited use.

Finally, given the rapid evolution of advertising beyond conventional formats to encompass online marketing, we recommend that consideration be given to monitoring emerging forms of gambling advertising, including:

- Regularly obtaining information about trends, tactics and engagement with gambling-related advertising, marketing and influencer promotion strategies;
- Measuring the potential reach of gambling-related posts on social media platforms; and
- Assessing the prevalence and effectiveness of gambling prevention and treatment messages within the broader social media landscape.

# Introduction

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## Purpose of the Report

The purpose of this report is to assist the Massachusetts Gaming Commission (MGC) to understand the likely impacts of gambling advertising, determine the extent to which gambling behavior and gambling problems in Massachusetts are influenced by gambling advertising, and provide recommendations for how to prevent or mitigate harm resulting from gambling advertising in Massachusetts. The information presented in this report is important given the recent legalization of sports betting in the Commonwealth and its rapid implementation.

The report is organized into several sections. These include:

- brief overview of research on the impacts of advertising related to tobacco and alcohol, two other potentially harmful products of consumption;
- summary of existing research on the relationship between gambling advertising and gambling behavior;
- description of results from three online panel surveys of Massachusetts adults completed in 2014, 2022 and 2023 to help understand the extent to which gambling behavior in Massachusetts may be influenced by gambling advertising; and
- recommendations to mitigate or prevent harm resulting from gambling advertising in Massachusetts.

Much of the material in this report distills lessons from the extensive literature that already exists on the impacts of advertising generally, and what is known specifically about the impacts of advertising on gambling behavior. Available primary data from the three SEIGMA online panel surveys is useful in highlighting the potential impacts of gambling advertising in Massachusetts. Readers are cautioned that the results of online panel surveys, which typically include high proportions of regular gamblers, cannot be generalized to the population but are informative regarding the direction of changes in the behavior of populations.

## Background

Advertising strategies aim to increase the use of a product in a population or, sometimes, specific groups in the population, thereby increasing corporate profits. Regulations around advertising exist to prevent known or assumed harm caused by using the advertised products. For example, many jurisdictions have implemented tobacco and alcohol advertising restrictions to control exposure to these types of advertising, particularly for young people.<sup>1</sup> An abundance of research into the impacts of alcohol and tobacco advertising exists; however, few studies have examined the relationship between gambling advertising and the potential impacts on gambling behavior that may lead to increased harm. This is a growing concern internationally given the recent introduction of sports betting to the gambling

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<sup>1</sup> Other types of marketing of commercial activities that are regulated to prevent harm include marketing of unhealthy foods (Taillie et al., 2019), direct-to-consumer marketing of prescription drugs (Parekh & Shrank, 2018), and electronic cigarette products (Hansen et al., 2020).

landscape in the U.S. and a rapid shift internationally of both gambling and advertising to predominantly online platforms.

Gambling advertising has been a concern in Massachusetts since the legalization of casinos in 2011. Following passage of the [Expanded Gaming Act](#), two casinos and one slot parlor were approved by the MGC. Beginning in 2015, when casino gambling became operational in Massachusetts, the MGC moved to enact advertising regulations with the purpose of mitigating gambling harms. The Code of Massachusetts Regulations Title 205<sup>2</sup> states, “No gaming licensee shall authorize or conduct marketing, advertising, and/or promotional communications or activity relative to gaming that specifically targets persons younger than 21 years old” and also states, “A gaming licensee shall not market to individuals on the voluntary self-exclusion list.”

In 2016, Massachusetts became the one of the first states to regulate daily fantasy sports betting (DFS) in the wake of a massive national advertising campaign by DraftKings and FanDuel, who spent hundreds of millions of dollars to recruit customers during the first weeks of the 2015 NFL season.<sup>3</sup> At that time, DraftKings and FanDuel controlled approximately 95% of the North American DFS market which was valued at \$2.5 billion (O’Keeffe, 2015). The statute that governs DFS betting in Massachusetts is the responsibility of the Office of the Attorney General and is primarily focused on oversight of the industry and consumer protection. The Code of Massachusetts Regulations Title 940<sup>4</sup> requires DFS operators to comply with existing advertising regulations in the Commonwealth but places additional restrictions on these operators related to targeting minors and college students, bans contests based on college or amateur sports events, limits monthly deposits by participants, and restricts employees of DFS operators from participating in DFS contests.

In August, 2022, an [Act to Regulate Sports Wagering](#) was passed by the Massachusetts Legislature and signed into law by Governor Charlie Baker. This legislation allows for up to 15 sports betting licenses in the Commonwealth with nine of the licenses tied to a land-based partner (three licensed casinos and two racetracks) and the remaining six online licenses open to competitive bidding. Individuals physically located in Massachusetts can wager on most professional sports leagues but cannot bet on in-state college teams unless the teams are playing in a tournament with four or more teams. The MGC is responsible for overseeing the establishment and regulation of the Massachusetts sports betting industry.

An important part of the MGC’s mission is to minimize and mitigate potentially negative or unintended consequences of casino gambling, horse race gambling and, since 2022, sports betting including through requirements for responsible advertising. Beyond regulations, the MGC has developed a Responsible Gaming Framework to inform the Commission’s approach to responsible gambling as it regulates different forms of gambling in the state (Massachusetts Gaming Commission, 2018). The Framework details the Commission’s intentions to support responsible gambling by encouraging licensees to prevent underage gambling, promote positive play, and advertise problem gambling help resources.

Sports betting became operational in Massachusetts in early 2023 and the MGC is actively constructing a regulatory structure to manage this new form of gambling. The MGC has already produced a White Paper on advertising and gambling that reviews the limited research on gambling advertising and current state-specific advertising regulations around sports betting. Regulations and practices from the Federal Trade Commission’s

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<sup>2</sup> <https://www.mass.gov/law-library/205-cmr>

<sup>3</sup> Fantasy sports betting involves bettors assembling virtual teams that accumulate points based on players’ performances. It is widely considered a game of skill rather than a form of gambling.

<sup>4</sup> <https://www.mass.gov/doc/940-cmr-3-consumer-protection-general-regulations/download>

initiatives for regulating the alcohol industry and the Massachusetts Cannabis Control Commission's advertising regulations were also reviewed to provide insight into other approaches to the regulation of advertising of potentially harmful products (Vander Linden et al., 2022). The White Paper included recommendations for the MGC to consider to strengthen current gambling advertising regulations in the Commonwealth. These included expanding specific advertising/marketing requirements, establishing a compliance process, requiring awareness and capacity building training, updating the MGC's responsible gambling framework, and conducting research to inform regulations, training, and problem gambling programs.

## Recent Developments in Gambling Advertising

The various sectors of the gambling industry rely on advertising to maintain or increase sales of their products and services. These efforts typically portray gambling in positive ways and convey the message that gambling is fun and exciting as well as offering the possibility of winning. There is disagreement among researchers regarding the long-term impact of gambling advertising on attitudes towards gambling, with some arguing that advertising has a strong impact on consumer preferences while others argue that advertising mostly affects market shares of individual companies or product sectors (Abbott et al., 2018).

Advertising has undergone profound changes since the advent of the Internet in the 1990s. Advertising outlets prior to the late 1990s included print media, location advertising such as billboards, and radio and television broadcasting. In the 21<sup>st</sup> century, at least six forms of online advertising have emerged. While these categories overlap, they feature different approaches and actors in the 'advertising ecosystem' (Hörnle et al., 2019):

- digital display marketing placed by ad exchanges (banner advertising, pop-ups);
- search engine marketing (based on keywords or search optimization);
- advertising on social media (both offered and placed by social media companies and including banners, pop-ups, posts, commercial tweets, video-clips, ads placed by ad exchanges);
- use of affiliates, influencers, and brand ambassadors promoting specific products or services;
- advertising placed on social media as user-generated content (posts, tweets, video promotions); and
- affiliate advertising through websites such as comparison shopping sites (advertorials).

In a recent presentation, Stark and McKnight (2024) distinguished between **gambling advertising** (e.g., promotions on television, radio, websites, social media and billboards) and **gambling inducements** (e.g., bonuses, credits, rewards, or vouchers) which are highly targeted and require specific actions to redeem the offer such as gambling with a certain amount of one's own money. These researchers argued that advertising leads people to have more positive feelings about gambling and higher intentions to gamble; people who are at higher risk of gambling harm tend to be more exposed to and aware of gambling advertising and are more likely to say that advertising has caused them to gamble more. Inducements are more likely to lead people to increase gambling deposits, wagers and number of gambling days shortly after their use, and are associated with greater gambling involvement, particularly among young people.

With respect to sports betting, while U.S. states regulate how sportsbooks can operate, these operators are given wide latitude over what they can say in advertisements and even where they can place advertisements. Promotions offering 'risk free' bets and bonuses are one of the more controversial aspects of the boom in sports betting marketing. Another controversial feature of sports betting advertising relates to professional sports celebrities promoting gambling companies (Cohen, 2023; Groke, 2022). In addition to promotions, sports betting operators have established partnerships with major sports leagues; for example, several Major League Baseball stadiums have added sportsbooks to their ballparks to allow spectators to place bets on the teams they are there to support (Groke, 2022). Even more controversially, sports betting operators have established partnerships with colleges and universities that provide them with access to underage students as well as those who are able to bet on sports legally (Betts et al., 2022). Television broadcasts now routinely display odds during

games and announcers discuss betting strategies as well as commenting on game action (Hernandez, 2022). This latitude is a strong contrast to constraints placed on other industries where there is a risk of addiction, such as tobacco and alcohol. Limited oversight has raised alarms among advocates concerned about those with a history of problem gambling and people too young to bet (Hörnle et al., 2019).

### Economics of Gambling Advertising

Globally, spending on advertising was expected to be \$763.2 billion in 2022 (excluding U.S. political advertising). Digital advertising has accelerated especially quickly as small businesses and digital companies spend more on advertising. Currently, between 80% and 90% of digital advertising outside of China goes to Google, Facebook, and Amazon and a growing share of this advertising is viewed during searches conducted on e-commerce platforms (Graham, 2021).

Spending on sports betting advertising expanded dramatically in the U.S. following the 2018 overturning of the Professional and Amateur Sports Protection Act (PASPA)<sup>5</sup> and the expansion of state-sanctioned legal sports betting. In 2019, the first full year of regulated sports betting in the U.S., spending on national **television** advertising by sportsbook operators totaled \$21.4 million; in 2022, that figure had increased by 1,300% to \$314.6 million (Purdum, 2023; Thomsen, 2023). Spending on **online** advertising of gambling in the U.S. nearly doubled from \$1 billion in 2021 to \$1.8 billion in 2022 and an estimated \$1.9 billion in 2023 (Statista, 2023).

In 2023, the four biggest sportsbooks (FanDuel, DraftKings, BetMGM and Caesars) accounted for almost 90% of sports betting advertisements with 41% of views occurring outside of sports event programming (GGB News, 2023; iGB Editorial Team, 2023). While some of this spending was for conventional advertising on national television and deals with sports leagues and venues, most of the spending was on digital advertising. In January 2022, these four sportsbooks spent \$25.6 million on streaming, display and social advertising which are much more targeted approaches to gaining and keeping customers. Spending on advertising was intended to quickly acquire as many new customers as possible. For example, FanDuel spent more than \$1 billion on marketing and promotions in 2022 to acquire a 40% market share in the U.S. with each new user estimated to cost approximately \$45 to acquire (Ruiz et al., 2022).

### Current Status of Gambling Advertising Regulations in the U.S.

Questionable promotional claims and saturation advertising have led to public backlash amid concerns about harms to vulnerable groups, including children and individuals at risk of experiencing gambling harm (Ruiz et al., 2022). Despite these concerns, there are few restrictions on the volume or placement of sports betting advertisements and even fewer instances of regulators punishing companies for violations. Other countries have been more aggressive in protecting consumers by more strictly regulating advertisements. For example, Britain prohibits gambling advertisements during games, celebrity endorsements of sports betting, and the use of credit cards for gambling.<sup>6</sup> Spain, Italy and Australia have also restricted gambling advertisements, promotions and endorsements. Despite stricter measures, a recent study of gambling messages across television, radio and social media channels during the Premier League tournament in Britain found that 92% of these messages were not clearly identifiable as advertisements, only 20.6% included any harm reduction messages and only 18.7% featured age warnings (Mulligan, 2023).

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<sup>5</sup> The 1992 Professional and Amateur Sports Protection Act (PASPA) prohibited states from sanctioning or sponsoring sports gambling. PASPA was struck down by the Supreme Court in May, 2018 and numerous states have now legalized sports betting.

<sup>6</sup> Betting on sports using credit cards is allowed in approximately 15 U.S. states.

As of March 2024, 38 U.S. states and the District of Columbia offered sports betting through a variety of platforms from retail only to online sportsbooks.<sup>7</sup> The majority of states with legal sports betting have some type of advertising restrictions in place. The most common requirement is that gambling advertisers feature a toll-free problem gambling helpline number across different media. Most states also restrict gambling advertisers from targeting individuals under the legal gambling age in that state or those on gambling self-exclusion lists. Other requirements include prohibiting false or deceptive advertising or, in some cases, prohibiting all advertising (Vander Linden et al., 2022).

Several industry organizations in the U.S. have proposed voluntary guidelines for responsible sports gambling advertising. The American Gaming Association (AGA) has published a Responsible Marketing Code for Sports Wagering which provides national guidelines for responsible advertising in the industry. This document, first published in 2019 and updated in 2023, aims to “set the industry standard for traditional and digital marketing and advertising of sports wagering where consumers are encouraged to place real money wagers” and compliance is overseen by an internal review board.<sup>8</sup> In April 2023, many of the leading professional sports leagues in the U.S. along with several major media outlets formed the Coalition for Responsible Sports Betting Advertising.<sup>9</sup> The Coalition “aims to implement and maintain consumer protection policies” built around several “core principles” and its creation followed closely on the heels of an effort earlier in 2023 to enact federal legislation to curb sports betting advertising nationally (Purdum, 2023).

### **Gambling Advertising in Massachusetts**

In considering the impact of advertising on gambling behavior in Massachusetts, it is helpful to examine the impact that the introduction of new forms of gambling may have had on awareness of and interest in these activities. Figure 1 shows trends in the number of searches in Massachusetts for gambling-related terms from 2015 to 2023 (from [Google Trends](#)). Numbers on the y-axis represent search interest relative to the highest point on the chart for the given region and time. A value of 100 is the peak popularity for the term. A value of 50 means that the term is half as popular.

Figure 1 shows a peak in searches for casino gambling in 2015 around the time that Plainridge Park Casino opened and two more peaks in 2018 and 2019 when MGM Springfield and Encore Boston Harbor opened. There was a small but noticeable increase in searches for sports betting following the advertising campaigns by DraftKings and FanDuel during 2015 NFL season. Interest in sports betting rose again in 2018 after PASPA was overturned and the major sports betting operators began advertising intensively to attract new customers and capture market share. This was followed by a spike in searches for sports betting in mid-2022 when this form of gambling was legalized and peaking in March 2023 when sports betting became operational in Massachusetts.

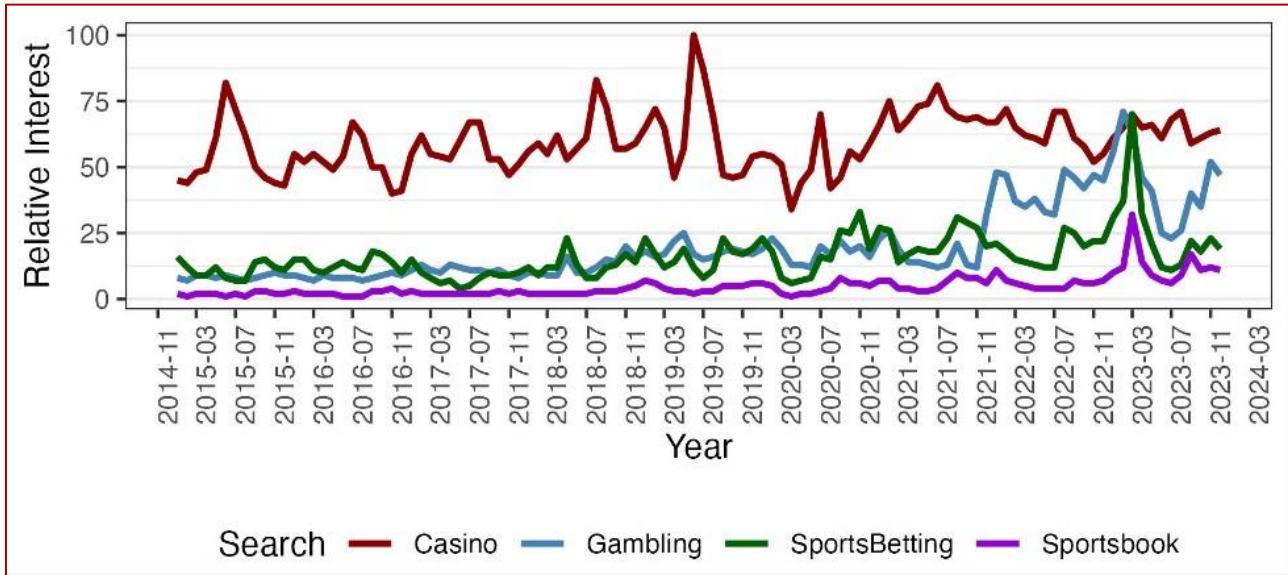
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<sup>7</sup> <https://www.americangaming.org/>

<sup>8</sup> <https://www.americangaming.org/responsible-marketing-code-for-sports-wagering/>;  
<https://cdcgaming.com/aga-activated-enforcement-of-the-responsible-marketing-code-for-sports-wagering/>

<sup>9</sup> [https://www.espn.com/chalk/story/\\_/id/36232587/sports-league-form-coalition-promote-limits-betting-ads](https://www.espn.com/chalk/story/_/id/36232587/sports-league-form-coalition-promote-limits-betting-ads)  
<https://pr.nba.com/coalition-for-responsible-sports-betting-advertising/>

Figure 1 Google trends for gambling searches in Massachusetts



The next section of the report presents a brief overview of the research literature on advertising of potentially addictive products followed by a review of research on the effects of gambling advertising internationally and then a presentation of survey results focused on sports betting and advertising in Massachusetts.



# Literature Review

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Within the broader processes of product marketing, advertising is ubiquitous as companies seek to win over consumers to gain market share against competitors. With the explosion of online activity, populations are exposed to more product advertising than ever before. With advances in artificial intelligence technology, advertisements target potential consumers with great precision by leveraging personal information gathered through online activity. This places a much greater obligation on governments to regulate advertising to protect consumers from potential harm.

While advertising is an important element of corporate marketing, there is controversy about the actual effectiveness of advertising on consumer behavior. A key question is how well advertising translates into increased sales and hence revenues. Two meta-analyses have explored the results of research on the effectiveness of advertising. The first covered a period from 1962 to 1981 while the second covered the period from 1960 to 2008 (Assmus et al., 2018). These studies suggest that there have been significant changes in the marketing environment that impact the effectiveness of marketing. These changes include (a) greater competition, (b) globalization, (c) the advent of the Internet, and (d) the ability of consumers to opt out of receiving advertisements. The 2018 study concluded that the impact of advertising on sales was small, particularly compared to the impact of price reductions. The authors noted that the impact of advertising was higher for durable goods compared to nondurable goods (such as gambling) and for products in earlier stages of the product life cycle (as is the case with sports betting).

Regulations around the advertising of addictive products are especially important to ensure the protection of vulnerable populations. Greater exposure to advertising of addictive products, such as alcohol and tobacco, has been shown to be associated with more positive attitudes toward these products, using these products earlier, and developing more problems associated with their use (Bouguettaya et al., 2020). Historically, this has been evident in legislative and regulatory responses to smoking and alcohol advertising. There is an extensive body of research on the impact of tobacco and alcohol advertising on behavior and harms associated with such advertising have been well documented in the literature.

## **Tobacco and Alcohol**

Extensive research evaluating exposure to smoking and alcohol advertising, including many systematic reviews, has been published, focusing on individuals at risk of problems and vulnerable populations, such as young people. In a review of primary studies on alcohol marketing and risk of alcohol problems, Murray et al. (2022) found a likely effect on alcohol-related emotions, cravings, and triggers for people in recovery. For young people, alcohol marketing has been shown to be associated with earlier initiation of drinking as well as increases in drinking intentions, overall alcohol consumption, and binge drinking (Nixon et al., 2022).

A systematic review of cross-sectional studies by Finan et al. (2020) suggested that a relationship exists between alcohol marketing exposure and alcohol use behaviors in young people. Systematic reviews of longitudinal studies on alcohol and tobacco found exposure to the marketing of these products was associated with the likelihood of earlier initiation of both drinking and smoking in young people (Anderson et al., 2009; Lovato et al., 2011).

Overall, several systematic reviews have found evidence of an association between exposure to alcohol and tobacco advertising and greater consumption leading to tobacco and alcohol-related harm (Anderson et al., 2009; Finan et al., 2020; Murray et al., 2022; Smith & Foxcroft, 2009). In response, heavier regulation of advertising has been suggested as a cost-effective intervention to reduce harms related to consumption of these goods (Casswell & Thamarangsi, 2009).

## Gambling

Gambling advertising promotes gambling as a harmless, normal, and fun leisure activity with the potential for economic gain (Clemens et al., 2017; McMullan et al., 2012; Monaghan et al., 2008; Parke et al., 2014; Planzer & Wardle, 2011). An early review by Binde (2007) outlined the challenges of measuring the impact of gambling advertising on individuals with gambling problems or those at risk of experiencing gambling problems. Challenges included differences in types of advertising, the maturity of different gambling markets, covariation between sales and advertising (i.e., companies tend to advertise more when sales are rising), the influence of non-advertising factors, and the attractiveness of alternate forms of entertainment. Binde (2007) concluded that there was little evidence that gambling advertising had substantial impacts except on the behavior of individuals experiencing gambling problems. In a more recent report to the Responsible Gambling Fund in Britain, Planzer and Wardle (2011) reviewed literature on various aspects of the impact of gambling advertising on gamblers and, like Binde, noted the challenges of measuring the impact of gambling advertising.

In 2014, the newly launched Responsible Gambling Trust (which replaced the Responsible Gambling Fund) commissioned another review of gambling advertising (Binde, 2014). This review focused on empirical studies that investigated the volume and efficiency of gambling advertising, gambling advertising impacts on individuals with gambling problems, and advertising messaging. With respect to the impact of gambling advertising on individuals with gambling problems, this review of cross-sectional studies identified an association between individuals observing gambling advertising and gambling participation; specifically, those who reported observing higher amounts of gambling advertising gambled more than average and/or had problems with gambling. Gamblers who were asked how they felt gambling advertising impacted their gambling behavior reported that advertising induced them to gamble more than they intended; this was especially true of people experiencing gambling problems.

Limited research has been conducted on the impacts of gambling advertising on subsequent gambling problems and harm. However, even the limited research focused on gambling and advertising has shown increasing harm associated with gambling advertising. McGrane et al. (2023) reviewed several studies published between 2000 and 2022 on the impacts of gambling-related advertising and identified a causal relationship between exposure to gambling marketing and positive attitudes toward gambling, greater intentions to gamble, and increased gambling activity overall. In fact, the authors suggested that a dose-response effect is likely – the greater the advertising exposure, the greater the risk of harm. In addition, they found a significant impact on young and vulnerable people, including those already at risk due to their current gambling behavior.

A meta-analysis of 24 studies on gambling and advertising conducted by Bouguettaya et al. (2020) found a positive association between exposure to gambling advertising and positive attitudes toward gambling, increased gambling intentions, and increases in gambling behavior, including frequency and expenditure, as well as encouraging new gamblers, consistent with research on alcohol and tobacco. A separate literature review funded by the Australian Responsible Gambling Fund, which advises the Government of New South Wales, included a review of studies on advertising and promotion of gambling (Rodda, 2020). This study similarly found an association between gambling advertising and gambling behaviors such as increased participation and expenditure. Furthermore, regular gamblers were found to have higher exposure to gambling advertising through promotions and inducements.

A recent rapid review of empirical research on gambling advertising found little effort to adequately display harm reduction or responsible gambling content within gambling advertising in three areas: content and narratives, delivery and placement, and structural features and mechanics (Torrance et al., 2021). Qualitative research into youth perceptions of gambling advertising found that it normalizes gambling and may encourage youth gambling behaviors. Additional studies of migrants who gamble found targeted advertising and promotional materials directed to certain ethnic groups (Wardle et al., 2019).

A survey of gamblers in Norway found a direct correlation between increased exposure to gambling advertising and increased problem gambling with Internet advertising having the strongest effect (Syvertsen et al., 2022). A systematic review of gambling advertising and adolescents and youth found that advertising normalized gambling as a leisure activity and increased positive attitudes toward gambling as well as participation (Labrador et al., 2021). Clemens et al. (2017) found that high gambling advertisement exposure was positively related to increases in gambling behavior, including problematic gambling behaviors, in adolescents and young adults in Germany.

## Sports Betting

Sports betting has been legal outside the U.S. for several decades; in Britain since the 1960s, for example, and in Australia since 1983. In 2014, the Australian Gambling Research Centre released a report that highlighted the role of sports betting advertising and its impacts on gambling behavior (Hing, 2014). This study concluded that sports betting advertising increased participation particularly of vulnerable populations such as youth and at-risk and problem gamblers and could impact gambling attitudes and behaviors.

Several studies on sports betting and advertising have been published by the International Gaming Research Unit at Nottingham Trent University in Britain with a particular focus on the impact of online sports betting advertising on individuals with or at risk of developing gambling problems. Lopez-Gonzalez et al. (2017) described the characteristics of online sports betting advertising whereby advertising companies encourage and maintain betting on sports by advertising specific games or players who have particularly strong followings, using well-known sports figures or celebrities to promote sports betting products,<sup>10</sup> and framing sports betting as a social activity. A follow-up content analysis of sports betting television advertisements in Britain and Spain identified specific themes within these advertisements such as men watching sports events while drinking and celebrating together (Lopez-Gonzalez et al., 2018). Those that depicted sports betting activities within the advertisement did so in ways that suggested minimal betting resulted in large payouts. A qualitative study of sports bettors in treatment for gambling problems demonstrated that they experienced increased impulsivity related to their gambling through offers of bonuses and enhanced odds (Lopez-Gonzalez et al., 2020).

With the recent explosion of sports betting across the U.S., gambling researchers have focused on investigating digital sports betting advertising as the primary means of exposure.<sup>11</sup> A systematic review of online gambling marketing strategies found sports to be a large target for digital gambling marketing (Guillou-Landreat et al., 2021). Of the 21 studies included in the review, 17 were from Australia and New Zealand with single studies from Britain, Canada, Spain, and the U.S. and 12 centered on sports betting advertising. Strategies employed in digital gambling advertising were advertising in digital apps, social media posts, and direct messaging to consumers. The messages of these advertisements implied an association between gambling and sports and were found to impart a feeling of positivity, excitement, and benefit by normalizing gambling as an everyday

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<sup>10</sup> For example, Cristiano Ronaldo, Neymar Jr., and Rafael Nadal for *PokerStars* and Shaquille O'Neal and Ben Affleck for *WynnBets*.

<sup>11</sup> In 2021, digital advertising accounted for 65% of the total advertising spending worldwide (Graham, 2021).

recreational activity. The authors concluded that targeted marketing strategies were highly focused on vulnerable populations such as young people and at-risk and problem gamblers.

The recent rapid increase in sports betting and online gambling and concerns about the potential public health impacts of gambling marketing have given rise to more recent studies on the impact of sports betting advertising on sports betting behavior. A systematic review by Killick and Griffiths (2021) found that sports betting marketing had a positive relationship with sports betting attitudes, intention, and behaviors with the strongest influence on those who scored higher on measures of problem gambling severity. Most of the 22 studies reviewed were conducted in Australia and used varying methodologies including longitudinal, cross-sectional, and mixed methods. Ten studies looked at sports betting advertising and attitudes towards sports betting. Findings suggested that advertising normalized sports betting by promoting sports betting as a harmless and potentially lucrative pastime. The constant inundation of sports betting advertisements, including incentives and language implying minimal risk to the gambler, contributed to a sense of normalcy. Intentions of participating in sports betting were reviewed in seven studies which found higher intentions to gamble among those exposed to sports betting advertising.

In summary, advertising has substantial impacts on attitudes toward and consumption of addictive products, including gambling. Advertising of these products generally emphasizes the positive experiences of using the product while downplaying the potentially negative aspects; further, the amount of advertising of such products far outstrips the amount of advertising about the risks of consumption or the availability of help for problems associated with consumption. The recent and rapid shift in advertising to digital channels and the evolution of highly targeted approaches to individual consumers raises further concerns about the potential negative effects of widespread gambling advertising. It is in this context that governments in several countries in Europe as well as Australia have recently instituted measures to limit the exposure of vulnerable sectors of the population, particularly youth, to sports betting and online gambling advertising.

# Advertising and Gambling Behavior in Massachusetts

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Turning from published research, the focus in this section is on the relationship between gambling advertising and gambling behavior in Massachusetts based on results from a series of online panel surveys that have been carried out in the Commonwealth as part of the SEIGMA study. While online panel surveys cannot be utilized to establish accurate gambling participation and problem gambling prevalence rates, they still hold considerable value as a means to identify **changes** in gambling-related attitudes, motivations, behaviors, and harms on a regular basis.

## Online Panel Surveys in Massachusetts, 2014-2023

The advantages of online panel surveys are that: (a) the validity of answers to ‘sensitive questions’ (e.g., gambling) tends to be higher in self-administered formats (Tourangeau & Smith, 1996; van der Heijden, Van Gils, Bouts, & Hox, 2000), (b) everyone has agreed and expects to be contacted, (c) the results can be obtained in a much shorter period of time, and (d) they are much less expensive than general population surveys (Olson et al., 2021). The main limitation of online panels is that panelists are not randomly selected but rather self-enrolled. While online panel companies generally stratify samples to be demographically representative of the population, significant behavioral biases typically remain that are not corrected by this stratification or by demographic weighting (e.g., Pickering & Blasczynski, 2021; Lee, Back et al., 2015). However, these behavioral biases can be an advantage in studies where these biases can be utilized to obtain a higher ‘yield’ of people with gambling problems (as heavy gambling involvement is one of these reliable behavioral biases) (Williams et al., 2023).

Three online panel surveys have been carried out in Massachusetts as part of the SEIGMA study. The Baseline Online Panel Survey (BOPS) was fielded in 2014 simultaneously with a baseline general population survey. The Follow-up Online Panel Survey (FOPS) was fielded in 2022 simultaneously with a follow-up general population survey. The third Online Panel Survey (OPS23) was fielded one year later in 2023.<sup>12</sup> The original reason for utilizing online panels in the SEIGMA study was to obtain information from a large number of people with gambling problems so that the demographic and behavioral patterns of this important subgroup in the population could be better understood. As noted above, the results of the online panel surveys cannot be generalized to the population but are useful in monitoring changes in gambling attitudes, behavior and harms over time.

## BOPS Recruitment and Sample

Ipsos Public Affairs (Ipsos) conducted the SEIGMA Baseline Online Panel Survey (BOPS). Ipsos maintains an online panel of individuals across the country who have agreed to participate in research studies. When respondents join the Ipsos panel, they provide demographic information about themselves and their household (e.g., age, gender, state of residence, county of residence). Ipsos used this information to email a sample of Massachusetts adults stratified by age, gender and region (Western versus Eastern Massachusetts) that was proportional to the number of people in these groups as reported by the U.S. Census. To obtain a final sample, Ipsos supplemented their own online panel sample with Massachusetts online panel members from seven

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<sup>12</sup> A fourth online panel survey (OPS24) was fielded in March 2024.

partner vendors. The BOPS was launched in late October 2013, and data collection ended in late March 2014 to run coincident with data collection for the Baseline General Population Survey. A sample of 5,046 completed surveys was obtained. A full description of the methodology utilized for the BOPS was published in a separate SEIGMA report (Williams et al., 2017).

### FOPS and OPS23 Recruitment and Sample

Qualtrics conducted the SEIGMA Follow-up Online Panel Survey (FOPS) and the 2023 Online Panel Survey (OPS23). Like Ipsos, Qualtrics maintains an online panel of individuals who have agreed to participate in research studies in return for small incentives and have provided demographic information about themselves. This information was used to recruit a sample of Massachusetts residents aged 18 and over with quotas established for age and gender. The FOPS was fielded in March 2022 and OPS23 was fielded in March 2023. A sample of 3,041 completed surveys was obtained for the FOPS and a sample of 3,380 was obtained for OPS23. It is worth noting that the IP addresses of 5% (n=165) of the OPS23 respondents had also been used in the 2022 survey.<sup>13</sup> Given the limited overlap, we chose not to drop these respondents from our analyses.

In addition to obtaining the 2014 sample from a different vendor than the 2022 and 2023 surveys, the question wording specific to sports betting in the latter two surveys was slightly different so as to accommodate the newer forms of sports betting available in 2022 compared to 2014. In the BOPS, the question about sports betting asked “In the past 12 months, how often have you bet money on sporting events (this includes sports pools)” whereas the FOPS and OPS23 asked “In the past 12 months, how often have you bet money or gambled on sports (this includes social betting, online betting, fantasy sports, and esports).”

### Comparing the Online Panel Surveys with the General Population Surveys

To provide context, it is helpful to compare gambling participation and problem gambling prevalence in the general population and in the online panels. Given their contemporaneous fielding, this comparison is possible for the Baseline and Follow-up surveys. Further detail is provided in a separate SEIGMA report comparing the results of the three online panel surveys more comprehensively (Volberg et al., 2024). Briefly, participation in most types of gambling among online panelists in 2014 was statistically significantly higher than for all adults in Massachusetts in 2013. The one exception was *sports betting* which, like casinos, was illegal in Massachusetts at the time but still measurably prevalent. In 2013, 12.6% of all Massachusetts adults (weighted to the population) had gambled on sports in the past year compared to 13.4% of online panelists (unweighted) which was not a statistically significant difference.

As noted in our report on the 2021 general population survey, there were substantial decreases in overall gambling participation as well as participation in specific types of gambling in Massachusetts between 2014 and 2021, at least partly due to the lingering impacts of the COVID-19 pandemic (Volberg et al., 2023). Comparing the 2014 and 2022 online panel surveys, there was no change in overall gambling participation. However, participation in traditional lottery and instant games was down along with participation in raffles and casino gambling. In contrast, participation in daily lottery games, sports betting,<sup>14</sup> private wagering, horse race betting, bingo and online gambling was higher among online panelists in 2022 compared to 2014. With the exception of daily lottery games and bingo, all of these types of gambling can be done without going out in public.

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<sup>13</sup> In response to a query, Qualtrics specified that IP addresses are the only method used to determine whether panelists in separate surveys are the same individuals. While it is possible that some panelists may have used different devices or devices in different geographic locations in the two surveys and thus would not be identified as ‘overlap’ cases, Qualtrics is unable to provide any additional information regarding the extent of overlap between the two surveys.

<sup>14</sup> As a reminder, the question about sports betting participation was changed in the 2021 general population survey (for half of the respondents) and in the 2022 online panel survey to accommodate the newer forms of sports betting available to Massachusetts adults.

In addition to gambling participation, it is helpful to understand differences between the general population surveys (weighted) and online panel surveys (unweighted) in the prevalence of gambling problems. As noted in our report on the 2021 general population survey, there was no change in the prevalence of at-risk or problem gambling among Massachusetts adults between 2013 and 2021. The proportion of the adult population classified as non-gamblers was higher in 2021 (38.7%) compared to 2013 (26.6%) and the proportion classified as recreational gamblers was lower (51.3% versus 62.9%).

In contrast to the general population, there were changes in the proportion of online panelists classified as problem gamblers in 2022 compared to 2014. Comparing the baseline and follow-up online panel surveys, the proportion of panelists classified as non-gamblers was unchanged while the proportion classified as recreational gamblers was lower in 2022 than in 2014. The proportion of online panelists classified as problem gamblers in 2022 (11.2%) was higher than the proportion classified in this way in 2014 (6.4%).

### **Sports Betting Behavior in the Massachusetts Online Panels**

Given that sports betting is the type of gambling most closely associated with increases in gambling advertising, it is helpful to consider changes in sports betting behavior among the Massachusetts online panelists in detail. To understand changes in sports betting behavior, we examined the results of all three of the online panel surveys carried out in Massachusetts. While there was a decline in past year sports betting between 2013 and 2021 in the general population, from 12.6% to 9.9% (Volberg et al., 2023), the proportion of online panelists that had bet on sports in the past year was substantially higher than in the population and there was an increase in participation rather than a decline over time. Table 1 presents information about sports betting participation in the 2014, 2022 and 2023 online panel surveys.

Table 1 shows that in 2014, 13.4% of the online panelists had gambled on sports in the past year with just over half of the sports bettors (51%) having done so at least monthly or weekly. In 2022, nearly twice as many online panelists had gambled on sports in the past year (23.8%) with nearly three-quarters (71%) having done so at least monthly or weekly. In 2023, the proportion of online panelists who had gambled on sports in the past year increased again, to 33.8% with 80% having done so at least monthly or weekly.<sup>15</sup>

Differences between the 2014 and the 2022 surveys in not having bet on sports in the past year and betting weekly on sports in the past year were statistically significant with small effect sizes (-0.27 to 0.27). Only the difference between the 2022 and 2023 surveys in not having bet on sports in the past year was statistically significant with a small effect size (-0.22). Finally, all of the differences between the 2014 and 2023 surveys except 'at least yearly' participation were statistically significant albeit with small effect sizes (-0.49 to 0.45).

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<sup>15</sup> Past year participation in most types of gambling increased significantly between the 2022 and 2023 online panel surveys. It is likely that gambling behavior in the 2022 survey was suppressed due to lingering effects of COVID restrictions. It is also important to note that panelists were reporting on their past 12 months of behavior (March 2021 to March 2022) which included a period when some COVID restrictions were still in place. It was not until May 2021 that all COVID-19 restrictions were removed for all gambling establishments in Massachusetts.

**Table 1 Past-year sports betting frequency and activities (unweighted)**

		BOPS 2014		FOPS 2022		OPS23 2023	
		% <sup>3</sup>	95% CI <sup>3</sup>	% <sup>3</sup>	95% CI <sup>3</sup>	% <sup>3</sup>	95% CI <sup>3</sup>
Frequency of sports betting	1=never	86.6	(85.6, 87.5)	76.2	(74.7, 77.7)	66.2	(64.6, 67.8)
	2=at least yearly	6.5	( 5.8, 7.2)	6.8	( 5.9, 7.7)	6.9	( 6.1, 7.8)
	3=at least monthly	3.4	( 3.0, 4.0)	6.9	( 6.0, 7.8)	10.9	( 9.9, 11.9)
	4=at least weekly	3.5	( 3.0, 4.0)	10.1	( 9.1, 11.3)	16.1	(14.9, 17.3)
Type of sports betting engaged in	Professional sporting events			59.3	(55.7, 62.9)	62.9	(60.0, 65.6)
	Sports parleys			35.8	(32.4, 39.4)	47.7	(44.9, 50.6)
	Fantasy sports betting			32.4	(29.1, 35.9)	34.0	(31.3, 36.8)
	Betting on sports you participated in			11.2	( 8.5, 14.6)	12.3	(10.6, 14.4)
Where and how bet on sports	Office sports polls or social betting against friends/family			12.2	(11.1, 13.4)	34.9	(32.1, 37.7)
	Legal land-based sportsbook outside MA			6.3	( 5.5, 7.2)	30.0	(27.4, 32.8)
	Legal land-based sportsbook in MA			5.0	( 4.3, 5.8)	39.3	(36.5, 42.2)
	Illegal/underground land based sportbook or bookmaker in MA			3.7	( 3.1, 4.5)	18.0	(15.9, 20.4)
	Sporting event with online sportsbook outside MA			4.9	( 4.2, 5.7)	15.8	(13.8, 18.0)
	Sporting event with online sportsbook in MA			2.7	( 2.2, 3.4)	26.3	(23.8, 28.9)

<sup>3</sup> Percentages and 95% CI are calculated using the unweighted N



As already noted, participants in the 2022 and 2023 surveys were asked about their sports betting behavior in greater detail than in 2014. In both 2022 and 2023, respondents who had bet on sports in the past year were most likely to have bet on professional sports events followed by sports parleys<sup>16</sup> and fantasy sports. Betting on sports that a person had participated in themselves was far less common. In 2022, most sports betting was done in office pools or in social betting against friends and/or family. Notably, 5.0% of past-year sports bettors in 2022 had bet with online sportsbooks outside of Massachusetts. In 2023, participation rates were higher for all types of sports betting outlets.

Differences between the 2022 and 2023 surveys in the types of sports betting engaged in were not statistically significant with the exception of sports parleys (0.24 effect size). Differences in sports betting modality were all statistically significant with effect sizes that ranged from small to large (0.49 to 0.91).

### Advertising and Gambling in OPS23

With sports betting becoming operational in Massachusetts in 2023, several questions were included in the 2023 online panel survey to assess the relationship between exposure to advertising and past year gambling behavior. The first question asked how much gambling advertising panelists recalled having seen in the past year. The second question asked about exposure to news stories about gambling in various media (TV, radio, social media, and online). The third question inquired whether advertising or news stories had any impact on past year gambling behavior. The final question was limited to panelists who indicated that exposure to advertising or news coverage had led them to gamble more and asked what specifically had caused this increase. Panelists who indicated that exposure had led them to gamble less were not asked for specific reasons.

Table 2 presents information about exposure to advertising among all of the 2023 panelists. Nearly one-third (30.8%) of panelists recalled seeing “a lot” of **gambling advertising** in the past year while 14.9% recalled seeing “a lot” of **news stories** about gambling in the media in the past year. The majority of panelists (77.8%) did not believe that advertising or news stories had any impact on their gambling while 15.1% of panelists felt that gambling advertising or news stories had caused them to gamble less and 7.1% felt that gambling advertising or news stories had caused them to gamble more.

Among the online panelists in 2023 who felt that advertising or news stories had caused them to gamble more, the majority (64.3%) believed that general promotional advertising had been the cause. Another 26.6% identified targeted promotional advertising as the cause of their greater gambling involvement and a similar proportion (28.6%) identified the cause as general news stories about casinos or gambling. It is interesting that one-third of the respondents who felt that advertising or news stories had led them to gamble more (32.0%) identified “general promotional advertising from the New England Casino Association,” a non-existent entity that was included in the survey to assess the extent of response bias related to this issue.<sup>17</sup>

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<sup>16</sup> Sports parleys are combinations of multiple wagers into a single bet in which every wager must win for the bet to pay out. Parleys are riskier than individual bets but have higher potential payouts.

<sup>17</sup> **Response bias** refers to factors that can lead survey respondents to provide inaccurate answers to survey questions. In the present case, it is possible that panelists reported that advertising by a non-existent organization led them to increase their gambling because they believed that this was what the researchers wanted them to say. Another possibility is that the panelists were not paying careful attention as they completed the survey.

**Table 2 Gambling advertising impacts (OPS23, unweighted)**

		Unweighted N <sup>1</sup>	Percent	95% CI
<b>How much gambling advertising seen in the past year (TV, radio, online, through social media, billboards, in the mail)</b>	Total	3380	100	
	A lot	1041	30.8	(29.3, 32.4)
	A fair amount	944	27.9	(26.4, 29.5)
	Some	712	21.1	(19.7, 22.5)
	Very little	406	12.0	(11.0, 13.2)
	None	277	8.2	(7.3, 9.2)
<b>How many news stories about gambling seen in past year in the media (TV, radio, social media, online)</b>	Total	3380	100	
	A lot	505	14.9	(13.8, 16.2)
	A fair amount	825	24.4	(23.0, 25.9)
	Some	911	27.0	(25.5, 28.5)
	Very little	674	19.9	(18.6, 21.3)
	None	465	13.8	(12.6, 15.0)
<b>Has gambling advertising and/or news stories about gambling had any impact on your gambling behavior in past 12 months</b>	Total	3380	100	
	It has had no impact on my gambling	2630	77.8	(76.4, 79.2)
	It has caused me to gamble less	509	15.1	(13.9, 16.3)
	It has caused me to gamble more	241	7.1	(6.3, 8.0)
<b>Caused you to gamble more<sup>2</sup></b>	General news stories about casinos or gambling	69	28.6	(23.3, 34.7)
	General promotional advertising from the casino, lottery, or other gambling provider (billboards, TV/radio advertisements)	155	64.3	(58.1, 70.1)
	General promotional advertising from the New England Casino Association	77	32.0	(26.4, 38.1)
	Targeted promotion toward me (in my mail or email)	64	26.6	(21.4, 32.5)

<sup>1</sup> Unweighted N refers to the total number of respondents who answered this question

<sup>2</sup> Panelists could check more than one response to this question

Finally, Table 3 presents information about differences in the impact of advertising on gambling behavior based on gambler group. This table shows that there were significant differences in the proportion of each group (Non-Gamblers, Recreational Gamblers, At-risk Gamblers, Problem/Pathological Gamblers) who felt that they had seen “a lot” or “a fair amount” of gambling advertising in the past year. Not surprisingly, only about half of Non-Gamblers (51.0%) recalled this much gambling advertising compared to 60.9% of Recreational Gamblers, 58.0% of At-risk Gamblers, and 61.2% of Problem/Pathological Gamblers. Similarly, one-quarter of Non-Gamblers (26.4%) recalled “a lot” or “a fair amount” of news stories about gambling in the past year compared to 38.1% of Recreational Gamblers, 45.5% of At-risk Gamblers, and 53.7% of Problem/Pathological Gamblers. These results may be due to a ***self-relevance effect*** which is when memory performance is improved for information that is considered to be self-relevant.

When asked what impact gambling advertising or news stories had on their gambling behavior in the past year, 93.1% of Non-Gamblers indicated that there was no impact on their gambling while 5.2% indicated that they gambled less as a result of such exposure. In contrast, a small proportion of Recreational Gamblers (3.6%) indicated that exposure to gambling advertising or news stories caused them to gamble more and much larger proportions of At-risk Gamblers (13.7%) and Problem/Pathological Gamblers (20.0%) felt that such exposure had caused them to gamble more.

In summary, the online panel surveys in Massachusetts included much larger numbers of gamblers, including gamblers at risk of and experiencing problems, compared with general population surveys conducted contemporaneously. While past year sports betting participation declined in the general population between 2013 and 2021, past year sports betting among the online panelists increased from 2014 to 2022 and rose again in 2023. It is also notable that the proportion of past year sports bettors in the online panels who participated at least monthly or weekly also increased, from 51% in 2014 to 71% in 2022 and to 80% in 2023. With respect to the impacts of gambling advertising, only a small proportion of online panelists in Massachusetts in 2023 (7.1%) felt that such advertising or news coverage had caused them to gamble more. It is notable, however, that online panelists at risk of or experiencing gambling problems were more likely to recall substantial amounts of advertising and news coverage and more likely to believe that this exposure had led them to gamble more.

**Table 3 Gambling Advertising by Gambler Group (OPS23, unweighted)**

		Non gambler			Recreational gambler		At-risk gambler		Problem gambler		
		Unweighted N	%	95% CI	%	95% CI	%	95% CI	%	95% CI	p-value
<b>Unweighted N</b>			611		1782		497		490		
<b>How much gambling advertising seen in the past year (TV, radio, online, through social media, billboards, in the mail)</b>	A lot	1,041	29.1	(25.7, 32.9)	34.1	(32.0, 36.4)	26.8	(23.1, 30.8)	24.9	(21.3, 28.9)	<0.0001
	A fair amount	944	21.9	(18.8, 25.4)	26.8	(24.8, 28.9)	31.2	(27.3, 35.4)	36.3	(32.2, 40.7)	
	Some	712	18.8	(15.9, 22.1)	18.5	(16.7, 20.3)	29.6	(25.7, 33.7)	24.7	(21.1, 28.7)	
	Very little	406	13.7	(11.2, 16.7)	12.2	(10.8, 13.8)	9.1	(6.8, 11.9)	12.0	(9.4, 15.2)	
	None	277	16.4	(13.6, 19.5)	8.4	(7.2, 9.8)	3.4	(2.1, 5.4)	NSF		
<b>How many news stories about gambling seen in past year in the media (TV, radio, social media, online)</b>	A lot	505	10.5	(8.3, 13.2)	14.3	(12.8, 16.0)	13.5	(10.8, 16.8)	24.3	(20.7, 28.3)	<0.0001
	A fair amount	825	15.9	(13.2, 19.0)	23.8	(21.9, 25.9)	32.0	(28.0, 36.2)	29.4	(25.5, 33.6)	
	Some	911	26.2	(22.9, 29.8)	25.3	(23.3, 27.3)	32.2	(28.2, 36.4)	28.8	(24.9, 32.9)	
	Very little	674	22.9	(19.8, 26.4)	22.1	(20.2, 24.1)	13.5	(10.7, 16.8)	14.9	(12.0, 18.3)	
	None	465	24.5	(21.3, 28.1)	14.5	(12.9, 16.2)	8.9	(6.7, 11.7)	2.7	(1.5, 4.5)	
<b>Has gambling advertising and/or news stories about gambling had any impact on your gambling behavior in past 12 months</b>	It has had no impact on my gambling	2,630	93.1	(90.8, 94.9)	87.8	(86.2, 89.2)	62.6	(58.2, 66.7)	38.0	(33.8, 42.3)	<0.0001
	It has caused me to gamble less	509	5.2	(3.7, 7.3)	8.6	(7.4, 10.0)	23.7	(20.2, 27.7)	42.0	(37.8, 46.4)	
	It has caused me to gamble more	241	NSF		3.6	(2.9, 4.6)	13.7	(10.9, 17.0)	20.0	(16.7, 23.8)	
<b>Caused you to gamble more</b>	General news stories about casinos or gambling	69	NSF		20.0	(12.0, 31.5)	29.4	(19.8, 41.2)	34.7	(26.0, 44.6)	0.1841
	General promotional advertising from the casino, lottery, or other gambling provider	155	0.0	NA	61.5	(49.3, 72.5)	69.1	(57.2, 78.9)	69.4	(59.6, 77.7)	0.0076
	General promotional advertising from the New England Casino Association	77	NSF		21.5	(13.2, 33.2)	39.7	(28.8, 51.7)	34.7	(26.0, 44.6)	0.0848
	Targeted promotion toward me (in my mail or email)	64	60.0	(29.7, 84.2)	35.4	(24.8, 47.7)	23.5	(14.9, 35.0)	19.4	(12.7, 28.4)	0.0375

# Discussion

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In this section of the report, we summarize evidence related to the relationship between advertising and gambling behavior in the scholarly literature and from research carried out in Massachusetts. We identify several concerns and propose recommendations for strengthening current approaches to regulating gambling advertising in Massachusetts. We conclude with consideration of a possible new direction in monitoring the impacts of gambling advertising in the Commonwealth in the interests of minimizing and mitigating gambling harms in the future.

## Outcomes Identified to Date

As noted previously, advertising has substantial impacts on attitudes toward and consumption of addictive products, including gambling. Advertising of these products generally emphasizes the positive experiences of using the product while downplaying the potentially negative aspects; further, the amount of advertising of such products far outstrips the amount of advertising about the risks of consumption or the availability of help for problems associated with consumption. The recent and rapid shift in advertising to digital channels and the evolution of highly targeted approaches to individual consumers raises further concerns about the potential negative effects of widespread gambling advertising. It is in this context that governments in several European countries as well as Australia have recently instituted measures to limit the exposure of vulnerable sectors of the population, particularly youth, to sports betting and online gambling advertising. Existing research evidence suggests that exposure to gambling advertising is associated with more positive gambling-related attitudes, greater gambling intentions, and increases in gambling and problem gambling behavior. Prior investigations on reducing harms associated with alcohol and tobacco have found that restrictions on advertising, along with availability and pricing, are one of the most cost-effective measures for reducing population-level harms related to consumption of these products (Babor et al., 2010; Blecher, 2008).

With respect to Massachusetts specifically, the online panel surveys included much larger numbers of gamblers, including gamblers at risk of and experiencing problems, compared with general population surveys conducted contemporaneously. This feature of the online panels provided more granular information about the potential impacts of gambling advertising on gambling behavior than would have been possible based solely on the population surveys.

While past year sports betting participation declined in the adult population of Massachusetts between 2013 and 2021, past year sports betting among the online panelists increased from 2014 to 2022 and rose again in 2023. It is also notable that the proportion of past year sports bettors in the online panels who participated at least monthly or weekly increased, from 51% in 2014 to 71% in 2022 and to 80% in 2023. While only a small proportion of online panelists in Massachusetts in 2023 (7.1%) felt that gambling advertising or news coverage caused them to gamble more, online panelists at risk of or experiencing gambling problems were more likely than recreational gamblers to recall substantial amounts of advertising and news coverage and more likely to believe that this exposure led them to gamble more. These results align with the broader research literature and can help inform policy and regulatory approaches under consideration in the Commonwealth.

## Issues of Concern

An important issue related to gambling and advertising concerns vulnerable groups in the population. While many jurisdictions have addressed concerns about exposure of underage individuals to gambling advertising,

few have addressed the vulnerability of individuals in recovery from gambling problems and their susceptibility to relapse in response to gambling advertising or news coverage.

Data from the Massachusetts Gambling Impact Cohort (MAGIC) study, a longitudinal study of a group of Massachusetts adults carried out between 2013 and 2019 provides insight into this issue (MAGIC Research Team, 2021). This study included five assessments of a cohort of 3,139 Massachusetts residents stratified by risky gambling behavior. There was an increase in problem gambling prevalence within the cohort in 2018 (Wave 4) and 2019 (Wave 5) relative to Wave 1 in 2013, driven primarily by an increased rate of relapse among remitted individuals. Because the increase occurred prior to the opening of each of the two Massachusetts casinos, the research team concluded that the higher relapse rate was due to the heightened publicity and media attention concerning casinos and gambling prior to the actual opening of the casinos (MAGIC Research Team, 2021). A key recommendation in the final MAGIC report was to limit sports betting advertising when this type of gambling was introduced in Massachusetts to mitigate harms associated with high rates of relapse.

Another issue related to gambling and advertising is the dearth of population-level approaches to minimizing and mitigating gambling harms. While the concept of gambling as a public health issue has a long history (Korn & Shaffer, 1999; Volberg, 1994), a recent global review of trends in countries that introduced major legislative changes related to gambling between 2018 and 2021 found that while more than 80% of countries worldwide now legally permit gambling, measures to prevent gambling harms are almost exclusively focused on individual responsibility (i.e., responsible gambling). Exceptions to individual framing of gambling harms include restricting the availability of gambling, restricting market-related activities such as gambling advertising and establishing a focus on operators' duty of care<sup>18</sup> to gamblers (Ukhova et al., 2024). These authors note, however, that the effectiveness of system framing (as opposed to individual framing) depends on how such measures are implemented and requires careful evaluation and monitoring.

## Recommendations

A recent review of restrictions placed on gambling advertising and inducements identified similarities and differences across 10 international jurisdictions (Stark & McKnight, 2024). The most common approaches related to advertising were prohibitions on advertising that appealed to youth, targeted people experiencing gambling harm, was misleading, or suggested that gambling could be a solution to problems or contribute to success. Emerging advertising requirements related to gambling included restrictions on advertising higher-risk games, limits on advertising volume, and advertising focused on a specific purpose (e.g., portraying gambling as a form of entertainment, encouraging support of charitable causes). With regard to inducements, the most common approaches internationally were requiring that inducements provide information on terms and conditions, not create a sense of urgency, be below a specific maximum value, and be restricted to customers opening an account. Emerging inducement requirements included not offering incentives to individuals displaying gambling harm and restrictions on incentives to win patrons back from other gambling operators.

The MGC report on advertising and gambling made specific recommendations to strengthen current gambling advertising regulations in Massachusetts (Vander Linden et al., 2022). These included:

- Strengthening protections of underage populations;
- Restricting advertising campaigns that target vulnerable groups;
- Requiring inclusion of messages about where to obtain help in all advertising and marketing materials;
- Limiting the intensity and frequency of advertising;

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<sup>18</sup> **Duty of care** is a legal concept which places an obligation on commercial actors to not harm their customers. Duty of care is related to but not synonymous with **consumer protection**, which refers to measures to prevent businesses from using unfair, deceptive or fraudulent practices.

- Ensuring that restrictions include digital media and third parties;
- Prohibiting false or misleading advertising; and
- Restricting communications about inducements, bonuses and credits.

We strongly concur with all of the recommendations in the MGC’s White Paper and, based on the recent international review, have several additional recommendations to propose for the MGC’s consideration:

- Limiting advertising of higher-risk games;
- Limiting advertising focused on specific purposes (e.g., gambling as entertainment, gambling to support good causes);
- Requiring that inducements not create a sense of urgency, be limited in value, and be offered only when customers are opening an account;
- Restricting celebrity endorsements as these:
  - Tend to promote subsequent gambling involvement by young people;
  - Precipitate relapse in recovered addicts; and
  - Counteract the effectiveness of public health messages advocating limited use.

### Monitoring and Surveillance

Earlier in this report, we presented data on trends in numbers of Google online searches in relation to the introduction of new gambling opportunities in Massachusetts. While informative, our approach could be greatly improved using methods such as those developed by the [NORC Social Data Collaboratory](#). In a brief concept paper provided to the SEIGMA research team, the Social Data Collaboratory (SDC) noted that, beyond conventional advertising, social media platforms such as Facebook and Instagram play a significant role in promoting sports betting and other gambling-related content. The SDC provided the following graphs showing results of a cursory search of these platforms between September 2022 and September 2023 that show many hundreds of posts and thousands of interactions with posts about sports betting from Massachusetts-based accounts.

**Figure 2 Posts and interactions about gambling on Facebook and Instagram**



The SDC noted that it is challenging to accurately measure numbers of social media marketing messages because, unlike traditional advertising, social media marketing incorporates multifaceted strategies, including influencer marketing and viral tactics, which encourage users to amplify marketing messages by sharing them in their own social networks. With extensive expertise in measuring traditional advertising on social media as well as detecting influencer and viral marketing techniques, the SDC could provide valuable data and analysis of these activities and their impact on gambling attitudes and behavior in Massachusetts going forward.

Understanding how gambling content on social media is utilized and distributed would enhance the MGC’s ability to monitor the impacts of the introduction of sports betting in Massachusetts over time. We recommend that consideration be given to engaging with the SDC, or a similar entity, to obtain information about trends, tactics and engagement with gambling-related advertising, marketing and influencer promotion strategies,

measure the potential reach of gambling-related posts on social media platforms, and assess the prevalence and effectiveness of gambling prevention and treatment messages within the social media landscape.

Gambling advertising has rapidly evolved far beyond the conventional formats of broadcast television and radio to encompass platforms and actors with much broader as well as more targeted reach. Online marketing, particularly in relation to gambling, is not well researched although evidence from recent journalistic investigations suggests that there are few, if any, guardrails in place (Betts et al., 2022; Lipton & Vogel, 2022; Ruiz et al., 2022; Sayre, 2024). While national legislation may be out of reach, there are steps that can be taken in Massachusetts to establish protections to prevent and moderate gambling harms in the Commonwealth related to the recent introduction of casinos and sports betting.



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# Impacts of Advertising on Gambling Behavior in Massachusetts

Rachel Volberg, PhD

Alberta Gambling Research Institute 23<sup>rd</sup> Annual Conference

*April 13, 2024*

# Disclosure of Potential Conflict of Interest

- The SEIGMA study is funded by the Massachusetts Gaming Commission (MGC) and based at the University of Massachusetts Amherst.
- I also run a private consulting company, Gemini Research, that specializes in gambling research.
- I have had no affiliation with the gambling industry in the past 10 years.
- In the past 10 years, I have received research funding from government agencies in Connecticut, Massachusetts, New Jersey, Oregon, and Washington State as well as Australia, Britain, Canada, New Zealand, and Sweden.
- I have received honoraria and reimbursement for travel costs to present at conferences.

# Overview of Presentation

- Background
  - Recent developments in gambling advertising
- Methods
  - Literature review (tobacco, alcohol, gambling)
- Advertising & gambling behavior in MA
  - Online panel data
  - Specific advertising questions
- Discussion & recommendations

# Background

- Advertising has undergone profound changes since the advent of the Internet in 1990s
- Emergence of many forms of online marketing
  - Paid placements
  - Influencer marketing
  - Shareable social media content
- Spending on sports betting advertising
  - TV (\$21.4 million in 2019; \$314.6 million in 2022)
  - Online gambling (\$1 billion in 2021; \$1.9 billion in 2023)



# Sports Betting Advertising

- As of May 2024, 38 states and DC offered sports betting
- Advertising restrictions
  - Ads must feature toll-free helpline number across different media
  - No targeting of underage, self-excluded
  - Otherwise, few restrictions (e.g., volume or placement)
- Voluntary industry guidelines proposed
  - American Gaming Association
  - Coalition for Responsible Sports Betting Advertising

# Study Methods

- Review of extensive literature on impacts of advertising on behavior
  - Focus on tobacco, alcohol
  - Research on gambling and advertising included
- Primary data from SEIGMA
  - Online panel surveys (2014, 2022, 2023)
  - Not representative of population but useful in understanding changes over time

# Online Panel Surveys

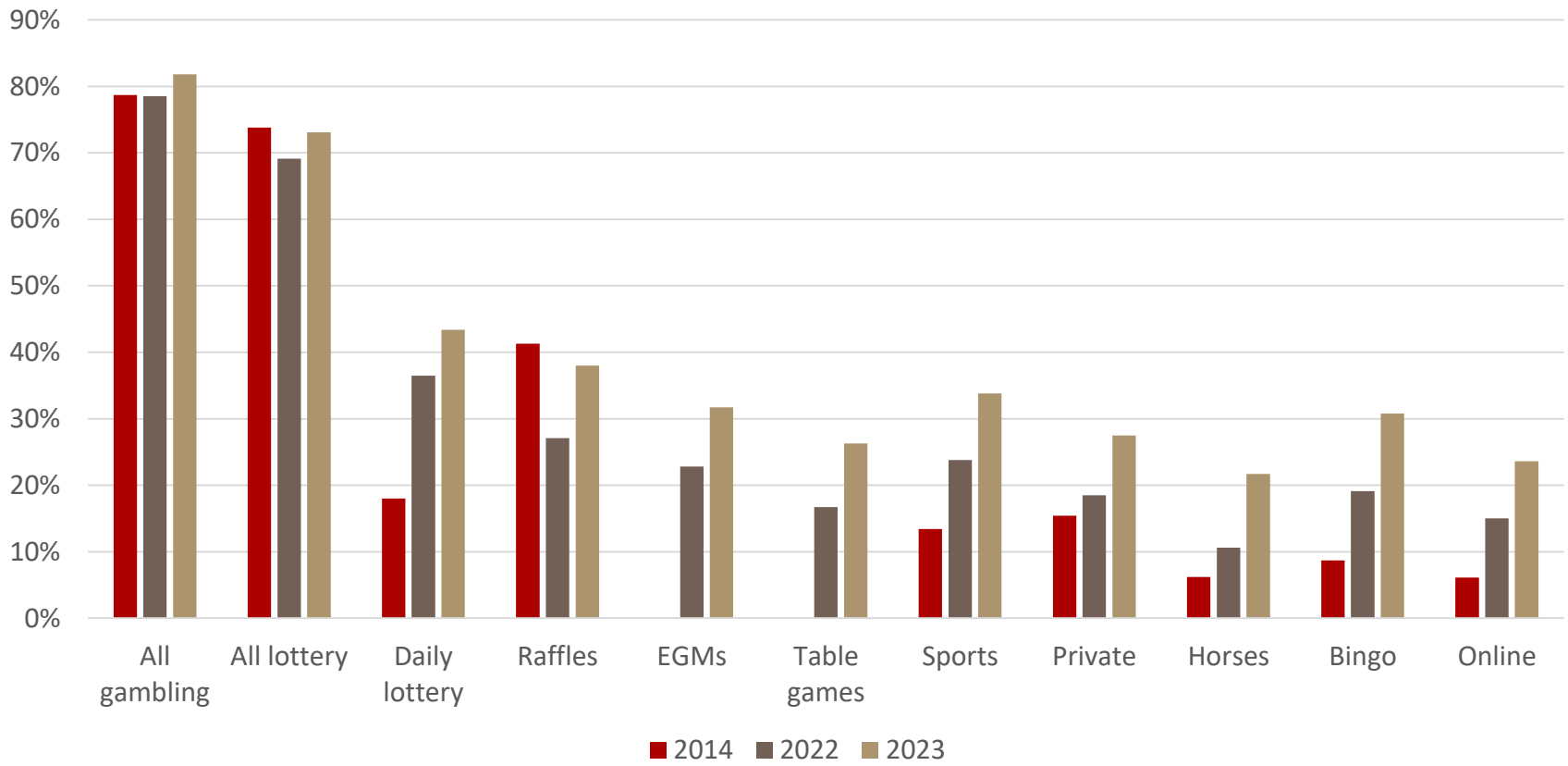
- Significant behavioral biases can be an advantage
  - Heavy gambling involvement is a reliable behavioral bias of online panel members
  - Able to obtain higher proportion of people experiencing gambling problems
- Online Panels Surveys in Massachusetts
  - 2014 (BOPS): Ipsos (n=5,046), over-sampled Western MA
  - 2022 (FOPS): Qualtrics (n=3,041)
  - 2023 (OPS23): Qualtrics (n=3,380)
    - Question about sports betting changed in 2022 to include fantasy sports, esports

# Results: Literature Review

- Advertising has substantial impacts on attitudes and consumption of addictive products
- Generally emphasizes positive experiences of use, downplays potentially negative aspects
- Amount of positive advertising swamps advertising on risks or availability of help
- Rapid shift to digital channels, evolution of highly targeted approaches raises further concerns

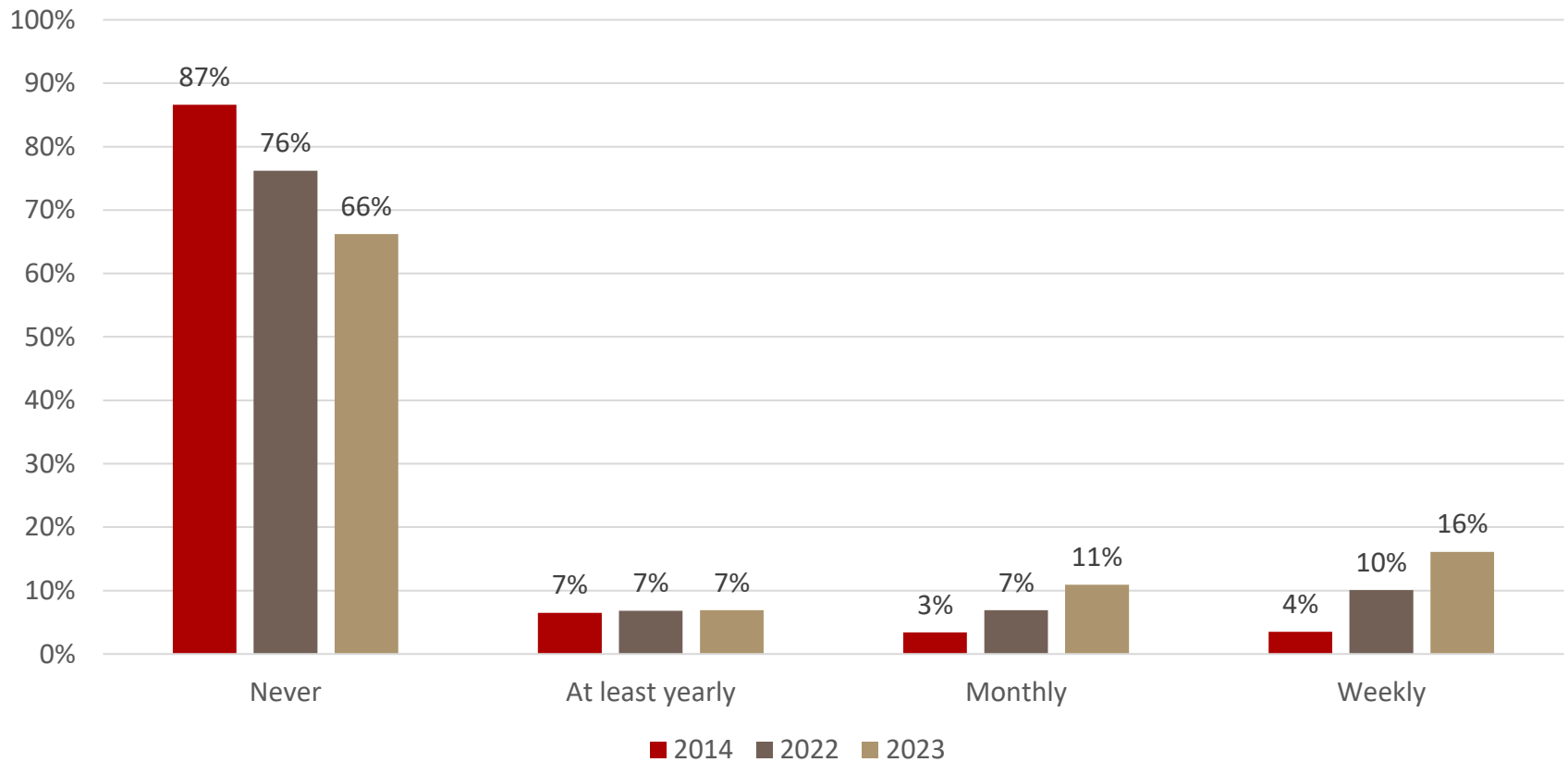
# Results: Online Panels

Past-year gambling participation



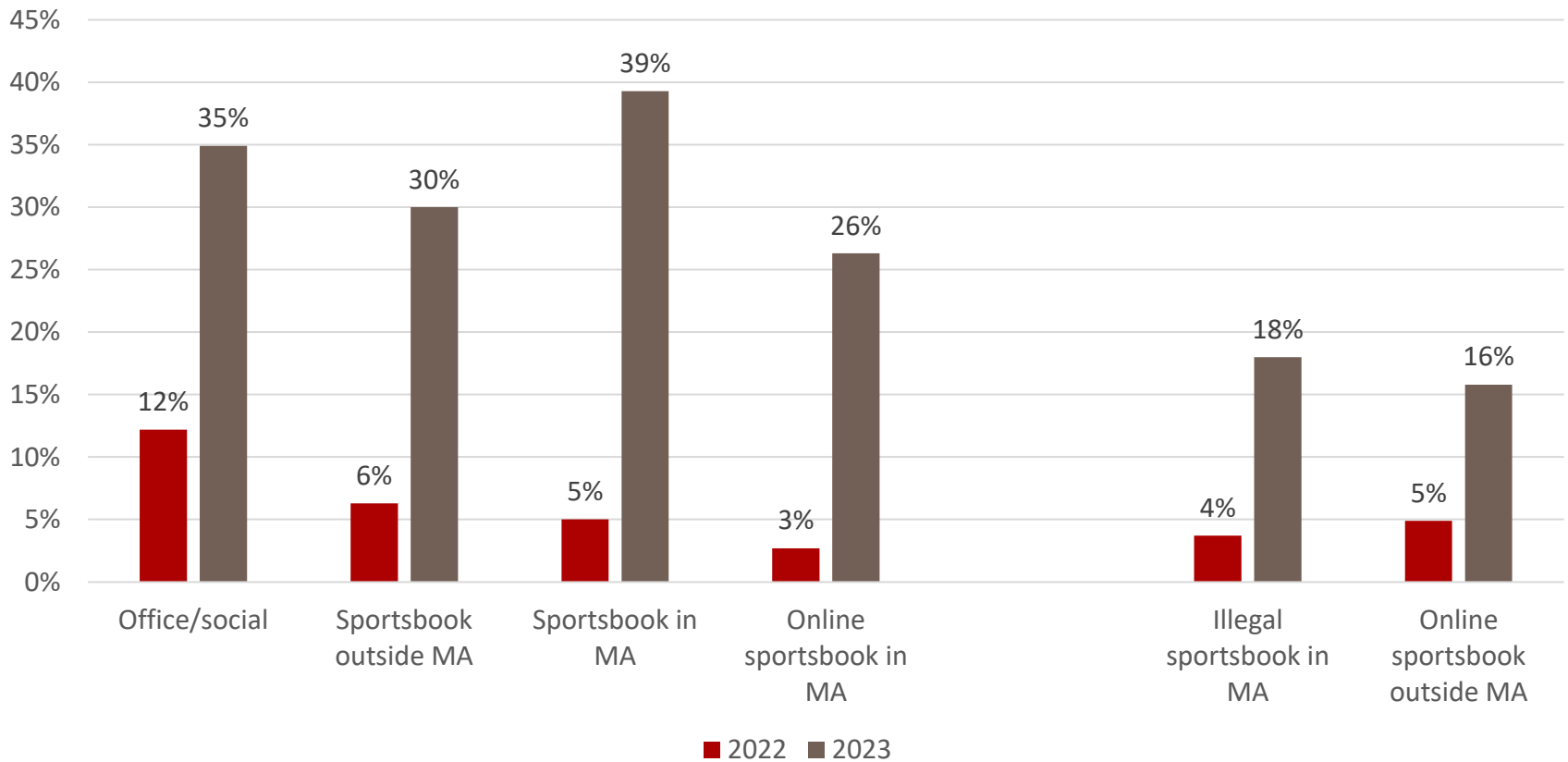
# Results: Online Panels

Sports betting frequency



# Results: Online Panels

## Sports betting outlets



# Results: Online Panel 2023

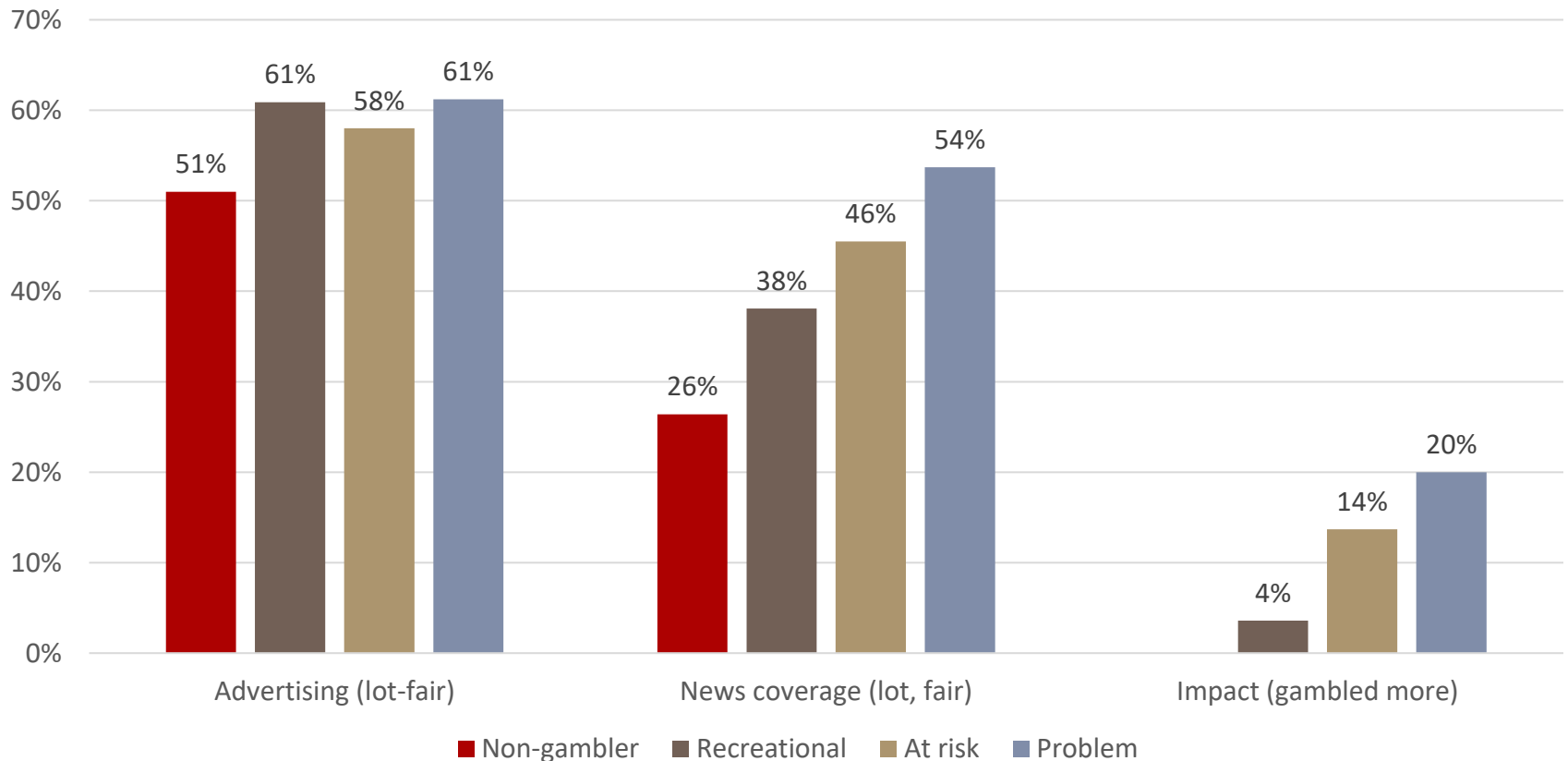
How much advertising in past year?	A lot or a fair amount	58.7%
How much news coverage in past year?	A lot or a fair amount	39.3%
Impact on gambling behavior	No impact	77.8%
	Caused me to gamble less	15.1%
	Caused me to gamble more	7.1%
Caused you to gamble more?	General news stories	28.6%
	Promotional advertising	64.3%
	New England Casino Assoc.	32.0%
	Targeted promotion	26.6%





# Results: Online Panel 2023

Among gambler groups (PPGM)



# Recommendations

An MGC report on advertising and gambling made specific recommendations to strengthen current gambling advertising regulations in Massachusetts ([Vander Linden et al., 2022](#)). These included:

- Strengthening protections of underage populations;
- Restricting advertising campaigns that target vulnerable groups;
- Requiring inclusion of messages about where to obtain help in all advertising and marketing materials;
- Limiting the intensity and frequency of advertising;
- Ensuring that restrictions include digital media and third parties;
- Prohibiting false or misleading advertising;
- Restricting communications about inducements, bonuses and credits.

# Recommendations

- Based on recent international review, we have several additional recommendations:
  - Limit advertising of higher-risk games;
  - Limit advertising focused on specific purposes (e.g., gambling as entertainment, gambling to support good causes);
  - Require that inducements not create a sense of urgency, be limited in value, and be offered only when customers are opening an account;
  - Restrict celebrity endorsements since these:
    - Tend to promote subsequent gambling involvement by young people;
    - Precipitate relapse in recovered addicts;
    - Counteract the effectiveness of public health messages advocating limited use.

# Recommendations

- Finally, given rapid evolution of advertising beyond conventional formats to online marketing, we recommend monitoring emerging forms of gambling advertising:
  - Regularly obtain information on trends, tactics & engagement with gambling advertising, marketing & influencer promotion strategies;
  - Measure potential reach of gambling-related posts on social media platforms;
  - Assess prevalence & effectiveness of gambling prevention and treatment messages within the broader social media landscape.

# Last but certainly not least

- Plan, fund and implement monitoring and surveillance of advertising and gambling behavior over time
  - Regularly obtain data on trends, tactics and engagement with gambling related advertising, marketing and influencer promotion strategies;
  - Measure potential reach of gambling related material on social media platforms;
  - Assess prevalence and effectiveness of prevention and treatment messages.

# Thank you!

For more information:

[www.umass.edu/seigma/reports](http://www.umass.edu/seigma/reports)

<https://massgaming.com/about/research-agenda/>



TO: Interim Chair Maynard, Commissioners O'Brien, Hill, and Skinner

FROM: Mark Vander Linden, Director of Research and Responsible Gaming,  
Bonnie Andrews, Research Manager

CC: Dean Serpa, Executive Director

DATE: June 20, 2024

RE: Proposed FY2025 Gaming Research Agenda

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**Background:**

The Expanded Gaming Act enshrines the role of research in understanding the social and economic effects and mitigating the negative consequences of casino gambling in Massachusetts. To this end, with the advice of the Gaming Policy Advisory Committee, the Commission is charged with carrying out an annual research agenda to comprehensively assess the impacts of casino gambling in Massachusetts. Specifically, [M.G.L. Chapter 23K §71](#) directs the research agenda to examine the social and economic effects of expanded gambling and to obtain scientific information relative to the neuroscience, psychology, sociology, epidemiology, and etiology of gambling. [M.G.L. Chapter 23N, §23](#) extends the scope of the research agenda to include an understanding of the effects of sports wagering in the commonwealth.

To support the successful implementation of these statutory mandates, the Commission adopted a strategic research plan that outlines research in seven key focus areas, including:

**Economic Impact Research**

The Economic Impact component of the Social and Economic Impacts of Gambling in Massachusetts (SEIGMA) study, conducted by a team from the UMass Donahue Institute, analyzes the fiscal and economic effects of expanded gaming across the Commonwealth. The economic research is intended to provide 1) neutral information of decision-making, 2) early warning signs of changes connected with casino gambling, and 3) help reducing gambling-related harm. To explore more about the economic impact research including completed reports: <https://massgaming.com/about/research-agenda-search/?cat=economic-impact>

**Social Impact Research**

The Social Impact component of the Social and Economic Impacts of Gambling in Massachusetts

(SEIGMA) study, conducted by a team from UMass Amherst, analyzes the social and health effects of expanded gaming across the Commonwealth. To explore more about the social impact research, including completed reports: <https://massgaming.com/about/research-agenda-search/?cat=social-impact-research>

### **Community-Engaged Research**

The objective of community-engaged research is to understand and address the impact of gambling in Massachusetts communities. The specific research topic or question is developed by the community through a community-driven process. To explore more about the community-engaged research, including completed reports: <https://massgaming.com/about/research-agenda-search/?cat=community-engaged-research>

### **Public Safety Research**

Public safety research examines gaming impacts on public safety, including crime, calls-for-service, collision, and driving under the influence data. This element of the Commission's research agenda has produced a baseline for each casino host and surrounding communities. Annual follow-up studies measure change in activity and highlight possible connections to the casino. To explore more about the public safety research, including completed reports: <https://massgaming.com/about/research-agenda-search/?cat=public-safety>

### **Responsible Gaming Program Evaluation**

The Commission is committed to offering effective, evidence-based responsible gaming programs and initiatives. Currently, these initiatives include statewide Voluntary Self Exclusion, PlayMyWay Play Management System, and the GameSense program. The introduction of mobile sports wagering will usher in additional responsible gaming tools, and measures. Ongoing and independent evaluation informs the overall responsible gaming strategy and future direction of these programs. To explore more about the evaluation research, including completed reports: <https://massgaming.com/about/research-agenda-search/?cat=responsible-gaming-program-evaluations>

### **Massachusetts Gaming Impact Cohort**

The Massachusetts Gambling Impact Cohort (MAGIC), was the first major longitudinal cohort study of gambling behavior in the United States. This study provided insights into demographic groups particularly at risk of experiencing gambling-related harm and provides information on how gambling and problem gambling develop, progress and remit, and will identify demographic groups particularly at risk of experiencing gambling-related harm. To explore more about the Massachusetts Gaming Impact Cohort, including completed reports: <https://massgaming.com/about/research-agenda-search/?cat=massachusetts-gambling-impact-cohort>

### **Data Sharing**

To improve transparency and build upon the existing research body of research, the Commission has a robust research library and data sharing portal. The Massachusetts Open Data Exchange (MODE) invites researchers of all disciplines to use available gaming-related data to advance the empirical evidence and knowledge base about casinos' social and economic effects on individuals and communities. To explore more about the Massachusetts Open Data Exchange: <https://massgaming.com/about/research-agenda/>



## Ongoing and Upcoming Research

The proposed FY25 research agenda is taking place in the context of several multi-year research projects currently underway or upcoming from previous years' research agendas:

- **Social and Economic Research**
  - **2024 Integrated Impact Report:** An integrated report looking at the overall social and economic impacts since Plainridge Park Casino opened in 2015. This report will include a section updating work conducted in 2014 to select communities in the Northeast matched to the MA casino host communities for purposes of counterfactual analysis of the economic impacts of casinos in MA, as well as a section on operations and economic impacts.
  - **Online Panel Survey 2023 Report:** This report will assess changes in gambling participation from 2022 to 2023, as well as the prevalence of problem gambling. A template for series of brief reports tracking participation and prevalence will also be produced
  - **Out of State Visitorship to MA Casinos Report:** Using a new anonymized dataset (Airsage), this report will use cellphone data to track out of state visitorship to MA casinos. This will provide a comparison to a study by researcher Clyde Barrow about this issue before casinos opened in MA, as well as impacts on the travel and tourism industry.
  - **Early Impact of Sports Wagering:** This analysis will assess impacts from currently licensed operators of retail sports betting, including the three Massachusetts casinos and two racetracks.
  - **Impacts of Advertising on Gambling Behavior in Massachusetts:** This report assesses evidence on whether and how advertising affects gambling behavior and presents recommendations to minimize gambling-related harm, with a specific focus on Massachusetts and the recent introduction of sports betting to the Commonwealth.
- **Public Safety**
  - **Plainville Public Safety Report:** A report on public safety in Plainville and surrounding communities using data through 2023.
  - **Sex Trafficking Study:** This study, awarded to Safe Exit Initiative, will assess the influence of casinos and casino resorts on sex trafficking in the Commonwealth.
- **Community-Engaged Research**
  - **Youth Perspectives on the Legalization of Sports Wagering:** This project's objective is to understand community perspectives on the social and public health impacts of legalized sports betting in Massachusetts. To meet this objective, NORC at the University of Chicago (NORC) will use a community-engaged research (CER) approach. NORC will engage a Community Advisory Board (CAB) to identify relevant research questions, co-design and support implementation of a study focused on the legalization of sports betting in Massachusetts and its impact on young adults, ages 18-25, and support analysis and dissemination of data and findings.

- ***Impact of Paid Media on Awareness and Participation of Sports Betting Among College Students:*** This community-engaged research project, awarded to Suffolk University, will focus on the social, health, and educational impacts of the introduction of legal sports wagering on higher education students in Massachusetts, particularly regarding their exposure to and participation in sports betting through paid media advertising.
- ***Gambling on Addiction Recovery: Community Perspectives on the Impact of Legalized Gambling in Massachusetts:*** This community-engaged research project, awarded to Texas Tech University, aims to understand the impact of legalized gambling and sports betting on addiction recovery communities in Massachusetts, building on the Social and Economic Impacts of Gambling in Massachusetts studies.
- **Evaluation of Responsible Gaming Initiatives**
  - ***GameSense Evaluation:*** The study will measure the effectiveness of the GameSense Program at meeting the goals stated in the GameSense Logic Model: 1) Create a responsible gaming enabled casino workforce, 2) Promote positive play, 3) Reduce gambling related harm.
  - ***New approaches to advance pre-commitment: Assessing whether a mandatory (versus voluntary) limit adherence feature and reward facilitates responsible gambling (Funded through the International Center for Responsible Gaming):*** This research will build evidence to assist with informed decisions about the strengths and weaknesses of play management systems, as well as contribute to the development of effective responsible gambling initiatives.
  - ***AI and Player Risk Identification and Response Research Services:*** A study on current and possible uses of artificial intelligence (AI) in the gaming industry, with a particular focus on marketing, player acquisition, game integrity, and responsible gaming initiatives, as well as implications for problem gambling and player health in the Commonwealth. This focus on responsible gaming will include reviewing evidence and evaluation data related to identifying and responding to behavioral risk on sports wagering mobile applications. This review may include research related to key elements of an effective system such as variables associated with risk, as well as evidence and evaluation data related to methods and strategies to intervene with individuals exhibiting risky behaviors.
- **Legislatively Mandated Studies on Sports Wagering:**
  - ***Kiosk Study:*** A prospective study on the feasibility, and potential impact, of allowing retail locations in the commonwealth to operate sports wagering kiosks
  - ***Sports Wagering Diversity Study:*** Study on the participation by minority business enterprises, women business enterprises, and veteran business enterprises in the sports wagering industry in the Commonwealth
  - ***iGaming Study:*** A study on the impact of iGaming on public health, with particular focus on comparison of participants with participants in other forms of gaming, comorbidity with

problem gambling, and impacts on youth under the age of 25

- **Collaboration with Community Mitigation Fund:** The Research and Responsible Gaming Division is also collaborating with the Community Affairs Division to support several ongoing and upcoming Gambling Harm Reduction community-engaged research projects.

## Proposed FY25 Gaming Research Agenda

The proposed FY25 Gaming Research Agenda is estimated to be \$1,930,000. This is a slight increase from the adopted FY24 budget of \$1,890,000. As the FY25 research priorities are established, we'll continue to work with the finance division to assure there is sufficient funding to support the research deliverables.

Of note, a proposed addition to the research agenda for this upcoming fiscal year adds additional focus specifically on youth and sports wagering.

Below, the proposed FY25 research agenda is shared with you in the following table and includes 1) general description of each project, 2) specific deliverables/activities, 3) a reference to the section of M.G.L. c. 23K or the 2022 Massachusetts Sports Wagering Act, and significance.

Proposed FY2025 Gaming Research Agenda	
<b>Social and Economic Research</b>	
The Expanded Gaming Act (M.G.L. c. 23K § 71) required the MGC to engage research to understand the social and economic effects of casino gambling in Massachusetts.	
Task/deliverable	Statutory and Practical Significance
Online Panel Survey (OPS) 2025 with Oversample of Young Adults and Expanded Section(s) on Young Adult Sports Betting 2025	<p>Relates to: M.G.L. c. 23K, § 71 (1) and §71 (2)(iii); M.G.L. c. 23N, § 23, § 23 (a) (iii)</p> <p>Online panel survey work will be continued with an expanded OPS25 that includes an oversample of young adults. Additional questions will be asked related to sports betting, with a particular focus on younger players and the social, emotional, and financial impacts of those activities. Where possible, questions will be aligned with the 2023 NCAA survey of young adults which assessed sports betting attitudes and behaviors among college students and young adults not attending college.</p>
Task/deliverable	Statutory and Practical Significance
Report on the Initial Social and Economic Impacts of Sports Betting in Massachusetts	<p>Relates to: M.G.L. c. 23N, § 23</p> <p>With sports betting at casinos since January 2023 and online since March 2023, the SEIGMA team will assess preliminary data related to the social and economic impacts of this activity and create a report on the initial impacts of sports betting in MA. This report may include the following:</p> <ul style="list-style-type: none"> <li>• Brief review of the OPS24 data with an expanded section on sports betting behavior that focuses on trends across the OPS surveys</li> <li>• Examine reallocation of sports betting spending using OPS23 and OPS24 data with likely inclusion of additional data available to UMDI from other sources</li> <li>• Integrated review of the initial economic impacts of sports betting, using data collected as part of OPS23 and OPS24</li> <li>• Review of the personal and fiscal impacts of sports betting,</li> </ul>

	<p>exploring and/or expanding ways that REMI can be used for such analysis</p> <ul style="list-style-type: none"> <li>• Observations and recommendations for future areas of research related to the introduction of sports betting in MA</li> </ul>
Task/deliverable	<p>Statutory and Practical Significance</p> <p>Relates to: M.G.L. c. 23K, §71 (2)(iv); M.G.L. c. 23N, § 23 (a) (iii)</p>
Springfield youth health surveys	Support addition of gambling-related questions to Springfield’s FY25 youth surveys

<b>Public Safety Research</b>	
<p>The MGC is examining changes in crime, calls for service, and collisions following the opening of casinos in Massachusetts. The intention is to demonstrate what changes in crime, disorder, and other public safety harms can be attributed directly or indirectly to the introduction of a casino and what strategies local communities need to implement to mitigate the harm.</p>	
Task/deliverable	Statutory and Practical Significance
<p>Prepare integrated report to assess the influence of gambling on public safety for all three casinos’ host and surrounding communities since opening, as well as statewide and local trends and host/surrounding communities compared to state.</p>	<p>Relates to: M.G.L. c. § 71 (2)(ii) M.G.L. c. 23N, § 23</p> <ul style="list-style-type: none"> <li>• Provides ongoing monitoring system of crime, calls for service, and traffic.</li> <li>• Allows for early detection and response to casino related problems that may arise.</li> <li>• Provides an opportunity for greater collaboration with local police chiefs and crime analysts.</li> <li>• This report will explore any changes in public safety which may be related to opening of the three MA casinos.</li> </ul>

<b>Community-Engaged Research</b>	
Task/deliverable	Statutory and Practical Significance
Support an estimated 1-2 new community driven research projects	Relates to: M.G.L. c. 23K, § 71 (3)(ii) M.G.L. c. 23N, § 23
	The objective of community-engaged research is to more deeply understand and address the impact of casino gambling in Massachusetts's communities. The specific research topic or question is developed by the community through a community-participatory process.
Task/deliverable	Statutory and Practical Significance
	Relates to: M.G.L. c. 23K, § 71 (3)(ii) M.G.L. c. 23K, § 61
Support new community-driven research projects through the Community Mitigation Fund	The Commission seeks to study and mitigate gambling related harms through a program with the Community Mitigation Fund, which will provide funding for community-engaged research projects.
<b>Data Sharing</b>	
Task/deliverable	Practical significance
Maintain existing datasets in the MODE repository and add additional datasets as they become available, including player card data as required.	Relates to: M.G.L. c. 23K, § 71 (2); Chapter 194, Section 97
	The purpose of MODE is to provide access to data generated by research projects funded and overseen by the MGC. Datasets from existing and ongoing research projects and player card data are publicly available with certain parameters.
Finalize infrastructure to share player data and procure first research projects using player data	
<b>Responsible Gaming Evaluation</b>	
The MGC is committed to offering effective, evidence-based responsible gaming programs and initiatives. Ongoing and independent evaluation informs the overall responsible gaming strategy and future direction of these programs.	
Task/deliverable	Statutory and Practical significance M.G.L. c. 23N, § 23

Positive Play Study	This study will identify the extent of positive play among Massachusetts players engaging in sports wagering, to define specific areas where positive play could be further supported, and to identify the extent of positive play among different player segments. The proposed study builds upon Positive Play studies conducted in 2021 and 2023.
Task/deliverable	Statutory and Practical significance M.G.L. c. 23K, § 71 (3); M.G.L. c. 23N, § 23
Evaluation of the Voluntary Self-Exclusion program	An evaluation of the voluntary self-exclusion program to build upon the previous evaluation of this program presented in 2018.

<b>Sports Wagering Research</b>	
<p><a href="#">The 2022 Massachusetts Sports Wagering Act, §23</a> extends the scope of the research agenda to understand the social and economic effects of sports wagering in the commonwealth and to obtain scientific information relative to the neuroscience, psychology, sociology, epidemiology and etiology of sports wagering. The sports wagering research agenda shall also include, but not be limited to: (i) an assessment of whether problem sports wagering is comorbid with problem gambling; (ii) an assessment as to whether the individuals participating in sports wagering are different than those who participate in other forms of gaming or gambling; (iii) an assessment of the impact of sports wagering on youth under the age of 25; (iv) an assessment of the impacts of sports wagering on college athletics and professional sports; and (v) the costs of implementing this chapter.</p>	
Task/deliverable	Statutory and Practical Significance
Study of student-athletes	Relates to: M.G.L. c. 23N, § 23 (a) (iv)
	There exists a critical need for targeted interventions that address the specific needs of college student-athletes in the context of legalized sports wagering. This project aims to use a Personalized Feedback-only approach specifically designed to address at-risk gambling behaviors among college athletes.
Task/deliverable	Statutory and Practical Significance
Sports wagering ad hoc study	Relates to: M.G.L. c. 23N, § 23
	Given the rapidly evolving sports wagering landscape, the Research and Responsible Gaming Division proposes to set aside funding to address emerging topics of interest in this area during FY25.

<b>Research Review</b>
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To ensure the highest quality research, the MGC has assembled a research review committee. This committee is charged with providing the MGC and research teams with advice and feedback on gaming research design, methods, and analysis. Where additional expertise is needed, the MGC seeks advice from experts with specific subject matter expertise to review reports and advise on research matters.

### Knowledge Translation and Exchange

To ensure findings from the MGC research program are accessed and used by key stakeholders, MGC engaged an organization with expertise in this area, the Gambling Research Exchange of Ontario (GREO), in FY23 to help develop a strategic plan, provide on-going training, consultation, and support to build in-house capacity to improve current KTE strategies, practices, and skill sets. In FY25, work on this initiative will include increasing capacity for data visualization, technical assistance related to knowledge mobilization, particularly related to MGC's model for conducting research and the revised Responsible Gaming Framework, and planning future research.

The **Gaming Research Advisory Committee** met for a presentation and discussion of this agenda on March 20, 2024. In this meeting, the following potential projects were identified as additional areas for the Commission to consider:

- A study of video gaming and esports, including but not limited to youth under the age of 25, and associations with problem gambling;
- An updated evaluation of the Voluntary Self-Exclusion program (added to the research agenda above)
- A continued commitment to knowledge translation and exchange, and specifically summarizing findings to date to inform policy and regulation.

The research agenda was initially presented to the Commission on March 28, 2024 and was presented to the **Gaming Policy Advisory Committee** (GPAC) for advice and discussion as required by M.G.L. Chapter 23K §71 on June 5, 2024. Feedback from GPAC included:

- Endorsement of the current plan to set aside funds for an ad hoc study of sports wagering;
- A request for continued focus on employment impacts, and particularly potential impacts of initiatives such as kiosks, iLottery, and iGaming on employment, as well as locally in the Springfield area for issues related to workforce development;
- For MGC to assure equity principles are incorporated at each step of the research process;
- Impacts of gaming on veterans.

In response to this feedback, an updated evaluation of the Voluntary Self-Exclusion program was added to the research agenda as detailed above. In addition, the following is noted:

- In addition to equity considerations built into the RFR process, our draft Guidance for Researchers incorporates equity principles throughout the research process. We have sent this draft Guidance for Researchers to the Research Review Committee and GRAC for feedback and are planning to present revisions on these documents to these groups at upcoming meetings.
- In terms of continued focus on employment impacts, the draft kiosk study report includes employment-related considerations. Given limited resources for the iGaming study, the current



RFR focuses primarily on social impact rather than economic impact; however, [recent data](#) is available concerning economic impacts in states that have legalized iGaming. As iLottery is outside of MGC's regulatory purview, no upcoming studies are planned that focus on iLottery. Lastly, we will continue our focus on local employment-related impacts in casino host and surrounding communities as part of our ongoing research agenda.

- The last MGC-funded study with veterans as a population of focus was released [in 2018](#). Our community-engaged research RFR, revised in 2024, gives veterans as a specific example of a potential community of focus for this research, and we would welcome proposals focusing on this population.



## MASSACHUSETTS GAMING COMMISSION

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**To:** Interim Chair Maynard and Commissioners Hill, O'Brien, and Skinner  
**From:** Dean Serpa, Douglas O'Donnell, John Scully, and Derek Lennon  
**Date:** June 20, 2024  
**Re:** Fiscal Year 2025 (FY25) Budget Recommendations

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### Summary

The Massachusetts Gaming Commission's (MGC) initial Fiscal Year 2025 (FY25) budget and assessment projections are composed of the following:

- **Gaming**
  - \$33.13M for gaming regulatory costs, including funding for 86.19 full-time equivalents (FTEs) and 3 contract positions;
  - \$2.12M for the Commonwealth's indirect costs;
  - \$3.99M for the Office of the Attorney General's (AGO) gaming operations, inclusive of Massachusetts State Police (MSP) assigned to the AGO;
  - \$75K for the Alcohol and Beverage Control Commission (ABCC); resulting in,
  - \$39.87M total funding of the Gaming Control Fund requiring an assessment of \$36.13M
- **Racing**
  - \$2.01M for racing regulatory costs, including funding for 5.48 FTEs;
  - \$111.8K for the Commonwealth's indirect costs;
  - \$2.12M combined total of regulated racing costs.
- **Community Mitigation Fund**
  - \$483.42K for grant review and sub-recipient monitoring costs, including funding for 2.63 FTEs
- **Sports Wagering Control Fund**
  - \$10.08M for sports wagering regulatory costs, including funding for 43.32 FTEs and 5 contractors;
  - \$520.35K for the Commonwealth's indirect costs
  - \$500K for Office of the Attorney General
  - \$11.10M total funding of the Sports Wagering Control Fund requiring an assessment of \$10.65M
- **Public Health Trust Fund**
  - \$5.95M for the research and responsible gaming agenda, inclusive of 3 FTEs. The Commission's research and responsible gaming office will be funded by the Public Health Trust Fund (PHTF)



Massachusetts Gaming Commission

### Total Budget

The total budget presented today, excluding racing capital and promotional trust funds that benefit licensees and grants from the Community Mitigation Fund, is \$59.54M and funds 140.62 FTEs and 8 contract employees.

Appropriation	Grouping Name	FY25 Budget	FTEs	Contractors
<b>Gaming Control Fund 10500001</b>				
	MGC Regulatory Costs	\$33,132,023.00		
	Indirect	\$2,668,901.53		
	Office of Attorney General and AGO MSP	\$3,998,094.24		
	Alcohol and Beverage Control Commission	\$75,000.00		
<b>10500001 Total</b>		<b>\$39,874,018.77</b>	<b>86.19</b>	<b>3.00</b>
<b>Racing Development and Oversight Fund 10500003</b>				
	MGC Regulatory Costs	\$2,011,355.03		
	Indirect	\$111,802.56		
<b>10500003 Total</b>		<b>\$2,123,157.59</b>	<b>5.48</b>	<b>-</b>
<b>Community Mitigation Fund 10500004</b>				
	MGC Regulatory Costs	\$483,416.36		
<b>10500004 Total</b>		<b>\$483,416.36</b>	<b>2.63</b>	<b>-</b>
<b>Sports Wagering Control Fund 10501384</b>				
	MGC Regulatory Costs	\$10,072,410.22		
	Research and Responsible Gaming/PHTF	\$12,100.00		
	Indirect	\$520,356.13		
	Office of Attorney General and AGO MSP	\$500,000.00		
<b>10501384 Total</b>		<b>\$11,104,866.35</b>	<b>43.32</b>	<b>5.00</b>
<b>Public Health Trust Fund 40001101</b>				
	MGC Regulatory Costs	\$10,733.14		
	Research and Responsible Gaming/PHTF	\$5,945,766.84		
<b>40001101 Total</b>		<b>\$5,956,499.98</b>	<b>3.00</b>	<b>-</b>
<b>Grand Total</b>		<b>\$59,541,959.05</b>	<b>140.62</b>	<b>8.00</b>

### Fiscal Year 2025 Massachusetts Gaming Commission Budget Overview

The MGC's annual budget building process begins in February and concludes once the Commission approves a budget in June. The MGC Office of Finance met with each division/bureau head within the MGC and developed spending and revenue projections that are best estimate representations of what will be needed in FY25 to operate the Commission, as well as what can be expected for revenue based on the Commission's current fee structures. These requests were then reviewed by the CFAO, the Executive Director, and the Treasurer of the Commission. A third review was conducted by representatives of both the gaming licensees and sports wagering licensees in a virtual meeting on May 16, 2024. The meeting included a comprehensive review of the Commission's budget and staffing levels.

The MGC's FY25 budget of \$59.54M represents a \$2.78M (4.9%) increase over the currently approved FY24 budget. The Commission approved an initial FY24 budget funding 132.62 FTEs and 6 contractors. As of the writing of this memorandum, the Commission has increased the approved FTEs to 135.62 FTEs with three (3) additional positions being added to the sports wagering division.



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In FY25, we recommend increasing the number to 140.62 FTEs and increasing contractors from six (6) to eight (8).

Appropriation	FY24 Initial FTEs	FY24 Initial Contractors	FY24 Current FTEs	FY24 Current Contractors	FY25 FTEs	FY25 Contractors
<b>Gaming Control Fund 10500001</b>	<b>87.03</b>	<b>3.00</b>	<b>85.12</b>	<b>3.00</b>	<b>86.19</b>	<b>3.00</b>
<b>Racing Development and Oversight Fund 10500003</b>	<b>7.35</b>	<b>-</b>	<b>5.48</b>	<b>-</b>	<b>5.48</b>	<b>-</b>
<b>Community Mitigation Fund 10500004</b>	<b>2.00</b>	<b>-</b>	<b>2.00</b>	<b>-</b>	<b>2.63</b>	<b>-</b>
<b>Sports Wagering Control Fund 10501384</b>	<b>33.24</b>	<b>3.00</b>	<b>40.02</b>	<b>3.00</b>	<b>43.32</b>	<b>5.00</b>
<b>Public Health Trust Fund 40001101</b>	<b>3.00</b>	<b>-</b>	<b>3.00</b>	<b>-</b>	<b>3.00</b>	<b>-</b>
<b>Grand Total</b>	<b>132.62</b>	<b>6.00</b>	<b>135.62</b>	<b>6.00</b>	<b>140.62</b>	<b>8.00</b>

Appropriation	Grouping Name	FY24	FY25	Variance	% Variance
<b>Gaming Control Fund 10500001</b>					
	MGC Regulatory Costs	\$31,610,283.60	\$33,132,023.00	\$1,521,739.40	4.81%
	Indirect	\$2,605,320.52	\$2,668,901.53	\$63,581.01	2.44%
	Office of Attorney General and AGO MSP	\$3,924,122.55	\$3,998,094.24	\$73,971.69	1.89%
	Alcohol and Beverage Control Commission	\$75,000.00	\$75,000.00	\$0.00	0.00%
	<b>10500001 Total</b>	<b>\$38,214,726.67</b>	<b>\$39,874,018.77</b>	<b>\$1,659,292.10</b>	<b>4.34%</b>
<b>Racing Development and Oversight Fund 10500003</b>					
	MGC Regulatory Costs	\$1,968,738.82	\$2,011,355.03	\$42,616.21	2.16%
	Indirect	\$140,146.24	\$111,802.56	-\$28,343.68	-20.22%
	<b>10500003 Total</b>	<b>\$2,108,885.06</b>	<b>\$2,123,157.59</b>	<b>\$14,272.53</b>	<b>0.68%</b>
<b>Community Mitigation Fund 10500004</b>					
	MGC Regulatory Costs	\$385,392.33	\$483,416.36	\$98,024.03	25.43%
	<b>10500004 Total</b>	<b>\$385,392.33</b>	<b>\$483,416.36</b>	<b>\$98,024.03</b>	<b>25.43%</b>
<b>Sports Wagering Control Fund 10501384</b>					
	MGC Regulatory Costs	\$9,160,877.22	\$10,072,410.22	\$911,533.00	9.95%
	Research and Responsible Gaming/PHTF	\$12,100.00	\$12,100.00	\$0.00	0.00%
	Indirect	\$477,774.95	\$520,356.13	\$42,581.18	8.91%
	Office of Attorney General and AGO MSP	\$500,000.00	\$500,000.00	\$0.00	0.00%
	<b>10501384 Total</b>	<b>\$10,150,752.17</b>	<b>\$11,104,866.35</b>	<b>\$954,114.18</b>	<b>9.40%</b>
<b>Public Health Trust Fund 40001101</b>					
	MGC Regulatory Costs	\$15,951.45	\$10,733.14	-\$5,218.31	-32.71%
	Research and Responsible Gaming/PHTF	\$5,884,648.17	\$5,945,766.84	\$61,118.67	1.04%
	<b>40001101 Total</b>	<b>\$5,900,599.62</b>	<b>\$5,956,499.98</b>	<b>\$55,900.36</b>	<b>0.95%</b>
	<b>Grand Total</b>	<b>\$56,760,355.85</b>	<b>\$59,541,959.05</b>	<b>\$2,781,603.20</b>	<b>4.90%</b>

The Commission's Office of Finance developed a revised cost allocation method for charging the costs of staff that work across programs in racing, gaming, and/or sports wagering at the beginning of FY24. The method used was to take the positions that work directly on racing, sports wagering, and gaming as a subset and then determine each fund's share of that subset. Those percentages were then applied to staff that are not directly assigned to a given fund. The distribution arrived at 65% to the gaming control fund, 28.5% to the sports wagering control fund, and 6.5% to the racing oversight and development fund. At the first FY24 quarterly budget update we revised that allocation to 67% gaming control fund, 30% sports wagering control fund, and 3% racing oversight and development fund due to revenue declines in racing. The table at the top of this page shows that change and how it impacted FTE counts across appropriations.

In FY25, the MGC will continue allocating funds to each division/bureau and tracking contractual commitments, expenditures, and salaries, against each division/bureau budget. The Commission will be using the expense budget feature in the Massachusetts Management and Accounting Reporting System (MMARS) to establish these budgets and automate the process of tracking each budget to actual expenditures and commitments.



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The following section of this memorandum is a summary by appropriation of spending anticipated for: the Gaming Control Fund, the Community Mitigation Fund, the Racing Oversight and Development Fund, The Sports Wagering Control Fund, and the Public Health Trust Fund. Immediately following each summary is a chart that demonstrates significant variances between FY24 and FY25 for each division/bureau. Attachment B to this document provides a view of each division's budget by object class, object code, and then specific budget item. This same information can be found in Attachment C, but the view is ordered first by object class, then object code, then division, and finally by specific budget item.

### **Gaming Control Fund Regulatory vs. Statutory Costs**

It is important to distinguish between the different components of the proposed budget for FY25 and understand the difference between regulatory and statutory costs. The composition of the Gaming Control Fund budget can be broken up into two areas. The first area comprises the regulatory costs of the Massachusetts Gaming Commission to regulate category 1 and 2 facilities. These regulatory costs are directly within control of the Gaming Commission. The second area comprises statutory costs that are assessments contained in the Expanded Gaming Act but are not within the budgetary discretion of the Gaming Commission. The statutory costs are the responsibility of our licensees to pay. Most of this memorandum focuses on the regulatory costs of the MGC. Below is a summary of the ~\$6.74M statutorily required costs:

- \$3.99M for the costs of the Attorney General's Office (C. 12 § 11M),
- \$75K for the Alcoholic Beverage Control Commission (C. 10 § 72A), and
- \$2.67M for Commonwealth of Massachusetts Assessed Indirect Costs (ANF Bulletin 5).

The Commission's regulatory FY25 budget projections total \$33.13M, and fund 10 divisions. The funding level of each division, along with the change from the previous year, is laid out in further detail later in this memorandum.

### **Gaming Control Fund 1050-0001**

The MGC's currently approved FY24 budget for the Gaming Control Fund is \$38.21M. The MGC is recommending an FY25 budget of \$39.87M, which is a 4.34% increase over the currently approved FY24 budget. The MGC's regulatory costs funded by the Gaming Control Fund increased by 4.81% from \$31.61M in FY24 to \$33.13M in FY25, the statutorily required costs increased by 2.08% from \$6.6M in FY24 to \$6.74M in FY25. The table below summarizes significant changes in our regulatory costs by spending category between fiscal years:



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Object								
Fund	Category	Class	object class name	FY24	FY25	Variance	% Variance	Variance Notes
<b>Gaming Control Fund 10500001</b>								
								Turnover projected at 5% of total payroll. Raises of 3%. Moved .625 FTEs off of gaming to community mitigation fund, and added 1.7 new FTEs to this appropriation.
Regulatory Costs	AA		REGULAR EMPLOYEE COMPENSATION	\$8,644,526.91	\$8,737,689.97	\$ 93,163.06	1.07%	
	BB		REGULAR EMPLOYEE RELATED EXPEN	\$92,617.00	\$95,994.50	\$ 3,377.50	3.52%	
	CC		SPECIAL EMPLOYEES	\$176,800.00	\$192,640.00	\$ 15,840.00	8.22%	Raises for contract employees.
	DD		PENSION & INSURANCE RELATED EX	\$3,670,880.82	\$3,828,205.39	\$ 157,324.57	4.11%	Increase in fringe rate
	EE		ADMINISTRATIVE EXPENSES	\$683,354.92	\$708,291.92	\$ 24,937.00	3.52%	
	FF		FACILITY OPERATIONAL EXPENSES	\$20,000.00	\$20,000.00	\$ -	0.00%	
								Renewed lease for office space for five (5) years. Received 3 months of free rent at end of current lease.
	GG		ENERGY COSTS AND SPACE RENTAL	\$1,074,392.38	\$817,235.42	\$ (257,156.96)	-31.47%	
	HH		CONSULTANT SVCS (TO DEPTS)	\$964,883.31	\$988,500.00	\$ 23,616.69	2.39%	
								Increases in Gaming Enforcement Unit collective bargaining agreements both for state police and municipal police
	JJ		OPERATIONAL SERVICES	\$11,779,907.93	\$12,770,229.07	\$ 990,321.14	7.75%	
	KK		EQUIPMENT PURCHASE	\$62,000.00	\$62,000.00	\$ -	0.00%	
	LL		EQUIPMENT LEASE-MAINTAIN/REPAR	\$47,807.90	\$65,607.90	\$ 17,800.00	27.13%	New lease for an additional copier
	NN		INFRASTRUCTURE:	\$30,000.00	\$30,000.00	\$ -	0.00%	
								Decrease in anticipated grant funding for HR/Diversity division.
	PP		STATE AID/POL SUB	\$150,000.00	\$90,000.00	\$ (60,000.00)	-66.67%	
								Anticipated costs of a new licensing management system.
	UU		IT Non-Payroll Expenses	\$4,213,112.43	\$4,725,628.83	\$ 512,516.40	10.85%	
10500001	Total			\$31,610,283.60	\$33,132,023.00	\$ 1,521,739.40	4.59%	

The MGC Regulatory portion of the Gaming Control Trust supports 10 divisions/bureaus. The table below shows each division's/bureau's costs of providing regulatory oversight to expanded gaming in FY24 and FY25. In FY25, we are requesting funding for This item funds 86.19 FTEs and 3 contract positions. Overall regulatory spending increased by 4.59% or \$1.52M from FY24 current projections. Most of the increase comes from collective bargaining agreement increases in the Gaming Enforcement Unit (GEU) and the development of a new licensing system (this item is split 70% funded from this item and 30% funded from the sports wagering control fund).

Below is a table that compares each division by the currently approved FY24 budget and the proposed FY25 budget, for the Regulatory portion of the Gaming Control Fund, along with a brief explanation for any significant funding variances. Further details for budgets by each division are provided in attachments B and C:



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Fund	Category	Unit	Unit Name	FY24	FY25	Variance	%	Variance Notes
<b>Gaming Control Fund 10500001</b>								
	<b>MGC Regulatory Costs</b>	<b>1000</b>	Finance and Administration	\$2,181,164.80	\$1,991,585.18	\$ (189,579.62)	-8.69%	Signed a 5 year extension of office lease that included a discount of 3 months of the expiring lease.
		<b>1100</b>	Human Resources	\$1,427,109.58	\$1,443,070.55	\$ 15,960.97	1.12%	
		<b>1200</b>	Legal	\$1,430,780.08	\$1,608,076.94	\$ 177,296.86	12.39%	Annualization of FY24 hires. Increase in hearing officer costs, offsite storage costs, memberships, and conference registrations
		<b>1300</b>	Executive Director	\$561,856.57	\$581,787.24	\$ 19,930.67	3.55%	
		<b>1400</b>	Information Technology	\$5,765,141.71	\$6,083,316.53	\$ 318,174.82	5.52%	Costs of new data center, annualization of FY24 hires, and portions of 2 new positions for FY25.
		<b>1500</b>	Commissioners	\$1,047,419.33	\$1,135,910.86	\$ 88,491.53	8.45%	Annualization of FY24 raises.
		<b>1800</b>	Communications	\$309,211.13	\$361,969.78	\$ 52,758.65	17.06%	Addition of new employee for 50% of the year.
		<b>1900</b>	Ombudsman	\$170,091.23	\$85,666.01	\$ (84,425.22)	-49.64%	Moved portions of staff from here to community mitigation fund
		<b>5000</b>	Investigations and Enforcement Bureau	\$17,995,010.46	\$19,043,484.14	\$ 1,048,473.68	5.83%	GEU CBA increases
		<b>7000</b>	Licensing Division	\$986,143.73	\$1,500,980.15	\$ 514,836.42	52.21%	Development of new licensing management system.
		<b>All</b>	All Divisions	-\$263,645.02	-\$703,824.38	\$ (440,179.36)	166.96%	
		<b>10500001 Total</b>		<b>\$31,610,283.60</b>	<b>\$33,132,023.00</b>	<b>\$ 1,521,739.40</b>	<b>4.81%</b>	

### Racing Development and Oversight Trust Fund 1050-0003

This item funds the operations of the Racing division. Most of the funding from this appropriation is payroll, seasonal payroll, and fringe related costs. Costs of the division are payroll (seasonal and full time), fringe costs, drug and laboratory testing, ISA to DPH, and purchased client services for economic hardship payments, and the jockey guild. As was reported in the first quarterly budget update for FY24, racing revenues are down. We are keeping an eye on this item and this year's budget reflects that. This item is proposed to fund 3 full-time racing employees, as well as 3% of MGC staff supporting racing operations.

Below is a table that compares the currently approved FY24 budget and the proposed FY25 budget for the Racing Oversight and Development Fund, along with a brief explanation for any large variances. Of importance is the fact that we have made cuts to all object classes within racing besides payroll, seasonal payroll, lab testing, and the statutorily required payments under the MM object class. We had made a request of the Legislature to amend the language of the Racehorse Development Fund to allow us to spend some of the fund for administrative purposes given that racing revenue streams are declining. That request was not adopted in this year's budget cycle, however, it is an item we would like to have additional discussions with the Legislature in the coming year. Further details for budgets by each division funded from the Racing Development and Oversight Trust fund are provided in attachments B and C:



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Fund	Category	Object Class	object class name	FY24	FY25	Variance	% Variance	Variance Notes
<b>Racing Development and Oversight Fund 10500003</b>								
	<b>MGC Regulatory Costs</b>	<b>AA</b>	REGULAR EMPLOYEE COMPENSATION	\$561,361.13	\$611,888.13	\$50,527.00	8.26%	This item funds 3 FTEs and 3% of support positions
		<b>BB</b>	REGULAR EMPLOYEE RELATED EXPEN	\$13,000.00	\$6,000.00	-\$7,000.00	-116.67%	
		<b>CC</b>	SPECIAL EMPLOYEES	\$487,240.00	\$487,240.00	\$0.00	0.00%	Seasonal Salaries
		<b>DD</b>	PENSION & INSURANCE RELATED EX	\$235,337.69	\$306,251.90	\$70,914.21	23.16%	
		<b>EE</b>	ADMINISTRATIVE EXPENSES	\$42,385.00	\$27,060.00	-\$15,325.00	-56.63%	Moved administrative costs to finance and spread across gaming and sports wagering
		<b>FF</b>	FACILITY OPERATIONAL EXPENSES	\$42,000.00	\$12,000.00	-\$30,000.00	-250.00%	Eliminated miscellaneous equipment item and reduced seasonal uniforms.
		<b>HH</b>	CONSULTANT SVCS (TO DEPTS)	\$25,000.00	\$10,000.00	-\$15,000.00	-150.00%	Reduced hearing officers to align closer to FY24 actuals
		<b>JJ</b>	OPERATIONAL SERVICES	\$396,500.00	\$391,000.00	-\$5,500.00	-1.41%	Lab Testing
		<b>LL</b>	EQUIPMENT LEASE-MAINTAIN/REPAR	\$915.00	\$915.00	\$0.00	0.00%	
		<b>MM</b>	PURCHASED CLIENT/PROGRAM SVCS	\$155,000.00	\$155,000.00	\$0.00	0.00%	statutorily required costs (hardship payments, jockey's guild, compulsive gambling ISA)
		<b>UU</b>	IT Non-Payroll Expenses	\$10,000.00	\$4,000.00	-\$6,000.00	-150.00%	Reduced maintenance for racing licensing system and
	Indirect	<b>EE</b>	ADMINISTRATIVE EXPENSES	\$140,146.24	\$111,802.56	-\$28,343.68	-25.35%	
<b>10500003 Total</b>				<b>\$2,108,885.06</b>	<b>\$2,123,157.59</b>	<b>\$14,272.53</b>	<b>0.67%</b>	
<b>Grand Total</b>				<b>\$2,108,885.06</b>	<b>\$2,123,157.59</b>	<b>\$14,272.53</b>	<b>0.67%</b>	

### Community Mitigation Fund 1050-0004

205 CMR 153.05 allows the Commission to expend funds for the administration and oversight of the Community Mitigation grant program. The regulation requires the Commission to annually approve a budget not to exceed 10% of the funds available in the account for the fiscal year. The proposed budget, as shown in the table below, would fund 2.625 FTEs, in-state travel for subrecipient monitoring purposes, and the maintenance of a grant management database. This fund increased by 20.28%, but that is all accounted for in the shift of payroll and the corresponding fringe benefits from gaming to the community mitigation fund.

Fund	Category	Object Class	object class name	FY24	FY25	Variance	% Variance	Variance Notes
<b>Community Mitigation Fund 10500004</b>								
	<b>MGC Regulatory Costs</b>	<b>AA</b>	REGULAR EMPLOYEE COMPENSATION	\$213,962.43	\$294,181.02	\$80,218.59	27.27%	Shift of 0.625 FTE from gaming to here
		<b>BB</b>	REGULAR EMPLOYEE RELATED EXPEN	\$5,000.00	\$5,000.00	\$0.00	0.00%	
		<b>DD</b>	PENSION & INSURANCE RELATED EX	\$93,552.53	\$131,735.34	\$38,182.81	28.98%	
		<b>EE</b>	ADMINISTRATIVE EXPENSES	\$22,877.37	\$2,500.00	-\$20,377.37	-815.09%	Decrease in administrative expenses
		<b>UU</b>	IT Non-Payroll Expenses	\$50,000.00	\$50,000.00	\$0.00	0.00%	
<b>10500004 Total</b>				<b>\$385,392.33</b>	<b>\$483,416.36</b>	<b>\$98,024.03</b>	<b>20.28%</b>	

### Sports Wagering Control Fund 1050-1384

In August of 2022 the MA Legislature and Governor approved a bill that legalized sports betting in the Commonwealth. The Gaming Commission was designated as the regulator. Included in that bill was a sports wagering control fund to provide a means for the Commission to spend money on regulating the industry. The Commission approved an FY24 sports wagering budget of \$10.15M which continued the work of FY23 of initial suitability reviews, consulting, and outside counsel assistance to help stand up the regulatory structure of sports wagering, as well as provided funding for the first full year of regulating the sports wagering industry in MA. In FY25 staff are recommending a budget of \$11.10M, which represents a 9.40% increase. The majority of the increase



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is composed of the annualization of salaries approved for part of FY24, 3.30 new FTEs in FY25, 2 (two) new contract positions, and 30% of the FY25 anticipated cost of the purchase and development of a new Licensing Management System. The table below shows the changes from FY24 to FY25 by spending category.

Fund	Category	Object Class	object_class_name	FY24	FY25	Variance	% Variance	Variance Notes
<b>Sports Wagering Control Fund 10501384</b>								
	<b>MGC Regulatory Costs</b>	<b>AA</b>	REGULAR EMPLOYEE COMPENSATION	\$3,866,902.69	\$4,532,647.42	\$665,744.73	17.22%	Annualization of FY24 hires and addition of 3.3 FTEs and 2 Contract FTEs
		<b>BB</b>	REGULAR EMPLOYEE RELATED EXPEN	\$7,000.00	\$18,500.00	\$11,500.00	164.29%	Additional travel anticipated by sports wagering division
		<b>CC</b>	SPECIAL EMPLOYEES	\$147,600.00	\$154,000.00	\$6,400.00	4.34%	
		<b>DD</b>	PENSION & INSURANCE RELATED EX	\$1,684,078.53	\$2,009,898.03	\$325,819.50	19.35%	
		<b>EE</b>	ADMINISTRATIVE EXPENSES	\$34,500.00	\$92,350.00	\$57,850.00	167.68%	Increase for investigatory travel related expenses as well as for staff that are in the sports wagering division.
		<b>GG</b>	ENERGY COSTS AND SPACE RENTAL	\$393,114.12	\$311,353.26	-\$81,760.86	-20.80%	Signed a 5 year extension of office lease that included a discount of 3 months of the expiring lease.
		<b>HH</b>	CONSULTANT SVCS (TO DEPTS)	\$1,692,297.00	\$1,462,214.29	-\$230,082.71	-13.60%	Decrease of outside consultant assistance for suitability reviews and now shifting towards vendor reviews
		<b>JJ</b>	OPERATIONAL SERVICES	\$291,519.27	\$461,595.28	\$170,076.01	58.34%	Restored decrease for GEU
		<b>OO</b>	(blank)	\$318,938.67	\$0.00	-\$318,938.67	-100.00%	Removed set aside that was granted in FY24 for flexibility in hiring and contractual assistance. 30% of new licensing management system
		<b>UU</b>	IT Non-Payroll Expenses	\$724,926.94	\$1,029,851.94	\$304,925.00	42.06%	
	Research and Res	<b>UU</b>	IT Non-Payroll Expenses	\$12,100.00	\$12,100.00	\$0.00	0.00%	
	Indirect	<b>EE</b>	ADMINISTRATIVE EXPENSES	\$477,774.95	\$520,356.13	\$42,581.18	8.91%	
	Office of Attorney	<b>OO</b>	(blank)	\$500,000.00	\$500,000.00	\$0.00	0.00%	
<b>10501384 Total</b>				<b>\$10,150,752.17</b>	<b>\$11,104,866.35</b>	<b>\$954,114.18</b>	<b>9.40%</b>	

### Public Health Trust Fund 4000-1101

The Research and Responsible Gaming (RRG) office is a statutorily required component of the MGC and was funded from the Public Health Trust Fund, beginning in FY20. Through a collaborative process with DPH and EOHHHS, the MGC's RRG division will continue to be funded from the PHTF in FY25. Funding for the office has been increased by ~1% from an approved FY24 budget of \$5.90M to an FY25 proposal of \$5.96M. Below is a table comparing FY24 to the FY25 proposal.

Fund	Object Class	object_class_name	FY24	FY25	Variance	% Variance	Variance Notes
<b>Public Health Trust Fund 40001101</b>							
	<b>AA</b>	REGULAR EMPLOYEE COMPENSATION	\$334,980.49	\$368,504.49	\$33,524.00	10.01%	
	<b>BB</b>	REGULAR EMPLOYEE RELATED EXPEN	\$7,250.00	\$7,250.00	\$0.00	0.00%	
	<b>DD</b>	PENSION & INSURANCE RELATED EX	\$146,466.23	\$163,895.06	\$17,428.83	11.90%	
	<b>EE</b>	ADMINISTRATIVE EXPENSES	\$420,902.90	\$425,850.43	\$4,947.53	1.18%	
	<b>FF</b>	FACILITY OPERATIONAL EXPENSES	\$1,000.00	\$1,000.00	\$0.00	0.00%	
	<b>HH</b>	CONSULTANT SVCS (TO DEPTS)	\$3,655,000.00	\$3,655,000.00	\$0.00	0.00%	
	<b>JJ</b>	OPERATIONAL SERVICES	\$15,000.00	\$15,000.00	\$0.00	0.00%	
	<b>PP</b>	STATE AID/POL SUB	\$1,320,000.00	\$1,320,000.00	\$0.00	0.00%	
<b>40001101 Total</b>			<b>\$5,900,599.62</b>	<b>\$5,956,499.98</b>	<b>\$55,900.36</b>	<b>0.95%</b>	



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### Exposures in the FY25 Budget Proposal

FY25 was another challenging budget to develop. While the Commission has established much of the framework for regulating sports wagering, we are still working through many of the day-to-day elements of being a mature and robust sports wagering regulator. The FY25 budget does have some recurring gaming exposures, as well as some new sports wagering exposures. The following are a brief list of exposures:

- Funded the minimum required by our insurance policy for litigation costs in the legal budget.
- Funded MSP overtime at consistent levels and only increased for the CBA rate adjustments.
- Funded only 3 months of consulting support for sports wagering.
- Included only 12 months of outside CPA assistance for reviewing sports wagering vendor applications. There is another potential 9 months of these reviews that could carry into FY26.
- Revenue streams and funding for racing continue to be an item of concern for FY25 and moving forward.
- Built in 50% of the total anticipated costs of the new licensing system and anticipate the build of the system will go into FY26.

### Assessments on Licensees

#### Gaming Control Fund Assessment:

Chapter 23K §56 (a)-(c) defines how the MGC will fund its annual costs related to regulating gaming activities. This chapter was further defined through 205 CMR 121.00. Section 56 (a) requires that the Commission assess a \$600 per machine fee to each licensee for every slot machine approved to be used in the facility on July 1. Staff would then combine the slot fees with any other fees we were projecting to generate in the fiscal year (primarily licensing fees) to determine the total fee revenue for the Gaming Control Fund. Section 56 (c) directs the Commission to determine the difference between the projected budget and the projected fees and assess that difference on licensees in proportion to each licensee's share of the total gaming positions.

The finance staff is currently working with licensees to determine the anticipated number of gaming positions on July 1, 2024. Any adjustments for actual slot machine and gaming position counts will be updated in staff's first FY25 quarterly update to the Commission. After accounting for anticipated revenues from licensing fees and the annual slot fee, we are projecting an assessment of \$36.13M. The tables below represent estimates based on the information as of 5/28/2024.

Slot Fee and Gaming Positions						
Licensee	Slot Machines	Table Games	Table Gaming Positions	Total Gaming Positions	Percentage of Gaming Positions	FY25 Slot Fee
MGM	1,555	63	401	1,956	28.68%	\$933,000.00
Encore	2,556	209	1,326	3,882	56.93%	\$1,533,600.00
Penn	952			981	14.39%	\$571,200.00
TOTAL	5,063	272	1,727	6,819	100.00%	\$3,037,800.00



Massachusetts Gaming Commission

Licensee	Percentage of Gaming Positions	Licensee's Allocation of Assessment
MGM	28.68%	10,364,654.04
EBH	56.93%	20,570,341.00
PPC	14.39%	5,198,223.73
TOTAL	100.00%	36,133,218.77

Public Health Trust Fund Assessment from Gaming Operators:

C. 23K Section 56 (e) requires the Commission to annually assess a minimum of \$5M on licensees to be deposited into the Public Health Trust Fund, in the same proportion as the annual assessment for the Gaming Control Fund. The table below demonstrates each licensee's share of the assessment based on gaming positions as of 5/28/2024.

Licensee	Percentage of Gaming Positions	PHTF Allocation of Assessment
MGM	28.68%	1,434,227.89
EBH	56.93%	2,846,458.42
PPC	14.39%	719,313.68
TOTAL	100.00%	5,000,000.00

Sports Wagering Control Fund Assessment:

205 CMR 221.00 describes how the Commission shall assess its operational costs on Sports Wagering licensees, including any increases or decreases that are the result of over or under-spending. 205 CMR 221.01, paragraph 4(a) specifically states:

- (a) An Annual Assessment as provided by M.G.L. c. 23N, § 15(c), to be determined by the Commission and calculated in accordance with M.G.L. c. 23N, § 15(c) to cover costs of the Commission necessary to maintain control over Sports Wagering, in proportion to each licensee's actual or projected Adjusted Gross Sports Wagering receipts; provided, however, that such assessment may be adjusted by the Commission at any time after payment is made where required to reflect the actual Adjusted Gross Sports Wagering Receipts, and accordingly, the payment of additional funds may be required or a credit may be issued towards the payment due the following year;

For the purposes of the FY25 assessment, we recommend using the actual adjusted gross wagering receipt (AGSWR) figures of licensees from July 1, 2023 to the end of May 2024. This will allow the Commission to assess costs and begin regulating sports wagering in FY25, and then revise for actual performance through June 30th (the end of the state fiscal year) when staff provides its first FY25 quarterly update to the Commission.

We are estimating spending of \$11.10M and revenue from fees of \$450K, which would result in an assessment of \$10.65M to be divided between the sports wagering licensees. The table below shows each operator's Adjusted Gross Sports Wagering Receipts for 7/1/23 through 5/31/23 and their share of the FY25 assessment. Similar to FY24, we are assessing Bally's at the lowest percentage of category 3 licensees.



Massachusetts Gaming Commission

APPLICANT	FY24 Adjusted Gross SW Revenue thru 5/31	Assessment % based on FY24 AGSWR	Assessment
<b>Bally's</b>	\$0.00	1.867%	\$198,958.19
<b>Espn/PSI</b>	\$34,393,159.79	6.301%	\$671,327.38
<b>BetMGM</b>	\$17,316,673.15	3.172%	\$338,007.82
<b>Caesars - AWI</b>	\$10,706,310.51	1.961%	\$208,978.74
<b>DraftKings-Crown MA</b>	\$284,297,322.02	52.082%	\$5,549,259.74
<b>Fanatics-FBG</b>	\$10,095,955.89	1.867%	\$198,958.20
<b>FanDuel-Betfair</b>	\$172,094,620.05	31.527%	\$3,359,151.39
EBH SB	\$3,631,718.00	0.665%	\$70,888.27
MGM SB	\$264,135.81	0.048%	\$5,155.72
PPC SB	\$2,775,772.53	0.509%	\$54,180.89
<b>TOTAL</b>	<b>\$535,575,667.75</b>	<b>100.000%</b>	<b>\$10,654,866.35</b>

Public Health Trust Fund Assessment from Sports Wagering Operators:

C. 23N Section 15(e) requires the Commission to annually assess \$1M on sports wagering to be deposited into the Public Health Trust Fund. This \$1M fee is to be distributed proportionately across all sports wagering licensees who are not issued a category 1 sports wagering license. 205 CMR 221.01, paragraph 4(b) specifically states:

- (a) An annual fee, as provided by M.G.L. c. 23N, § 15(e) reflecting each Operator that is not a Category 1 Sports Wagering Licensee's share of \$1,000,000 to be deposited into the Public Health Trust Fund; provided, however, that the Commission shall determine each Operator's share as their proportional share of anticipated or actual Adjusted Gross Sports Wagering Receipts; provided further, however, that such assessment may be adjusted by the Commission at any time after payment is made where required to reflect the actual adjusted gross sports wagering revenue;

Based on the above regulatory requirements, as well as our recommendation for the annual assessment to the Sports Wagering Control Fund, we will use the licensees' AGSWR from July 1, 2023 through May 31, 2024 to determine each licensee's proportional share of the annual \$1M deposit to the Public Health Trust Fund. This assessment will be distributed across the licensees who are not category 1 sports wagering license holders. The table below shows each sports wagering operator's share of the assessment.



Massachusetts Gaming Commission

APPLICANT		PHTF %	PHTF Assessment
<b>Bally's</b>	\$0.00	1.891%	\$ 18,906.26
<b>ESPN - PSI</b>	\$34,393,159.79	6.379%	\$ 63,785.95
<b>BetMGM</b>	\$17,316,673.15	3.212%	\$ 32,115.70
<b>Caesars - AWI</b>	\$10,706,310.51	1.986%	\$ 19,856.05
<b>DraftKings-Crown MA</b>	\$284,297,322.02	52.726%	\$ 527,261.10
<b>Fanatics-FBG</b>	\$10,095,955.89	1.891%	\$ 18,906.26
<b>FanDuel-Betfair</b>	\$172,094,620.05	31.917%	\$ 319,168.67
<b>TOTAL</b>	\$528,904,041.41	100.00%	\$ 1,000,000.00

### Conclusion

On June 4, 2024 we presented our initial budget proposal to the Commission. We proposed an FY25 Gaming Control Fund budget of \$39.87M, a Research and Responsible Gaming budget funded from the Public Health Trust Fund of \$5.96M, a Community Mitigation Fund administration and oversight budget of \$483.42K, a Sports Wagering Control Fund budget of \$11.10M and Racing Oversight and Development Fund budget of \$2.12M. We are recommending an assessment of \$36.13M for the Gaming Control Fund as well as an assessment of \$5M to the Public Health Trust Fund to be paid by Gaming Licensees. We are recommending an assessment of \$10.65M for the Sports Wagering Control Fund and an additional \$1M assessment for the Public Health Trust Fund to be paid by Sports Wagering Licensees. We put the budget out for public comment. We are requesting approval of the budget as discussed in this memorandum and in today's public meeting.

#### Attachments:

Attachment A: FY25 Listing of Accounts Spending and Revenue

Attachment B: Next Year Budget All Departments for Commission

Attachment C: Next Year Budget by Object Class for Commission



Massachusetts Gaming Commission

Attachment A FY25 Listing of Accounts Spending and Revenue

2025		Budget Projections
Row Labels		Initial Projection
<b>10500001--Gaming Control Fund</b>		
<b>MGC Regulatory Cost</b>		
AA REGULAR EMPLOYEE COMPENSATION	\$	8,737,689.97
BB REGULAR EMPLOYEE RELATED EXPEN	\$	95,994.50
CC SPECIAL EMPLOYEES	\$	192,640.00
DD PENSION & INSURANCE RELATED EX	\$	3,828,205.39
EE ADMINISTRATIVE EXPENSES	\$	708,291.92
FF PROGRAM, FACILITY, OPERATIONAL SUPPIES	\$	20,000.00
GG ENERGY COSTS AND SPACE RENTAL	\$	817,235.42
HH CONSULTANT SVCS (TO DEPTS)	\$	988,500.00
JJ OPERATIONAL SERVICES	\$	12,770,229.07
KK Equipment Purchase	\$	62,000.00
LL EQUIPMENT LEASE-MAINTAIN/REPAR	\$	65,607.90
NN NON-MAJOR FACILITY MAINTENANCE REPAIR	\$	30,000.00
PP STATE AID/POL SUB/OSD	\$	90,000.00
TT PAYMENTS & REFUNDS	\$	-
UU IT Non-Payroll Expenses	\$	4,725,628.83
<b>MGC Regulatory Cost Subtotal:</b>	<b>\$</b>	<b>33,132,023.00</b>
<b>EE--Indirect Costs</b>	<b>\$</b>	<b>2,668,901.53</b>
<b>Office of Attorney General</b>		
ISA to AGO	\$	2,927,384.00
TT Reimbursement for AGO 0810-1024	\$	-
AGO State Police	\$	1,070,710.24
<b>Office of Attorney General Subtotal:</b>	<b>\$</b>	<b>3,998,094.24</b>
<b>ISA to ABCC</b>	<b>\$</b>	<b>75,000.00</b>
<b>Gaming Control Fund Total Costs</b>	<b>\$</b>	<b>39,874,018.77</b>
<b>Revenue Projections</b>		
Revenues		Initial Projection
Gaming Control Fund Beginning Balance 0500	\$	-
EBH Security fees 0500/Independent Monitor	\$	-
ENHANCED EBH Security fees	\$	100,000.00
Category/Region Collection Fees 0500	\$	-
Prior Year Independent Monitory Fees 500	\$	-
<b>IEB background / investigative collections 0500</b>	<b>\$</b>	<b>150,000.00</b>
Phase 1 Refunds 0500	\$	-
Phase 2 Category 1 Collections (restricted) 0500	\$	-
Region C Phase 1 Investigation Collections 0500	\$	-
Region C Phase 2 Category 1 Collections 0500	\$	-
Grant Collections (restricted) 0500	\$	-

Attachment A FY25 Listing of Accounts Spending and Revenue

Region A slot Machine Fee 0500	\$	1,533,600.00
Region B Slot Machine Fee 0500	\$	933,000.00
Slots Parlor Slot Machine Fee 0500	\$	571,200.00
Gaming Employee License Fees (GEL) 3000	\$	180,000.00
Key Gaming Executive (GKE) 3000	\$	10,000.00
Key Gaming Employee (GKS) 3000	\$	75,000.00
Non-Gaming Vendor (NGV) 3000	\$	50,000.00
Vendor Gaming Primary (VGP) 3000	\$	30,000.00
Vendor Gaming Secondary (VGS) 3000	\$	-
Gaming School License (GSB)/LIQ	\$	-
Gaming Service Employee License (SER) 3000	\$	75,000.00
Subcontractor ID Initial License (SUB) 3000	\$	15,000.00
Temporary License Initial License (TEM) 3000	\$	10,000.00
Assessment for PHTF	\$	5,000,000.00
Transfer PHTF Assessment to PHTF	\$	(5,000,000.00)
Veterans Initial License (VET) 3000	\$	-
Transfer of Licensing Fees to CMF 0500	\$	-
Assessment 0500	\$	36,133,218.77
Misc/MCC Grant	\$	-
Miscellaneous 0500	\$	5,000.00
Bank Interest 2700	\$	3,000.00
<b>Grand Total</b>	<b>\$</b>	<b>39,874,018.77</b>

2025	Budget Projections	
Row Labels	Initial Projection	
<b>4000-1101 Research and Responsible Gaming/Public Health Trust Fund</b>		
AA REGULAR EMPLOYEE COMPENSATION	\$	334,980.49
BB REGULAR EMPLOYEE RELATED EXPEN	\$	7,250.00
CC SPECIAL EMPLOYEES	\$	-
DD PENSION & INSURANCE RELATED EX	\$	146,466.23
EE ADMINISTRATIVE EXPENSES	\$	420,902.90
FF PROGRAMMATIC FACILITY OPERATONAL SUPPLIES	\$	1,000.00
HH CONSULTANT SVCS (TO DEPTS)	\$	3,655,000.00
JJ OPERATIONAL SERVICES	\$	15,000.00
MM PURCHASED CLIENT/PROGRAM SVCS	\$	-
PP STATE AID/POL SUB	\$	1,320,000.00
UU IT Non-Payroll Expenses	\$	-
ISA to DPH	\$	-
<b>Research and Responsible Gaming/Public Health Trust</b>		
<b>Fund Subtotal:</b>	<b>\$</b>	<b>5,900,599.62</b>

**Revenue Projections**

Attachment A FY25 Listing of Accounts Spending and Revenue

Revenues		Initial Projection
Public Health Trust Fund ISA		\$ 6,000,000.00

Budget Projections	
Row Labels	Initial Projection
<b>1050003</b>	
AA REGULAR EMPLOYEE COMPENSATION	\$ 611,888.13
BB REGULAR EMPLOYEE RELATED EXPEN	\$ 6,000.00
CC SPECIAL EMPLOYEES	\$ 487,240.00
DD PENSION & INSURANCE RELATED EX	\$ 306,251.90
EE ADMINISTRATIVE EXPENSES	\$ 27,060.00
FF PROGRAMMATIC FACILITY OPERATONAL SUPPLIES	\$ 12,000.00
HH CONSULTANT SVCS (TO DEPTS)	\$ 10,000.00
JJ OPERATIONAL SERVICES	\$ 391,000.00
KK EQUIPMENT PURCHASES	\$ -
LL EQUIPMENT LEASE-MAINTAIN/REPAR	\$ 915.00
MM PURCHASED CLIENT/PROGRAM SVCS	\$ 85,000.00
NN INFRASTRUCTURE:	\$ -
TT LOANS AND SPECIAL PAYMENTS	\$ -
UU IT Non-Payroll Expenses	\$ 4,000.00
EE --Indirect Costs	\$ 111,802.56
ISA to DPH	\$ 70,000.00
<b>Grand Total</b>	<b>\$ 2,123,157.59</b>

Revenue Projections	
Revenues	Initial Projection
Racing Oversight and Development Balance Forward	
0131	\$ -
Plainridge Assessment 4800	\$ 60,000.00
Plainridge Daily License Fee 3003	\$ 109,500.00
Plainridge Occupational License 3003/3004	\$ 50,000.00
Plainridge Racing Development Oversight Live 0131	\$ 25,000.00
Plainridge Racing Development Oversight Simulcast 0131	\$ 100,000.00
Raynham Assessment 4800	\$ 55,000.00
Raynham Daily License Fee 3003	\$ 92,700.00
Raynham Racing Development Oversight Simulcast 0131	\$ 75,000.00
Suffolk Assessment 4800	\$ 640,000.00
Suffolk Commission Racing Development Oversight Simulcast 0131	\$ 20,000.00
Suffolk Daily License Fee 3003	\$ 72,600.00
Suffolk Occupational License 3003/3004	\$ -
Suffolk Racing Development Oversight Live 0131	\$ -
Suffolk TVG Commission Live 0131	\$ -
Suffolk TVG Commission Simulcast 0131	\$ 420,000.00



Attachment A FY25 Listing of Accounts Spending and Revenue

Suffolk Twin Spires Commission Live 0131	\$	-
Suffolk Twin Spires Commission Simulcast 0131	\$	200,000.00
Suffolk Xpress Bet Commission Live 0131	\$	-
Suffolk Xpress Bet Commission Simulcast 0131	\$	50,000.00
Suffolk NYRA Bet Commission Live 0131	\$	-
Suffolk NYRA Bet Commission Simulcast 0131	\$	100,000.00
Transfer to General Fund 10500140 0000	\$	-
Wonderland Assessment 4800	\$	-
Wonderland Daily License Fee 3003	\$	-
Wonderland Racing Development Oversight Simulcast 0131	\$	2,000.00
Plainridge fine 2700	\$	25,000.00
Suffolk Fine 2700	\$	-
Plainridge Unclaimed wagers 5009	\$	-
Suffolk Unclaimed wagers 5009	\$	-
Raynham Unclaimed wagers 5009	\$	-
Wonderland Unclaimed wagers 5009	\$	-
Return of Unclaimed wagers	\$	-
Misc/Bank Interest 0131	\$	750.00
<b>Grand Total</b>	<b>\$</b>	<b>2,097,550.00</b>

Row Labels	Budget Projections	
	Initial Projection	
<b>10500004</b>		
AA REGULAR EMPLOYEE COMPENSATION	\$	294,181.02
BB REGULAR EMPLOYEE RELATED EXPEN	\$	5,000.00
DD PENSION & INSURANCE RELATED EX	\$	131,735.34
EE ADMINISTRATIVE EXPENSES	\$	2,500.00
GG ENERGY COSTS AND SPACE RENTAL	\$	-
HH CONSULTANT SVCS (Grant)	\$	-
UU IT Non-Payroll Expenses	\$	50,000.00
<b>Grand Total</b>	<b>\$</b>	<b>483,416.36</b>

Row Labels	Budget Projections	
	Initial Projection	
<b>10501384</b>		
AA REGULAR EMPLOYEE COMPENSATION	\$	4,532,647.42
BB REGULAR EMPLOYEE RELATED EXPEN	\$	18,500.00
CC SPECIAL EMPLOYEES	\$	154,000.00
DD PENSION & INSURANCE RELATED EX	\$	2,009,898.03
EE ADMINISTRATIVE EXPENSES	\$	92,350.00
FF PROGRAMMATIC FACILITY OPERATONAL SUPPLIES	\$	-
GG ENERGY COSTS AND SPACE RENTAL	\$	311,353.26
HH CONSULTANT SVCS (TO DEPTS)	\$	1,462,214.29
JJ OPERATIONAL SERVICES	\$	461,595.28
KK EQUIPMENT PURCHASES	\$	-

Attachment A FY25 Listing of Accounts Spending and Revenue

LL EQUIPMENT LEASE-MAINTAIN/REPAR	\$	-
NN INFRASTRUCTURE:	\$	-
OO--ISA AGO	\$	500,000.00
TT LOANS AND SPECIAL PAYMENTS	\$	-
UU IT Non-Payroll Expenses	\$	1,041,951.94
EE --Indirect Costs	\$	520,356.13
<b>Grand Total</b>	<b>\$</b>	<b>11,104,866.35</b>
		<b>Revenue Projections</b>
	<b>Revenues</b>	<b>Initial Projection</b>
BALANCE FORWARD PRIOR YEAR	\$	-
CATERGORY 1	\$	-
CATERGORY 2	\$	-
CATEROGRY 3 (TETHERED)	\$	-
CATERGORY 3 (UNTETHERED)	\$	-
SW GAMING CONTROL FUND BALANCE 0500	\$	-
EMPLOYEE LICENSING FEES 3000	\$	200,000.00
VENDOR SW FEES 3000	\$	100,000.00
FANTASY FEES 3000	\$	-
ASSESSMENT 0500	\$	10,654,866.35
FINES & PENALTIES 2700	\$	-
MISC 0500	\$	50,000.00
IEB BACKGROUND/INVESTIGATIVE FEES 3000	\$	95,000.00
BANK INTEREST SW	\$	5,000.00
<b>Grand Total</b>		<b>\$11,104,866.35</b>

# Attachment B: Next Year Budget All Departments for Commission

Approp	Budget Grouping	Division/ Bureau	Object Class	Object_name	Item Short Name	New Description	Current Year Amount	Next Year Amount	Variance	Percent Change
10500001	Mass. Gaming Commission									
	MGC Regulatory Costs									
		1000	Finance and Administration							
		AA	REGULAR EMPLOYEE COMPENSATION							
		A01	Salaries: Inclusive		Employee Compensation	Employee Salaries	\$493,065.26	\$536,457.62	\$43,392.36	8.80%
			<b>Obj Class Totals:</b>				<b>\$493,065.26</b>	<b>\$536,457.62</b>	<b>\$43,392.36</b>	<b>8.80%</b>
		BB	REGULAR EMPLOYEE RELATED EXPEN							
		B01	Other Out Of State Travel - INCLUSIVE: AIRFARE, HOTEL, LODGI		Travel	Out of State Travel	\$3,000.00	\$3,000.00	\$0.00	0.00%
		B02	In-State Travel		Travel	In-State Travel	\$3,000.00	\$3,000.00	\$0.00	0.00%
			<b>Obj Class Totals:</b>				<b>\$6,000.00</b>	<b>\$6,000.00</b>	<b>\$0.00</b>	<b>0.00%</b>
		DD	PENSION & INSURANCE RELATED EX							
		D09	Fringe Benefit Cost Recoupment		Fringe	Fringe rate of 43.36%	\$214,286.16	\$232,608.03	\$18,321.87	8.55%
					Taxes	Tax rate of 2.45%	\$12,080.10	\$13,143.21	\$1,063.11	8.80%
			<b>Obj Class Totals:</b>				<b>\$226,366.26</b>	<b>\$245,751.24</b>	<b>\$19,384.98</b>	<b>8.56%</b>
		EE	ADMINISTRATIVE EXPENSES							
		E01	Office & Administrative Supplies		Supplies	Adoni Spring Water/Milhench	\$4,000.00	\$4,000.00	\$0.00	0.00%
					Supplies	Cam Office Supplies Increased \$2,500	\$9,500.00	\$12,000.00	\$2,500.00	26.32%
					Supplies	W.B. Mason/Veteran's Business Supply	\$40,000.00	\$40,000.00	\$0.00	0.00%
		E02	Printing Expenses & Supplies		Printing	Millenium/RazzMTazz/MG Products	\$2,500.00	\$2,500.00	\$0.00	0.00%
		E05	Postage Chargeback		Postage	ITD PAD Chargeback for postal Services	\$2,743.92	\$2,743.92	\$0.00	0.00%
		E06	Postage		Postage	Postage for Ashburton Mail Room	\$2,400.00	\$2,400.00	\$0.00	0.00%
					Postage	Postage for Pitney Bowes, Fed Ex, UPS	\$3,000.00	\$3,000.00	\$0.00	0.00%
		E15	Bottled Water		Water	Quench	\$1,500.00	\$1,500.00	\$0.00	0.00%
		E18	State Single Audit Chargeback		Chargeback	Chargeback Single State Audit	\$500.00	\$500.00	\$0.00	0.00%
		E19	Fees, Fines, Licenses, Permits & Chargebacks		Fees, Fines, Licensed, Chargebakcs	EZ Pass/Occupancy/Commissions	\$1,700.00	\$1,700.00	\$0.00	0.00%
		E22	Temp Use Space/Confer-Incidental Includes Reservation Fees		Laz Parking/VPNE	Parking at 33 Arch St.	\$54,000.00	\$54,000.00	\$0.00	0.00%
		E30	Credit Card Purchases		Credit Card	Credit Card Incidental Purchases	\$2,000.00	\$2,000.00	\$0.00	0.00%
		E41	Out Of State Travel Expen on Behalf of State Employ		Travel	Travel Agency Fees	\$2,500.00	\$2,500.00	\$0.00	0.00%
		EE2	Conference, Training and Registration Fees		Conference Registrations	Registration Fees	\$1,125.00	\$1,125.00	\$0.00	0.00%
			<b>Obj Class Totals:</b>				<b>\$127,468.92</b>	<b>\$129,968.92</b>	<b>\$2,500.00</b>	<b>1.96%</b>
		GG	ENERGY COSTS AND SPACE RENTAL							

Approp	Budget Grouping	Division/ Bureau	Object Class	Object_name	Item Short Name	New Description	Current Year Amount	Next Year Amount	Variance	Percent Change
10500001	Mass. Gaming Commission									
	MGC Regulatory Costs									
		1000	Finance and Administration							
		G01	Space Rental		Office Lease	101 Federal St. First 6 months \$677,728.64 old lease costs, second 6 months at discount for first year of renewal \$654,850.20, 3 months of old lease for free for renewing 5 years (\$333,864.32). Total FY 25 Lease costs \$988,714.52. 70% to Gaming--\$692,1	\$949,257.12	\$692,100.16	(\$257,156.96)	-27.09%
		G03	Electricity		Electricity	101 Federal St. 12 months	\$23,334.34	\$23,334.34	\$0.00	0.00%
		G05	Fuel For Vehicles		Gas	Wex Bank/Gulf	\$3,000.00	\$3,000.00	\$0.00	0.00%
			<b>Obj Class Totals:</b>				<b>\$975,591.46</b>	<b>\$718,434.50</b>	<b>(\$257,156.96)</b>	<b>-26.36%</b>
		HH	<i>CONSULTANT SVCS (TO DEPTS)</i>							
		H09	Attorneys/Legal Services		Insurance	Comprehensive Insurance Policy	\$163,500.00	\$163,500.00	\$0.00	0.00%
		H19	Management Consultants		Outside Consultant	CPA Firm for Annual Audits consistent with Generally Accepted Auditing Standards	\$70,000.00	\$70,000.00	\$0.00	0.00%
			<b>Obj Class Totals:</b>				<b>\$233,500.00</b>	<b>\$233,500.00</b>	<b>\$0.00</b>	<b>0.00%</b>
		JJ	<i>OPERATIONAL SERVICES</i>							
		J10	Auxiliary Financial Services		Auxiliary Financial Services	Credit Card Fees/BillMatrix	\$200.00	\$200.00	\$0.00	0.00%
		JJ2	Auxiliary Services		Courier	USA Couriers	\$300.00	\$300.00	\$0.00	0.00%
					Shredding	ProShred	\$1,615.00	\$1,615.00	\$0.00	0.00%
			<b>Obj Class Totals:</b>				<b>\$2,115.00</b>	<b>\$2,115.00</b>	<b>\$0.00</b>	<b>0.00%</b>
		LL	<i>EQUIPMENT LEASE-MAINTAIN/REPAR</i>							
		L24	Motorized Vehicle Equipment Rental or Lease		Rental Cars	Enterprise Car Rental	\$500.00	\$500.00	\$0.00	0.00%
		L25	Office Equipment Rental or Lease		Printing	Pitney Bowes	\$607.90	\$607.90	\$0.00	0.00%
		L26	Printing/Photocopy & Micrographics Equip Rent/Lease		Copier	Canon Financial Services Increase @\$1,900 Recurring Payments for 13th floor and IEB Per Click costs of \$2.5K	\$10,100.00	\$12,000.00	\$1,900.00	18.81%
		L46	Print, Photocopying & Micrograph Equipment Maint/Repair		Copier	Canon USA/Maintenance & Repair--Initial Contract Rate Ended	\$5,000.00	\$5,000.00	\$0.00	0.00%
					Xerox Leases	6 Machines average \$300 per month Xerox Leases Recurring Payments of \$11.1K for 3 machines Per Click costs of \$3.2K (avg of this year) Increase \$400	\$21,600.00	\$22,000.00	\$400.00	1.85%
			<b>Obj Class Totals:</b>				<b>\$37,807.90</b>	<b>\$40,107.90</b>	<b>\$2,300.00</b>	<b>6.08%</b>
		NN	<i>INFRASTRUCTURE:</i>							
		N50	Non-Major Facility Infrastructure Maintenance and Repair		Repairs	Office/Building Repairs	\$5,000.00	\$5,000.00	\$0.00	0.00%
			<b>Obj Class Totals:</b>				<b>\$5,000.00</b>	<b>\$5,000.00</b>	<b>\$0.00</b>	<b>0.00%</b>
		UU	<i>IT Non-Payroll Expenses</i>							

Approp	Budget Grouping	Division/ Bureau	Object Class	Object_name	Item Short Name	New Description	Current Year Amount	Next Year Amount	Variance	Percent Change
10500001	Mass. Gaming Commission									
	MGC Regulatory Costs									
		1000	Finance and Administration							
		U03	Software & Information Technology Licenses (IT)	Software	Software	Software - LinkSquares CLM	\$35,750.00	\$35,750.00	\$0.00	0.00%
		U05	Information Technology (IT) Temp Staff Augmentation Profs	IT Consultants	IT Consultants	Diversity Consultants	\$25,000.00	\$25,000.00	\$0.00	0.00%
					IT Consultants	Web penetration Testing	\$8,000.00	\$8,000.00	\$0.00	0.00%
		U10	Information Tech (IT) Equipment Maintenance & Repair	Cable	Cable	Cable/Comcast	\$5,500.00	\$5,500.00	\$0.00	0.00%
			<b>Obj Class Totals:</b>				<b>\$74,250.00</b>	<b>\$74,250.00</b>	<b>\$0.00</b>	<b>0.00%</b>
			<b>Division/Bureau Totals:</b>				<b>\$2,181,164.80</b>	<b>\$1,991,585.18</b>	<b>(\$189,579.62)</b>	<b>-8.69%</b>
		1100	Human Resources							
		AA	REGULAR EMPLOYEE COMPENSATION							
		A01	Salaries: Inclusive	Employee Compensation	Employee	Employee Salaries	\$411,669.92	\$416,703.07	\$5,033.15	1.22%
				Merit Increases		Intern Program that Could Provide Up to 2 regular and 1 graduate intern	\$0.00	\$87,500.00	\$87,500.00	#Div/0!
				Raises		3% COLA/Incentives/Equity Agency Wide	\$373,232.00	\$281,184.27	(\$92,047.73)	-24.66%
			<b>Obj Class Totals:</b>				<b>\$784,901.92</b>	<b>\$785,387.34</b>	<b>\$485.42</b>	<b>0.06%</b>
		BB	REGULAR EMPLOYEE RELATED EXPEN							
		B01	Other Out Of State Travel - INCLUSIVE: AIRFARE, HOTEL, LODGI	Travel	Travel	Other Out of State Travel-Inclusive Airfare, Hotel, Lodging Gaming Conference	\$500.00	\$500.00	\$0.00	0.00%
		B02	In-State Travel	Travel	Travel	In-state Travel AOC as well as site visits of licensees	\$5,985.00	\$5,985.00	\$0.00	0.00%
			<b>Obj Class Totals:</b>				<b>\$6,485.00</b>	<b>\$6,485.00</b>	<b>\$0.00</b>	<b>0.00%</b>
		CC	SPECIAL EMPLOYEES							
		C23	Management, Business Professionals & Admin Services	Contract Employee	Contract Employee	Administrative Help	\$52,000.00	\$62,640.00	\$10,640.00	20.46%
			<b>Obj Class Totals:</b>				<b>\$52,000.00</b>	<b>\$62,640.00</b>	<b>\$10,640.00</b>	<b>20.46%</b>
		DD	PENSION & INSURANCE RELATED EX							
		D09	Fringe Benefit Cost Recoupment	Fringe	Fringe	Fringe rate of 43.36%	\$178,911.75	\$162,348.98	(\$16,562.77)	-9.26%
				Taxes		Tax rate of 2.45%	\$10,085.91	\$10,209.23	\$123.32	1.22%
		D15	Workers' Compensation Chargebacks	Worker's Comp Chargeback	Worker's Comp Chargeback	Worker's Comp Chargeback	\$5,000.00	\$10,000.00	\$5,000.00	100.00%
			<b>Obj Class Totals:</b>				<b>\$193,997.66</b>	<b>\$182,558.21</b>	<b>(\$11,439.45)</b>	<b>-5.90%</b>
		EE	ADMINISTRATIVE EXPENSES							
		E02	Printing Expenses & Supplies	Printing	Printing	Printing of Reports and Best Practices	\$5,000.00	\$5,000.00	\$0.00	0.00%
		E12	Subscriptions, Memberships & Licensing Fees	Administrative Expenses	Administrative Expenses	Marketing Sponsorships of Diversity and Opportunity Events GNEMSCD, UMASS, Circa	\$15,000.00	\$15,000.00	\$0.00	0.00%

Approp	Budget Grouping	Division/ Bureau	Object Class	Object_name	Item Short Name	New Description	Current Year Amount	Next Year Amount	Variance	Percent Change
10500001	Mass. Gaming Commission			MGC Regulatory Costs						
		1100	Human Resources							
		E12	Subscriptions, Memberships & Licensing Fees	Subscriptions	Human Resource Information System		\$5,000.00	\$5,000.00	\$0.00	0.00%
				Subscriptions	Subscriptions, Memberships & Licensing Fees SHRM, NEHRA, The Partnership		\$20,000.00	\$20,000.00	\$0.00	0.00%
		E19	Fees, Fines, Licenses, Permits & Chargebacks	Licenses	Fees, Fines, Licenses, Permits & Chargebacks for HRCMS and HRD		\$9,000.00	\$9,000.00	\$0.00	0.00%
		E22	Temp Use Space/Confer-Incidental Includes Reservation Fees	Conference Incidentals	Conference Incidentals		\$5,000.00	\$5,000.00	\$0.00	0.00%
				Conferences	Workforce/Diversity Meetings--Digital also		\$7,000.00	\$7,000.00	\$0.00	0.00%
		E30	Credit Card Purchases	Credit Card Charges	FIA Card		\$3,000.00	\$3,000.00	\$0.00	0.00%
		E41	Out Of State Travel Expen on Behalf of State Employ	Travel	Travel Agent		\$1,000.00	\$1,000.00	\$0.00	0.00%
		EE2	Conference, Training and Registration Fees	Conference, Training Registration Fees	GNEMSDC, Umass, Diversity Conferences		\$5,500.00	\$5,500.00	\$0.00	0.00%
				Training	Conference, Training and Registration Fees		\$500.00	\$500.00	\$0.00	0.00%
		EE9	Employee Recognition Chargeback	Employee Morale	Employee Recognition Program		\$5,000.00	\$5,000.00	\$0.00	0.00%
				<b>Obj Class Totals:</b>			<b>\$81,000.00</b>	<b>\$81,000.00</b>	<b>\$0.00</b>	<b>0.00%</b>
		HH	CONSULTANT SVCS (TO DEPTS)							
		H09	Attorneys/Legal Services	Legal Consultants	Employment Lawyers		\$5,000.00	\$5,000.00	\$0.00	0.00%
				Worker's Comp	Workers Comp Litigation Fees		\$5,000.00	\$5,000.00	\$0.00	0.00%
		H23	Program Coordinators	Consultants	Diversity Equity and Inclusion RFR or SWC Increased Shifted \$60,000 from LEAF Grant		\$50,000.00	\$110,000.00	\$60,000.00	120.00%
				Strategic Consultant	Strategic Organizational Consult and Compensation		\$0.00	\$0.00	\$0.00	#Num!
				<b>Obj Class Totals:</b>			<b>\$60,000.00</b>	<b>\$120,000.00</b>	<b>\$60,000.00</b>	<b>100.00%</b>
		JJ	OPERATIONAL SERVICES							
		J46	Temporary Help Services	Temp Help	Temp help/interns/diversity		\$75,000.00	\$75,000.00	\$0.00	0.00%
		JJ2	Auxiliary Services	HR Investigations	HR Investigations		\$10,000.00	\$10,000.00	\$0.00	0.00%
				Testing	Workcare Health Resouces		\$3,000.00	\$3,000.00	\$0.00	0.00%
				<b>Obj Class Totals:</b>			<b>\$88,000.00</b>	<b>\$88,000.00</b>	<b>\$0.00</b>	<b>0.00%</b>
		PP	STATE AID/POL SUB							
		P01	Grants To Public Entities	Grants	Worforce Development and Diversity Grants Reduced \$60,000 moved to H23		\$150,000.00	\$90,000.00	(\$60,000.00)	-40.00%
				<b>Obj Class Totals:</b>			<b>\$150,000.00</b>	<b>\$90,000.00</b>	<b>(\$60,000.00)</b>	<b>-40.00%</b>
		UU	IT Non-Payroll Expenses							
		U03	Software & Information Technology Licenses (IT)	Software	Cornerstone HR Employee Performance Review Software Increased to \$16,275		\$10,725.00	\$27,000.00	\$16,275.00	151.75%
				<b>Obj Class Totals:</b>			<b>\$10,725.00</b>	<b>\$27,000.00</b>	<b>\$16,275.00</b>	<b>151.75%</b>

Approp	Budget Grouping	Division/Bureau	Object Class	Object_name	Item Short Name	New Description	Current Year Amount	Next Year Amount	Variance	Percent Change
10500001	Mass. Gaming Commission									
	MGC Regulatory Costs									
		1100	Human Resources							
		<b>Division/Bureau Totals:</b>					<b>\$1,427,109.58</b>	<b>\$1,443,070.55</b>	<b>\$15,960.97</b>	<b>1.12%</b>
		1200	Legal							
		AA	REGULAR EMPLOYEE COMPENSATION							
		A01	Salaries: Inclusive		Employee Compensation	Employee Salaries	\$585,339.16	\$640,612.40	\$55,273.24	9.44%
		<b>Obj Class Totals:</b>					<b>\$585,339.16</b>	<b>\$640,612.40</b>	<b>\$55,273.24</b>	<b>9.44%</b>
		BB	REGULAR EMPLOYEE RELATED EXPEN							
		B01	Other Out Of State Travel - INCLUSIVE: AIRFARE, HOTEL, LODGI		Travel	Out of State Travel and Training	\$6,250.00	\$6,250.00	\$0.00	0.00%
		B02	In-State Travel		Travel	In State Travel	\$2,400.00	\$2,400.00	\$0.00	0.00%
		B05	Conference, Training, Registration and Membership Dues and L		Professional Licenses	Professional and Bar Licenses	\$6,000.00	\$6,000.00	\$0.00	0.00%
		<b>Obj Class Totals:</b>					<b>\$14,650.00</b>	<b>\$14,650.00</b>	<b>\$0.00</b>	<b>0.00%</b>
		DD	PENSION & INSURANCE RELATED EX							
		D09	Fringe Benefit Cost Recoupment		Fringe	Fringe rate of 43.36%	\$199,794.49	\$277,769.54	\$77,975.05	39.03%
					Taxes	Tax rate of 2.45%	\$13,146.43	\$15,695.00	\$2,548.57	19.39%
		<b>Obj Class Totals:</b>					<b>\$212,940.93</b>	<b>\$293,464.54</b>	<b>\$80,523.61</b>	<b>37.81%</b>
		EE	ADMINISTRATIVE EXPENSES							
		E01	Office & Administrative Supplies		Supplies	Office Supplies	\$5,000.00	\$5,000.00	\$0.00	0.00%
		E12	Subscriptions, Memberships & Licensing Fees		Subscription	Legal Subscription - Law360	\$3,700.00	\$3,700.00	\$0.00	0.00%
					Subscriptions	Subscriptions and Memberships Westlaw ABA Increase \$4k for Thomson Reuters	\$15,000.00	\$19,000.00	\$4,000.00	26.67%
					Subscriptions	nstatrac Subscription	\$4,650.00	\$4,650.00	\$0.00	0.00%
		E13	Advertising Expenses		Reg Advertising	Advertising of Regs and Meetings Increase \$5k for Racing	\$10,000.00	\$15,000.00	\$5,000.00	50.00%
		E30	Credit Card Purchases		Credit Card	Credit Card Purchases	\$5,000.00	\$5,000.00	\$0.00	0.00%
		E41	Out Of State Travel Expen on Behalf of State Employ		Conference, Training, Registration Fees	Conference, Training, Registration Fees \$1,750 Increase for more conferences	\$6,250.00	\$8,000.00	\$1,750.00	28.00%
					Travel	Conference/Trainings Travel and Lodging for FTEs Increase \$2,500 for more travel	\$2,500.00	\$5,000.00	\$2,500.00	100.00%
		<b>Obj Class Totals:</b>					<b>\$52,100.00</b>	<b>\$65,350.00</b>	<b>\$13,250.00</b>	<b>25.43%</b>
		HH	CONSULTANT SVCS (TO DEPTS)							
		H09	Attorneys/Legal Services		Litigation Defense	Outside Counsel Litigation Defense	\$400,000.00	\$400,000.00	\$0.00	0.00%
					Outside Counsel	General Practice, Regulations, Laws, etc.	\$75,000.00	\$75,000.00	\$0.00	0.00%
					Outside Counsel	Increase for Consultation for New Union Initiative Labor Employment Law	\$50,000.00	\$50,000.00	\$0.00	0.00%

Approp	Budget Grouping	Division/Bureau	Object Class	Object_name	Item Short Name	New Description	Current Year Amount	Next Year Amount	Variance	Percent Change
10500001	Mass. Gaming Commission									
	MGC Regulatory Costs									
		1200	Legal							
			H19	Management Consultants	Hearing Officer	Hearing Officer Increased \$25,000 volume of cases	\$40,000.00	\$65,000.00	\$25,000.00	62.50%
				<b>Obj Class Totals:</b>			<b>\$565,000.00</b>	<b>\$590,000.00</b>	<b>\$25,000.00</b>	<b>4.42%</b>
			JJ	OPERATIONAL SERVICES						
			JJ1	Legal Support Services	Operational Services	Offsite Storage - \$50 per month charge if boxes are pulledIncreased GRM Usage Increased for more digitization of files	\$750.00	\$4,000.00	\$3,250.00	433.33%
				<b>Obj Class Totals:</b>			<b>\$750.00</b>	<b>\$4,000.00</b>	<b>\$3,250.00</b>	<b>433.33%</b>
				<b>Division/Bureau Totals:</b>			<b>\$1,430,780.09</b>	<b>\$1,608,076.94</b>	<b>\$177,296.85</b>	<b>12.39%</b>
		1300	Executive Director							
			AA	REGULAR EMPLOYEE COMPENSATION						
			A01	Salaries: Inclusive	Employee Compensation	Employee Salaries	\$384,127.12	\$375,463.96	(\$8,663.16)	-2.26%
				<b>Obj Class Totals:</b>			<b>\$384,127.12</b>	<b>\$375,463.96</b>	<b>(\$8,663.16)</b>	<b>-2.26%</b>
			BB	REGULAR EMPLOYEE RELATED EXPEN						
			B01	Other Out Of State Travel - INCLUSIVE: AIRFARE, HOTEL, LODGI	Travel	Conferences Out of State	\$4,500.00	\$4,500.00	\$0.00	0.00%
			B02	In-State Travel	Travel	In-State Mileage and Reimbursements	\$4,023.25	\$4,023.25	\$0.00	0.00%
				<b>Obj Class Totals:</b>			<b>\$8,523.25</b>	<b>\$8,523.25</b>	<b>\$0.00</b>	<b>0.00%</b>
			DD	PENSION & INSURANCE RELATED EX						
			D09	Fringe Benefit Cost Recoupment	Fringe	Fringe rate of 43.36%	\$136,037.28	\$162,801.17	\$26,763.89	19.67%
					Taxes	Tax rate of 2.45%	\$7,668.92	\$9,198.86	\$1,529.94	19.95%
				<b>Obj Class Totals:</b>			<b>\$143,706.20</b>	<b>\$172,000.03</b>	<b>\$28,293.83</b>	<b>19.69%</b>
			EE	ADMINISTRATIVE EXPENSES						
			E12	Subscriptions, Memberships & Licensing Fees	Memberships	NAGR increased \$300 for costs	\$500.00	\$800.00	\$300.00	60.00%
			E30	Credit Card Purchases	Credit Card	Credit Card Purchases	\$5,000.00	\$5,000.00	\$0.00	0.00%
			EE2	Conference, Training and Registration Fees	Travel and Conf	Conference, Training and Registration Fees	\$5,000.00	\$5,000.00	\$0.00	0.00%
				<b>Obj Class Totals:</b>			<b>\$10,500.00</b>	<b>\$10,800.00</b>	<b>\$300.00</b>	<b>2.86%</b>
			HH	CONSULTANT SVCS (TO DEPTS)						
			H19	Management Consultants	Strategic Consultant	General Consultant needs for Commissioners or Executive Director	\$10,000.00	\$10,000.00	\$0.00	0.00%
				<b>Obj Class Totals:</b>			<b>\$10,000.00</b>	<b>\$10,000.00</b>	<b>\$0.00</b>	<b>0.00%</b>
			JJ	OPERATIONAL SERVICES						
			J50	Instructors/Lecturers/Trainers	Training	Upper Management Training	\$5,000.00	\$5,000.00	\$0.00	0.00%
				<b>Obj Class Totals:</b>			<b>\$5,000.00</b>	<b>\$5,000.00</b>	<b>\$0.00</b>	<b>0.00%</b>
				<b>Division/Bureau Totals:</b>			<b>\$561,856.57</b>	<b>\$581,787.24</b>	<b>\$19,930.67</b>	<b>3.55%</b>
		1400	Information Technology							



Approp	Budget Grouping	Division/ Bureau	Object Class	Object_name	Item Short Name	New Description	Current Year Amount	Next Year Amount	Variance	Percent Change
10500001	Mass. Gaming Commission									
	MGC Regulatory Costs									
		1400	Information Technology							
		AA	REGULAR EMPLOYEE COMPENSATION							
		A01	Salaries: Inclusive		Employee Compensation	Employee Salaries	\$1,039,345.34	\$1,291,486.17	\$252,140.83	24.26%
			<b>Obj Class Totals:</b>				<b>\$1,039,345.34</b>	<b>\$1,291,486.17</b>	<b>\$252,140.83</b>	<b>24.26%</b>
		BB	REGULAR EMPLOYEE RELATED EXPEN							
		B01	Other Out Of State Travel - INCLUSIVE: AIRFARE, HOTEL, LODGI		Travel	Out of State Travel G2E/Gartner increase for more FTE by \$3,125	\$1,875.00	\$5,000.00	\$3,125.00	166.67%
		B02	In-State Travel		Travel	In-state travel increase for more FTEs by \$1,250	\$3,750.00	\$5,000.00	\$1,250.00	33.33%
			<b>Obj Class Totals:</b>				<b>\$5,625.00</b>	<b>\$10,000.00</b>	<b>\$4,375.00</b>	<b>77.78%</b>
		DD	PENSION & INSURANCE RELATED EX							
		D09	Fringe Benefit Cost Recoupment		Fringe	Fringe rate of 43.36%	\$451,635.26	\$559,988.40	\$108,353.14	23.99%
					Taxes	Tax rate of 2.45%	\$25,463.96	\$31,641.41	\$6,177.45	24.26%
			<b>Obj Class Totals:</b>				<b>\$477,099.22</b>	<b>\$591,629.81</b>	<b>\$114,530.59</b>	<b>24.01%</b>
		EE	ADMINISTRATIVE EXPENSES							
		E01	Office & Administrative Supplies		Supplies	Office and Administrative Supplies increase by \$1,500	\$300.00	\$1,800.00	\$1,500.00	500.00%
		E02	Printing Expenses & Supplies		Printers	Printers @\$250/printer Decrease by 300	\$300.00	\$0.00	(\$300.00)	-100.00%
		E12	Subscriptions, Memberships & Licensing Fees		Subscriptions	Pagefreezer, Gaming Compliance increase for more FTEs and subscription costs by \$10,214	\$18,676.00	\$28,890.00	\$10,214.00	54.69%
		E30	Credit Card Purchases		Credit Card	Credit Card Purchases; \$400 Domain GOV Renewal	\$1,000.00	\$1,000.00	\$0.00	0.00%
		E41	Out Of State Travel Expen on Behalf of State Employ		Out of State Travel	Travel Agent - Travel Leaders Additional FTEs budgeting for Travel	\$0.00	\$20,000.00	\$20,000.00	#Div/0!
		EE2	Conference, Training and Registration Fees		Conference	Conference, Training and Registrations Fees Increase for more FTEs by \$2,473	\$2,500.00	\$4,973.00	\$2,473.00	98.92%
			<b>Obj Class Totals:</b>				<b>\$22,776.00</b>	<b>\$56,663.00</b>	<b>\$33,887.00</b>	<b>148.78%</b>
		GG	ENERGY COSTS AND SPACE RENTAL							
		G01	Space Rental		Data Center	Increase \$85,158.72 for IGT move Data Center Costs (Rack Space, maintenance for 2 Data Centers)	\$85,158.72	\$85,158.72	\$0.00	0.00%
			<b>Obj Class Totals:</b>				<b>\$85,158.72</b>	<b>\$85,158.72</b>	<b>\$0.00</b>	<b>0.00%</b>
		JJ	OPERATIONAL SERVICES							
		J46	Temporary Help Services		TEMPORARY HELP SERVICES	SevenStep or other Temp Help	\$0.00	\$30,000.00	\$30,000.00	#Div/0!
		J50	Instructors/Lecturers/Trainers		Training	Technical Training not available on LinkedIn	\$5,000.00	\$5,000.00	\$0.00	0.00%
			<b>Obj Class Totals:</b>				<b>\$5,000.00</b>	<b>\$35,000.00</b>	<b>\$30,000.00</b>	<b>600.00%</b>
		KK	EQUIPMENT PURCHASE							

Approp	Budget Grouping	Division/ Bureau	Object Class	Object_name	Item Short Name	New Description	Current Year Amount	Next Year Amount	Variance	Percent Change
10500001	Mass. Gaming Commission									
	MGC Regulatory Costs									
		1400	Information Technology							
		K07	Office Furnishings		Office Equipment	Creative Office Pavillion	\$5,000.00	\$5,000.00	\$0.00	0.00%
			<b>Obj Class Totals:</b>				<b>\$5,000.00</b>	<b>\$5,000.00</b>	<b>\$0.00</b>	<b>0.00%</b>
		LL	<i>EQUIPMENT LEASE-MAINTAIN/REPAR</i>							
		L24	Motorized Vehicle Equipment Rental or Lease		MOTORIZED VEHICLE EQUIPMENT RENTAL OR LEASE	Enterprise Rental rental for conferences travel	\$0.00	\$500.00	\$500.00	#Div/0!
			<b>Obj Class Totals:</b>				<b>\$0.00</b>	<b>\$500.00</b>	<b>\$500.00</b>	<b>#Div/0!</b>
		NN	<i>INFRASTRUCTURE:</i>							
		N50	Non-Major Facility Infrastructure Maintenance and Repair		Facilities Maintenance	\$4,450 Annual Main & Support, Parts/HVAC monitoring; Viscom \$1,500 Building Security	\$10,000.00	\$10,000.00	\$0.00	0.00%
			<b>Obj Class Totals:</b>				<b>\$10,000.00</b>	<b>\$10,000.00</b>	<b>\$0.00</b>	<b>0.00%</b>
		UU	<i>IT Non-Payroll Expenses</i>							
		U01	Telecommunications Services Data		TELECOMMUNICAT IONS SERVICES DATA	Surveillance, CMS Primary/Backup Circuits, Lab Line, Windstream Services (VPN, LAN, WAN redundancy) etc decrease of \$144,390,22 from IGT Move	\$372,140.22	\$227,750.00	(\$144,390.22)	-38.80%
		U02	Telecommunications Services - Voice		TELECOMMUNICAT IONS SERVICES - VOICE	OfficeSuite (Voice, HD Meeting, WeConnect), Verizon Wireless, Multi-location fax lines Increase of \$52,422,26	\$80,587.74	\$133,010.00	\$52,422.26	65.05%
		U03	Software & Information Technology Licenses (IT)		SOFTWARE & INFORMATION TECHNOLOGY LICENSES (IT)	Azure Sentinel, M365 G5 Compliance, M365 G5 Security Adobe, Sharepoint, O365, Azure, JIRA, MDM etc Decrease of \$56,129.86	\$387,517.16	\$331,387.30	(\$56,129.86)	-14.48%
		U04	Information Technology Chargeback		INFORMATION TECHNOLOGY CHARGEBACK	EOTSS Offsite Rack Storage and Maintenance	\$0.00	\$65,000.00	\$65,000.00	#Div/0!
		U05	Information Technology (IT) Temp Staff Augmentation Profs		IT Staff Augment	Contract Systems Admin eDiscovery Specialist	\$0.00	\$80,000.00	\$80,000.00	#Div/0!
					IT Staff Augment	Talent Burst It Staff Augment	\$0.00	\$39,750.00	\$39,750.00	#Div/0!
					CMS - \$2,484,206.46	CMS - IGT Intelligen (PPC, MGM, EBH) IGT move adjusted costs down 39,127.83	\$2,326,368.27	\$2,287,240.44	(\$39,127.83)	-1.68%
					CONSULTING - \$75,000	IT Consulting Support (TBD)	\$50,000.00	\$50,000.00	\$0.00	0.00%
					IGT NOC Migration	Increase for data center move and for parts IGT NOC Migration Removed	\$403,961.00	\$0.00	(\$403,961.00)	-100.00%
					Staff Augmentations Professionals	McInnis Consulting Jira Expert Removed	\$10,000.00	\$0.00	(\$10,000.00)	-100.00%
		U06	Information Technology (IT) Cabling		IT Cabling	Runs/Cabling	\$3,000.00	\$3,000.00	\$0.00	0.00%

Approp	Budget Grouping	Division/Bureau	Object Class	Object_name	Item Short Name	New Description	Current Year Amount	Next Year Amount	Variance	Percent Change
10500001	Mass. Gaming Commission									
	MGC Regulatory Costs									
		1400	Information Technology							
		U07	Information Technology (IT) Equipment	Information Technology (IT) Equipment	IT Equipment	IT Equipment, emergency replacements (switches, routers, firewalls) etc Increase of \$91,325	\$103,675.00	\$195,000.00	\$91,325.00	88.09%
		U09	Information Technology (IT) Equip Rental Or Lease	Information Technology (IT) Equip Rental Or Lease	INFORMATION TECHNOLOGY (IT) EQUIP RENTAL OR LEASE	ACS Leases (Refresh) increase of lease costs for more FTEs of \$23,019.08	\$89,871.92	\$112,891.00	\$23,019.08	25.61%
		U10	Information Tech (IT) Equipment Maintenance & Repair	Information Tech (IT) Equipment Maintenance & Repair	IT Maintenance and Repair	Annual M&S Equipment/Services Reduction of \$16,605.88	\$94,238.97	\$77,633.09	(\$16,605.88)	-17.62%
		U11	Information Technology (IT) Contract Services	Information Technology (IT) Contract Services	IT Contract Services	LMS, Gartner, Tallan Servicese increase of \$201,439.85 includes Xfact for Licensing Maintenance	\$193,777.15	\$395,217.00	\$201,439.85	103.95%
						<b>Obj Class Totals:</b>	<b>\$4,115,137.43</b>	<b>\$3,997,878.83</b>	<b>(\$117,258.60)</b>	<b>-2.85%</b>
						<b>Division/Bureau Totals:</b>	<b>\$5,765,141.71</b>	<b>\$6,083,316.53</b>	<b>\$318,174.82</b>	<b>5.52%</b>
		1500	Commissioners							
		AA	REGULAR EMPLOYEE COMPENSATION							
		A01	Salaries: Inclusive	Salaries: Inclusive	Employee Compensation	Employee Compensation	\$595,397.04	\$698,593.14	\$103,196.10	17.33%
						<b>Obj Class Totals:</b>	<b>\$595,397.04</b>	<b>\$698,593.14</b>	<b>\$103,196.10</b>	<b>17.33%</b>
		BB	REGULAR EMPLOYEE RELATED EXPEN							
		B01	Other Out Of State Travel - INCLUSIVE: AIRFARE, HOTEL, LODGI	Other Out Of State Travel - INCLUSIVE: AIRFARE, HOTEL, LODGI	Travel Reimbursements	Travel Reimbursements --In State (6 Commission Meetings a Year, Site Visits) --Out of Pocket Out of State Expenses	\$18,000.00	\$18,000.00	\$0.00	0.00%
						<b>Obj Class Totals:</b>	<b>\$18,000.00</b>	<b>\$18,000.00</b>	<b>\$0.00</b>	<b>0.00%</b>
		DD	PENSION & INSURANCE RELATED EX							
		D09	Fringe Benefit Cost Recoupment	Fringe Benefit Cost Recoupment	Fringe	Fringe rate of 43.36%	\$258,759.55	\$302,909.99	\$44,150.44	17.06%
					Taxes	Tax rate of 2.45%	\$14,587.23	\$17,115.53	\$2,528.30	17.33%
						<b>Obj Class Totals:</b>	<b>\$273,346.78</b>	<b>\$320,025.52</b>	<b>\$46,678.74</b>	<b>17.08%</b>
		EE	ADMINISTRATIVE EXPENSES							
		E02	Printing Expenses & Supplies	Printing Expenses & Supplies	Office Supplies	Lane Printing, etc.	\$200.00	\$200.00	\$0.00	0.00%
		E12	Subscriptions, Memberships & Licensing Fees	Subscriptions, Memberships & Licensing Fees	Subscriptions	Trade Journals	\$5,950.00	\$5,950.00	\$0.00	0.00%
		E22	Temp Use Space/Confer-Incidental Includes Reservation Fees	Temp Use Space/Confer-Incidental Includes Reservation Fees	Meeting Space	Temporary Space @ 6mtgs - \$2K meeting space 6 mtgs and \$5k to stream for 4 of the meetings	\$32,000.00	\$32,000.00	\$0.00	0.00%
					Team Building	Team Building, Agency Conferences	\$8,000.00	\$8,000.00	\$0.00	0.00%
		E30	Credit Card Purchases	Credit Card Purchases	Credit Card	Allowable Credit Card Expenses	\$7,500.00	\$7,500.00	\$0.00	0.00%
		E41	Out Of State Travel Expen on Behalf of State Employ	Out Of State Travel Expen on Behalf of State Employ	Travel Agency Fees	Travel	\$10,000.00	\$10,000.00	\$0.00	0.00%

Approp	Budget Grouping	Division/Bureau	Object Class	Object_name	Item Short Name	New Description	Current Year Amount	Next Year Amount	Variance	Percent Change	
10500001	Mass. Gaming Commission										
	MGC Regulatory Costs										
		1500	Commissioners								
			EE2	Conference, Training and Registration Fees	Registration Fees	Conference/Trainings	\$7,000.00	\$7,000.00	\$0.00	0.00%	
			<b>Obj Class Totals:</b>					<b>\$70,650.00</b>	<b>\$70,650.00</b>	<b>\$0.00</b>	<b>0.00%</b>
			GG	ENERGY COSTS AND SPACE RENTAL							
			G01	Space Rental	75-101 Parking Garage	Parking 75-101--5 spaces. Two of the spaces are included in the lease. This item pays for 3 of the spaces.	\$13,642.20	\$13,642.20	\$0.00	0.00%	
			<b>Obj Class Totals:</b>					<b>\$13,642.20</b>	<b>\$13,642.20</b>	<b>\$0.00</b>	<b>0.00%</b>
			HH	CONSULTANT SVCS (TO DEPTS)							
			H09	Attorneys/Legal Services	Consultant	N/A	\$61,383.31	\$0.00	(\$61,383.31)	-100.00%	
			H23	Program Coordinators	Consultant	General Consulting	\$10,000.00	\$10,000.00	\$0.00	0.00%	
			<b>Obj Class Totals:</b>					<b>\$71,383.31</b>	<b>\$10,000.00</b>	<b>(\$61,383.31)</b>	<b>-85.99%</b>
			KK	EQUIPMENT PURCHASE							
			K07	Office Furnishings	Office Equipment	Office Furnishings	\$5,000.00	\$5,000.00	\$0.00	0.00%	
			<b>Obj Class Totals:</b>					<b>\$5,000.00</b>	<b>\$5,000.00</b>	<b>\$0.00</b>	<b>0.00%</b>
			<b>Division/Bureau Totals:</b>					<b>\$1,047,419.33</b>	<b>\$1,135,910.86</b>	<b>\$88,491.53</b>	<b>8.45%</b>
		1800	Communications								
			AA	REGULAR EMPLOYEE COMPENSATION							
			A01	Salaries: Inclusive	Employee Compensation	Regular Salaries	\$143,905.41	\$180,187.25	\$36,281.84	25.21%	
			<b>Obj Class Totals:</b>					<b>\$143,905.41</b>	<b>\$180,187.25</b>	<b>\$36,281.84</b>	<b>25.21%</b>
			BB	REGULAR EMPLOYEE RELATED EXPEN							
			B02	In-State Travel	Travel Reimbursement	In-State Travel Reimbursement	\$4,488.75	\$4,488.75	\$0.00	0.00%	
			<b>Obj Class Totals:</b>					<b>\$4,488.75</b>	<b>\$4,488.75</b>	<b>\$0.00</b>	<b>0.00%</b>
			DD	PENSION & INSURANCE RELATED EX							
			D09	Fringe Benefit Cost Recoupment	Fringe	Fringe rate of 43.36%	\$62,541.29	\$78,129.19	\$15,587.90	24.92%	
					Taxes	Tax rate of 2.45%	\$3,525.68	\$4,414.59	\$888.91	25.21%	
			<b>Obj Class Totals:</b>					<b>\$66,066.97</b>	<b>\$82,543.78</b>	<b>\$16,476.81</b>	<b>24.94%</b>
			EE	ADMINISTRATIVE EXPENSES							
			E02	Printing Expenses & Supplies	Printing	Printing	\$6,100.00	\$6,100.00	\$0.00	0.00%	
			E12	Subscriptions, Memberships & Licensing Fees	Subscriptions	Subscriptions, Licensing, Memberships	\$35,650.00	\$35,650.00	\$0.00	0.00%	
			<b>Obj Class Totals:</b>					<b>\$41,750.00</b>	<b>\$41,750.00</b>	<b>\$0.00</b>	<b>0.00%</b>
			HH	CONSULTANT SVCS (TO DEPTS)							
			HH3	Media Design, Editorial and Communication	Website Design	Marketing & Website Design	\$25,000.00	\$25,000.00	\$0.00	0.00%	
			<b>Obj Class Totals:</b>					<b>\$25,000.00</b>	<b>\$25,000.00</b>	<b>\$0.00</b>	<b>0.00%</b>

Approp	Budget Grouping	Division/ Bureau	Object Class	Object_name	Item Short Name	New Description	Current Year Amount	Next Year Amount	Variance	Percent Change	
10500001	Mass. Gaming Commission										
	MGC Regulatory Costs										
		1800	Communications								
			JJ	OPERATIONAL SERVICES							
			JJ2	Auxiliary Services	Streaming	Streaming & Production of Public Meetings	\$23,000.00	\$23,000.00	\$0.00	0.00%	
			<b>Obj Class Totals:</b>					<b>\$23,000.00</b>	<b>\$23,000.00</b>	<b>\$0.00</b>	<b>0.00%</b>
			KK	EQUIPMENT PURCHASE							
			K05	Office Equipment	Equipment Purchases	Increased to purchase additional Photography/Streaming Equipment Net Zero Purchase	\$5,000.00	\$5,000.00	\$0.00	0.00%	
			<b>Obj Class Totals:</b>					<b>\$5,000.00</b>	<b>\$5,000.00</b>	<b>\$0.00</b>	<b>0.00%</b>
			<b>Division/Bureau Totals:</b>					<b>\$309,211.13</b>	<b>\$361,969.78</b>	<b>\$52,758.65</b>	<b>17.06%</b>
		1900	Ombudsman								
			AA	REGULAR EMPLOYEE COMPENSATION							
			A01	Salaries: Inclusive	Employee Compensation	Regular Employees	\$114,521.78	\$56,699.47	(\$57,822.31)	-50.49%	
			<b>Obj Class Totals:</b>					<b>\$114,521.78</b>	<b>\$56,699.47</b>	<b>(\$57,822.31)</b>	<b>-50.49%</b>
			BB	REGULAR EMPLOYEE RELATED EXPEN							
			B02	In-State Travel	In State Travel Reimbursement	In-State Travel Reimbursement and Out of State --Visits to Other Licensee Sites	\$2,992.50	\$2,992.50	\$0.00	0.00%	
			<b>Obj Class Totals:</b>					<b>\$2,992.50</b>	<b>\$2,992.50</b>	<b>\$0.00</b>	<b>0.00%</b>
			DD	PENSION & INSURANCE RELATED EX							
			D09	Fringe Benefit Cost Recoupment	Fringe	Fringe rate of 43.36%	\$49,771.17	\$24,584.90	(\$25,186.27)	-50.60%	
					Taxes	Tax rate of 2.45%	\$2,805.78	\$1,389.14	(\$1,416.64)	-50.49%	
			<b>Obj Class Totals:</b>					<b>\$52,576.95</b>	<b>\$25,974.04</b>	<b>(\$26,602.91)</b>	<b>-50.60%</b>
			<b>Division/Bureau Totals:</b>					<b>\$170,091.23</b>	<b>\$85,666.01</b>	<b>(\$84,425.22)</b>	<b>-49.64%</b>
		5000	Investigations and Enforcement Bureau								
			AA	REGULAR EMPLOYEE COMPENSATION							
			A01	Salaries: Inclusive	Employee Compensation	Employee Salaries	\$3,931,409.73	\$4,078,309.25	\$146,899.52	3.74%	
			A08	Overtime Pay	Overtime	Overtime for Gaming Agents.	\$100,000.00	\$0.00	(\$100,000.00)	-100.00%	
			<b>Obj Class Totals:</b>					<b>\$4,031,409.73</b>	<b>\$4,078,309.25</b>	<b>\$46,899.52</b>	<b>1.16%</b>
			BB	REGULAR EMPLOYEE RELATED EXPEN							
			B01	Other Out Of State Travel - INCLUSIVE: AIRFARE, HOTEL, LODGI	Travel	Out of state travel reimbursements for gaming enforcement agents and non-state police staff	\$15,000.00	\$15,000.00	\$0.00	0.00%	
			B02	In-State Travel	Travel	In-state-travel reimbursements for gaming enforcement agents and non-state police staff	\$7,980.00	\$7,980.00	\$0.00	0.00%	
			<b>Obj Class Totals:</b>					<b>\$22,980.00</b>	<b>\$22,980.00</b>	<b>\$0.00</b>	<b>0.00%</b>

Approp	Budget Grouping	Division/ Bureau	Object Class	Object_name	Item Short Name	New Description	Current Year Amount	Next Year Amount	Variance	Percent Change
10500001	Mass. Gaming Commission									
	MGC Regulatory Costs									
		5000	Investigations and Enforcement Bureau							
		CC	SPECIAL EMPLOYEES							
		C23	Management, Business Professionals & Admin Services	Contract Employee	Contracted Civilian Investigators		\$124,800.00	\$130,000.00	\$5,200.00	4.17%
			<b>Obj Class Totals:</b>				<b>\$124,800.00</b>	<b>\$130,000.00</b>	<b>\$5,200.00</b>	<b>4.17%</b>
		DD	PENSION & INSURANCE RELATED EX							
		D09	Fringe Benefit Cost Recoupment	Fringe	Fringe rate of 43.36%		\$1,708,290.66	\$1,768,354.90	\$60,064.24	3.52%
				Taxes	Tax rate of 2.45%		\$96,319.54	\$99,918.57	\$3,599.03	3.74%
				Taxes	Taxes on CC Employees 2.45%		\$3,057.60	\$2,697.35	(\$360.25)	-11.78%
			<b>Obj Class Totals:</b>				<b>\$1,807,667.80</b>	<b>\$1,870,970.82</b>	<b>\$63,303.02</b>	<b>3.50%</b>
		EE	ADMINISTRATIVE EXPENSES							
		E01	Office & Administrative Supplies	Supplies	Supplies		\$5,000.00	\$5,000.00	\$0.00	0.00%
		E12	Subscriptions, Memberships & Licensing Fees	Subscriptions	Lexis Nexis,Hire Authority, Nat.Student Loan Increase of \$500/month for GOLD Subscription Service		\$101,000.00	\$101,000.00	\$0.00	0.00%
		E20	Motor Vehicle Chargeback	Motor Vehicle Lease	OVM Chargeback		\$6,110.00	\$6,110.00	\$0.00	0.00%
		E30	Credit Card Purchases	Credit Card	Credit Card Purchases		\$15,000.00	\$15,000.00	\$0.00	0.00%
		E41	Out Of State Travel Expen on Behalf of State Employ	Travel Agent	Travel Agent for Trainings and Investigations Decrease of \$20K for costs shared with Sports Wagering		\$100,000.00	\$80,000.00	(\$20,000.00)	-20.00%
		EE2	Conference, Training and Registration Fees	Registrations	Training/Conference Registration Fees. Decreased \$5k for costs shared with Sports Wagering		\$30,000.00	\$25,000.00	(\$5,000.00)	-16.67%
			<b>Obj Class Totals:</b>				<b>\$257,110.00</b>	<b>\$232,110.00</b>	<b>(\$25,000.00)</b>	<b>-9.72%</b>
		FF	FACILITY OPERATIONAL EXPENSES							
		F09	Clothing & Footwear	Programatic Supplies	Clothing and Footwear		\$20,000.00	\$20,000.00	\$0.00	0.00%
			<b>Obj Class Totals:</b>				<b>\$20,000.00</b>	<b>\$20,000.00</b>	<b>\$0.00</b>	<b>0.00%</b>
		JJ	OPERATIONAL SERVICES							
		J25	Laboratory & Pharmaceutical Services	Everett Police	EPDEverett Police GEU 7FTE's Increase of 5% year over year, 4% for salaries		\$1,666,543.75	\$1,748,361.00	\$81,817.25	4.91%
				Finger Prints State Police	Chargeback for Finger Print Costs for Licenses \$50/set and ~4.5K prints		\$50,000.00	\$50,000.00	\$0.00	0.00%
				Plainville Police Salaries	Plainville Local Police Increase 3% for salaries as well as \$17.29k for operational equipment portable radios and body cameras		\$412,743.22	\$441,055.27	\$28,312.05	6.86%
				Springfield Police Salaries	SPDSpringfield Police GEU 7 FTEs Increase of 3% on updated FY24 Budget		\$1,089,648.14	\$1,207,684.31	\$118,036.17	10.83%

Approp	Budget Grouping	Division/Bureau	Object Class	Object_name	Item Short Name	New Description	Current Year Amount	Next Year Amount	Variance	Percent Change
10500001	Mass. Gaming Commission									
	MGC Regulatory Costs									
	5000	Investigations and Enforcement Bureau								
	J25	Laboratory & Pharmaceutical Services			State Police	MSP MGC Salaries for MGC Investigations and Background Unit 4% increase plus taxes plus 3 additional FTEs	\$983,275.34	\$1,012,733.60	\$29,458.26	3.00%
					State Police	MSPMGC Staff Costs at MGM 16 FTEs 4% Increase plus taxes	\$1,890,486.33	\$2,062,795.61	\$172,309.28	9.11%
					State Police	MSPMGC State Police Troopers Plainville Straight Time and Payroll Taxes 4% increase plus taxes	\$1,316,353.58	\$1,531,220.58	\$214,867.00	16.32%
					State Police	MSPMGC State Troopers Everett 4% increase plus taxes	\$1,793,626.06	\$1,923,570.47	\$129,944.41	7.24%
					State Police	Racing TroopersShifted Costs to Gaming 4% increase plus taxes	\$388,377.37	\$443,340.30	\$54,962.93	14.15%
					State Police OT & Travel	OT and Travel for Troopers assigned to MGC GEU Increase 4% plus taxes	\$2,056,111.75	\$2,183,475.54	\$127,363.79	6.19%
	J28	Law Enforcement			Lease Vehicles	Plainville Law Enforcement Vehicles	\$8,877.39	\$8,877.39	\$0.00	0.00%
						<b>Obj Class Totals:</b>	<b>\$11,656,042.93</b>	<b>\$12,613,114.07</b>	<b>\$957,071.14</b>	<b>8.21%</b>
	KK	EQUIPMENT PURCHASE								
	K07	Office Furnishings			Office Equipment	Patrol Rifles/Active Shooter Gear-- Replacement/Upgrade of Fingerprint Machines to be Windows Compliant	\$47,000.00	\$47,000.00	\$0.00	0.00%
						<b>Obj Class Totals:</b>	<b>\$47,000.00</b>	<b>\$47,000.00</b>	<b>\$0.00</b>	<b>0.00%</b>
	NN	INFRASTRUCTURE:								
	N50	Non-Major Facility Infrastructure Maintenance and Repair			Non-Major Facility Maintenance & Repair	Office Reconfiguration	\$15,000.00	\$15,000.00	\$0.00	0.00%
						<b>Obj Class Totals:</b>	<b>\$15,000.00</b>	<b>\$15,000.00</b>	<b>\$0.00</b>	<b>0.00%</b>
	UU	IT Non-Payroll Expenses								
	U03	Software & Information Technology Licenses (IT)			Software	ITRACK- OmnigoIncrease \$1k for costs	\$13,000.00	\$14,000.00	\$1,000.00	7.69%
						<b>Obj Class Totals:</b>	<b>\$13,000.00</b>	<b>\$14,000.00</b>	<b>\$1,000.00</b>	<b>7.69%</b>
						<b>Division/Bureau Totals:</b>	<b>\$17,995,010.46</b>	<b>\$19,043,484.14</b>	<b>\$1,048,473.68</b>	<b>5.83%</b>
	7000	Licensing Division								
	AA	REGULAR EMPLOYEE COMPENSATION								
	A01	Salaries: Inclusive			Employee Compensation	Regular Employee Salaries	\$653,328.24	\$577,193.03	(\$76,135.21)	-11.65%
						<b>Obj Class Totals:</b>	<b>\$653,328.24</b>	<b>\$577,193.03</b>	<b>(\$76,135.21)</b>	<b>-11.65%</b>
	BB	REGULAR EMPLOYEE RELATED EXPEN								
	B01	Other Out Of State Travel - INCLUSIVE: AIRFARE, HOTEL, LODGI			Travel	Out-of State Travel Reimbursements	\$1,875.00	\$1,875.00	\$0.00	0.00%

Approp	Budget Grouping	Division/Bureau	Object Class	Object_name	Item Short Name	New Description	Current Year Amount	Next Year Amount	Variance	Percent Change
10500001	Mass. Gaming Commission									
	MGC Regulatory Costs									
		7000	Licensing Division							
		B02	In-State Travel		Travel	In-State Travel Reimbursements-- Fingerprinting Reimbursements	\$997.50	\$0.00	(\$997.50)	-100.00%
			<b>Obj Class Totals:</b>				<b>\$2,872.50</b>	<b>\$1,875.00</b>	<b>(\$997.50)</b>	<b>-34.73%</b>
		DD	PENSION & INSURANCE RELATED EX							
		D09	Fringe Benefit Cost Recoupment		Fringe	Fringe rate of 43.36%	\$283,936.45	\$250,270.89	(\$33,665.56)	-11.86%
					Taxes	Tax rate of 2.45%	\$16,006.54	\$14,141.23	(\$1,865.31)	-11.65%
			<b>Obj Class Totals:</b>				<b>\$299,943.00</b>	<b>\$264,412.12</b>	<b>(\$35,530.88)</b>	<b>-11.85%</b>
		EE	ADMINISTRATIVE EXPENSES							
		E02	Printing Expenses & Supplies		Supplies	Supplies	\$7,500.00	\$7,500.00	\$0.00	0.00%
		E06	Postage		Postage	Federal Express Charges	\$1,500.00	\$1,500.00	\$0.00	0.00%
		E41	Out Of State Travel Expen on Behalf of State Employ		Travel Agent	Travel Leaders G2E for meetings with Vendors and Licensing of Primaries	\$7,000.00	\$7,000.00	\$0.00	0.00%
		EE2	Conference, Training and Registration Fees		Conferences	Conference, Training & Registration.	\$4,000.00	\$4,000.00	\$0.00	0.00%
			<b>Obj Class Totals:</b>				<b>\$20,000.00</b>	<b>\$20,000.00</b>	<b>\$0.00</b>	<b>0.00%</b>
		LL	EQUIPMENT LEASE-MAINTAIN/REPAR							
		L26	Printing/Photocopy & Micrographics Equip Rent/Lease		Equipment Leases	Increased for Idemia Scanner Maintenance	\$10,000.00	\$25,000.00	\$15,000.00	150.00%
			<b>Obj Class Totals:</b>				<b>\$10,000.00</b>	<b>\$25,000.00</b>	<b>\$15,000.00</b>	<b>150.00%</b>
		UU	IT Non-Payroll Expenses							
		U03	Software & Information Technology Licenses (IT)		Software	Licensing System Software	\$0.00	\$350,000.00	\$350,000.00	#Div/0!
		U11	Information Technology (IT) Contract Services		IT Consultant	Licensing System Implementation	\$0.00	\$262,500.00	\$262,500.00	#Div/0!
			<b>Obj Class Totals:</b>				<b>\$0.00</b>	<b>\$612,500.00</b>	<b>\$612,500.00</b>	<b>#Div/0!</b>
			<b>Division/Bureau Totals:</b>				<b>\$986,143.74</b>	<b>\$1,500,980.15</b>	<b>\$514,836.42</b>	<b>52.21%</b>
		All	All Divisions							
		AA	REGULAR EMPLOYEE COMPENSATION							
		A01	Salaries: Inclusive		Employee Compensation	N/A	\$169,185.91	\$0.00	(\$169,185.91)	-100.00%
					Regular Employee Compensation	Turnover Savings 5% of payroll	(\$350,000.00)	(\$482,699.66)	(\$132,699.66)	37.91%
			<b>Obj Class Totals:</b>				<b>(\$180,814.09)</b>	<b>(\$482,699.66)</b>	<b>(\$301,885.57)</b>	<b>166.96%</b>
		DD	PENSION & INSURANCE RELATED EX							
		D09	Fringe Benefit Cost Recoupment		Fringe and Payroll Taxes	Fringe and Payroll Taxes on Turnover Savings (45.81%)	(\$160,335.00)	(\$221,124.72)	(\$60,789.72)	37.91%
					Fringe and Taxes	N/A	\$77,504.07	\$0.00	(\$77,504.07)	-100.00%
			<b>Obj Class Totals:</b>				<b>(\$82,830.93)</b>	<b>(\$221,124.72)</b>	<b>(\$138,293.79)</b>	<b>166.96%</b>
			<b>Division/Bureau Totals:</b>				<b>(\$263,645.02)</b>	<b>(\$703,824.38)</b>	<b>(\$440,179.36)</b>	<b>166.96%</b>



Approp	Budget Grouping	Division/Bureau	Object Class	Object_name	Item Short Name	New Description	Current Year Amount	Next Year Amount	Variance	Percent Change
10500001	Mass. Gaming Commission			MGC Regulatory Costs						
	MGC Regulatory Costs						\$31,610,283.62	\$33,132,023.00	\$1,521,739.38	4.81%
				<b>Totals:</b>						

Approp	Budget Grouping	Division/Bureau	Object Class	Object_name	Item Short Name	New Description	Current Year Amount	Next Year Amount	Variance	Percent Change
10500001	Mass. Gaming Commission									
	Indirect									
		2000	MGC Indirect							
			EE	ADMINISTRATIVE EXPENSES						
			E16	Indirect Cost Recoupment	Indirect Agency Wide	Indirect at 10% of AA, CC, HH, JJ and UU excluding U07	\$55,756.33	\$0.00	(\$55,756.33)	-100.00%
					Indirect Agency Wide	Indirect at 10% of AA, CC, HH, JJ and UU excluding U07	\$2,549,564.19	\$2,668,901.53	\$119,337.34	4.68%
			<b>Obj Class Totals:</b>				\$2,605,320.52	\$2,668,901.53	\$63,581.01	2.44%
			<b>Division/Bureau Totals:</b>				\$2,605,320.52	\$2,668,901.53	\$63,581.01	2.44%
	Indirect		<b>Totals:</b>				\$2,605,320.52	\$2,668,901.53	\$63,581.01	2.44%

Approp	Budget Grouping	Division/Bureau	Object Class	Object_name	Item Short Name	New Description	Current Year Amount	Next Year Amount	Variance	Percent Change
10500001	Mass. Gaming Commission									
	Office of Attorney General and AGO MSP									
	9000	Office of the Attorney General								
	JJ	OPERATIONAL SERVICES								
	J25	Laboratory & Pharmaceutical Services			State Police	MSPAGO Straight Time Troopers 4% increase including Payroll Taxes	\$636,238.55	\$687,879.43	\$51,640.88	8.12%
					State Police	MSPAGO State Police OT4% increase plus taxes	\$360,500.00	\$382,830.81	\$22,330.81	6.19%
						<b>Obj Class Totals:</b>	<b>\$996,738.55</b>	<b>\$1,070,710.24</b>	<b>\$73,971.69</b>	<b>7.42%</b>
	OO									
	O99				Attorney General	place holder Funds FTEs assigned to the unit, various percentages of FTEs of support, and management positions, office space, travel, conferences, and investigative costs.	\$2,927,384.00	\$2,927,384.00	\$0.00	0.00%
						<b>Obj Class Totals:</b>	<b>\$2,927,384.00</b>	<b>\$2,927,384.00</b>	<b>\$0.00</b>	<b>0.00%</b>
						<b>Division/Bureau Totals:</b>	<b>\$3,924,122.55</b>	<b>\$3,998,094.24</b>	<b>\$73,971.69</b>	<b>1.89%</b>
	Office of Attorney General and AGO MSP					<b>Totals:</b>	<b>\$3,924,122.55</b>	<b>\$3,998,094.24</b>	<b>\$73,971.69</b>	<b>1.89%</b>

Approp	Budget Grouping	Division/Bureau	Object Class	Object_name	Item Short Name	New Description	Current Year Amount	Next Year Amount	Variance	Percent Change
10500001	Mass. Gaming Commission									
	Alcohol and Beverage Control Commission									
		9001								
			00							
			001		ISA with ABCC	ABCC	\$75,000.00	\$75,000.00	\$0.00	0.00%
			<b>Obj Class Totals:</b>				<b>\$75,000.00</b>	<b>\$75,000.00</b>	<b>\$0.00</b>	<b>0.00%</b>
			<b>Division/Bureau Totals:</b>				<b>\$75,000.00</b>	<b>\$75,000.00</b>	<b>\$0.00</b>	<b>0.00%</b>
	<b>Alcohol and Beverage Control Commission Totals:</b>						<b>\$75,000.00</b>	<b>\$75,000.00</b>	<b>\$0.00</b>	<b>0.00%</b>

Approp	Budget Grouping	Division/ Bureau	Object Class	Object_name	Item Short Name	New Description	Current Year Amount	Next Year Amount	Variance	Percent Change
10500001	Mass. Gaming Commission									
<b>Appropriation Totals</b>							<b>\$38,214,726.69</b>	<b>\$39,874,018.77</b>	<b>\$1,659,292.08</b>	<b>4.34%</b>
10500003	MGC Mass Racing Development and Oversight									
	MGC Regulatory Costs									
	1000	Finance and Administration								
	AA	REGULAR EMPLOYEE COMPENSATION								
	A01	Salaries: Inclusive			Employee Compensation	Admin Employees Salaries	\$102,489.31	\$90,663.52	(\$11,825.79)	-11.54%
		<b>Obj Class Totals:</b>					<b>\$102,489.31</b>	<b>\$90,663.52</b>	<b>(\$11,825.79)</b>	<b>-11.54%</b>
	DD	PENSION & INSURANCE RELATED EX								
	D09	Fringe Benefit Cost Recoupment			Fringe	Fringe rate of 43.36%	\$44,541.85	\$39,311.70	(\$5,230.15)	-11.74%
					Taxes	Tax rate of 2.45%	\$2,510.99	\$2,221.26	(\$289.73)	-11.54%
		<b>Obj Class Totals:</b>					<b>\$47,052.84</b>	<b>\$41,532.96</b>	<b>(\$5,519.88)</b>	<b>-11.73%</b>
		<b>Division/Bureau Totals:</b>					<b>\$149,542.15</b>	<b>\$132,196.48</b>	<b>(\$17,345.67)</b>	<b>-11.60%</b>
	1100	Human Resources								
	AA	REGULAR EMPLOYEE COMPENSATION								
	A01	Salaries: Inclusive			Employee Compensation	HR Employees Salaries	\$27,166.97	\$13,561.75	(\$13,605.22)	-50.08%
					Raises	3% COLA/Incentives/Equity Agency Wide	\$37,277.01	\$18,910.14	(\$18,366.87)	-49.27%
		<b>Obj Class Totals:</b>					<b>\$64,443.98</b>	<b>\$32,471.89</b>	<b>(\$31,972.09)</b>	<b>-49.61%</b>
	CC	SPECIAL EMPLOYEES								
	C23	Management, Business Professionals & Admin Services			Contract Employee	Administrative Help	\$5,200.00	\$5,200.00	\$0.00	0.00%
		<b>Obj Class Totals:</b>					<b>\$5,200.00</b>	<b>\$5,200.00</b>	<b>\$0.00</b>	<b>0.00%</b>
	DD	PENSION & INSURANCE RELATED EX								
	D09	Fringe Benefit Cost Recoupment			Fringe	Fringe rate of 43.36%	\$11,806.77	\$5,880.37	(\$5,926.40)	-50.19%
					Taxes	Tax rate of 2.45%	\$665.59	\$332.26	(\$333.33)	-50.08%
		<b>Obj Class Totals:</b>					<b>\$12,472.36</b>	<b>\$6,212.63</b>	<b>(\$6,259.73)</b>	<b>-50.19%</b>
		<b>Division/Bureau Totals:</b>					<b>\$82,116.34</b>	<b>\$43,884.52</b>	<b>(\$38,231.82)</b>	<b>-46.56%</b>
	1200	Legal								
	AA	REGULAR EMPLOYEE COMPENSATION								
	A01	Salaries: Inclusive			Employee Compensation	Legal Employees Salaries	\$58,533.91	\$28,684.14	(\$29,849.77)	-51.00%
		<b>Obj Class Totals:</b>					<b>\$58,533.91</b>	<b>\$28,684.14</b>	<b>(\$29,849.77)</b>	<b>-51.00%</b>
	DD	PENSION & INSURANCE RELATED EX								
	D09	Fringe Benefit Cost Recoupment			Fringe	Fringe rate of 43.36%	\$23,304.82	\$12,437.44	(\$10,867.38)	-46.63%
					Taxes	Tax rate of 2.45%	\$1,314.64	\$702.76	(\$611.88)	-46.54%
		<b>Obj Class Totals:</b>					<b>\$24,619.46</b>	<b>\$13,140.20</b>	<b>(\$11,479.26)</b>	<b>-46.63%</b>
		<b>Division/Bureau Totals:</b>					<b>\$83,153.37</b>	<b>\$41,824.34</b>	<b>(\$41,329.03)</b>	<b>-49.70%</b>
	1300	Executive Director								

Approp	Budget Grouping	Division/ Bureau	Object Class	Object_name	Item Short Name	New Description	Current Year Amount	Next Year Amount	Variance	Percent Change
10500003	MGC Mass Racing Development and Oversigh									
	MGC Regulatory Costs									
	1300	Executive Director								
	AA	REGULAR EMPLOYEE COMPENSATION								
	A01	Salaries: Inclusive	Employee Compensation	Exec. Dir.	Employees Salaries		\$38,412.71	\$16,174.31	(\$22,238.40)	-57.89%
	<b>Obj Class Totals:</b>						<b>\$38,412.71</b>	<b>\$16,174.31</b>	<b>(\$22,238.40)</b>	<b>-57.89%</b>
	DD	PENSION & INSURANCE RELATED EX								
	D09	Fringe Benefit Cost Recoupment	Fringe	Fringe rate of 43.36%			\$13,603.73	\$7,013.19	(\$6,590.54)	-48.45%
			Taxes	Tax rate of 2.45%			\$766.89	\$396.27	(\$370.62)	-48.33%
	<b>Obj Class Totals:</b>						<b>\$14,370.62</b>	<b>\$7,409.46</b>	<b>(\$6,961.16)</b>	<b>-48.44%</b>
	<b>Division/Bureau Totals:</b>						<b>\$52,783.33</b>	<b>\$23,583.77</b>	<b>(\$29,199.56)</b>	<b>-55.32%</b>
	1400	Information Technology								
	AA	REGULAR EMPLOYEE COMPENSATION								
	A01	Salaries: Inclusive	Employee Compensation	IT	Employees Salaries		\$99,434.49	\$50,863.65	(\$48,570.84)	-48.85%
	<b>Obj Class Totals:</b>						<b>\$99,434.49</b>	<b>\$50,863.65</b>	<b>(\$48,570.84)</b>	<b>-48.85%</b>
	DD	PENSION & INSURANCE RELATED EX								
	D09	Fringe Benefit Cost Recoupment	Fringe	Fringe rate of 43.36%			\$43,207.81	\$22,054.48	(\$21,153.33)	-48.96%
			Taxes	Tax rate of 2.45%			\$2,436.15	\$1,246.15	(\$1,190.00)	-48.85%
	<b>Obj Class Totals:</b>						<b>\$45,643.95</b>	<b>\$23,300.63</b>	<b>(\$22,343.32)</b>	<b>-48.95%</b>
	<b>Division/Bureau Totals:</b>						<b>\$145,078.44</b>	<b>\$74,164.28</b>	<b>(\$70,914.16)</b>	<b>-48.88%</b>
	1500	Commissioners								
	AA	REGULAR EMPLOYEE COMPENSATION								
	A01	Salaries: Inclusive	Employee Compensation	Commissioners	Employees Salaries		\$59,539.70	\$31,280.31	(\$28,259.39)	-47.46%
	<b>Obj Class Totals:</b>						<b>\$59,539.70</b>	<b>\$31,280.31</b>	<b>(\$28,259.39)</b>	<b>-47.46%</b>
	DD	PENSION & INSURANCE RELATED EX								
	D09	Fringe Benefit Cost Recoupment	Fringe	Fringe rate of 43.36%			\$25,875.95	\$13,563.14	(\$12,312.81)	-47.58%
			Taxes	Tax rate of 2.45%			\$1,458.72	\$766.37	(\$692.35)	-47.46%
	<b>Obj Class Totals:</b>						<b>\$27,334.68</b>	<b>\$14,329.51</b>	<b>(\$13,005.17)</b>	<b>-47.58%</b>
	<b>Division/Bureau Totals:</b>						<b>\$86,874.38</b>	<b>\$45,609.82</b>	<b>(\$41,264.56)</b>	<b>-47.50%</b>
	1800	Communications								
	AA	REGULAR EMPLOYEE COMPENSATION								
	A01	Salaries: Inclusive	Employee Compensation	Communications	Employees Salaries		\$14,390.54	\$7,183.75	(\$7,206.79)	-50.08%
	<b>Obj Class Totals:</b>						<b>\$14,390.54</b>	<b>\$7,183.75</b>	<b>(\$7,206.79)</b>	<b>-50.08%</b>
	DD	PENSION & INSURANCE RELATED EX								
	D09	Fringe Benefit Cost Recoupment	Fringe	Fringe rate of 43.36%			\$6,254.13	\$3,114.87	(\$3,139.26)	-50.19%
			Taxes	Tax rate of 2.45%			\$352.57	\$176.00	(\$176.57)	-50.08%

Approp	Budget Grouping	Division/Bureau	Object Class	Object_name	Item Short Name	New Description	Current Year Amount	Next Year Amount	Variance	Percent Change
10500003	MGC Mass Racing Development and Oversight									
	MGC Regulatory Costs									
	1800	Communications								
		<b>Obj Class Totals:</b>					\$6,606.70	\$3,290.87	(\$3,315.83)	-50.19%
		<b>Division/Bureau Totals:</b>					\$20,997.24	\$10,474.62	(\$10,522.62)	-50.11%
	3000	Racing Division								
	AA	REGULAR EMPLOYEE COMPENSATION								
	A01	Salaries: Inclusive	Employee Compensation	Regular Employee Salaries		\$322,652.95	\$361,690.94	\$39,037.99	12.10%	
		<b>Obj Class Totals:</b>					\$322,652.95	\$361,690.94	\$39,037.99	12.10%
	BB	REGULAR EMPLOYEE RELATED EXPEN								
	B01	Other Out Of State Travel - INCLUSIVE: AIRFARE, HOTEL, LODGI	Travel	Out of State Travel Reimbursement Reduced \$6k		\$10,000.00	\$4,000.00	(\$6,000.00)	-60.00%	
	B02	In-State Travel	Travel	In State Travel Reimbursement Reduced 1K		\$3,000.00	\$2,000.00	(\$1,000.00)	-33.33%	
		<b>Obj Class Totals:</b>					\$13,000.00	\$6,000.00	(\$7,000.00)	-53.85%
	CC	SPECIAL EMPLOYEES								
	C04	Contracted Seasonal Employees	Seasonals	Seasonal Employees		\$482,040.00	\$482,040.00	\$0.00	0.00%	
		<b>Obj Class Totals:</b>					\$482,040.00	\$482,040.00	\$0.00	0.00%
	DD	PENSION & INSURANCE RELATED EX								
	D09	Fringe Benefit Cost Recoupment	Fringe	Fringe rate of 43.36%		\$140,224.97	\$156,829.20	\$16,604.23	11.84%	
			Taxes	Tax rate of 2.45%		\$7,905.00	\$8,861.42	\$956.42	12.10%	
		<b>Obj Class Totals:</b>					\$148,129.97	\$165,690.62	\$17,560.65	11.85%
	EE	ADMINISTRATIVE EXPENSES								
	E01	Office & Administrative Supplies	Supplies	W.B. Mason moved to Finance		\$7,500.00	\$0.00	(\$7,500.00)	-100.00%	
	E02	Printing Expenses & Supplies	Printing	Millineum Printing moved to Finance		\$500.00	\$0.00	(\$500.00)	-100.00%	
	E12	Subscriptions, Memberships & Licensing Fees	Memberships	AA Dority/Organization of Racing Investigators not renewing would fall under IEB		\$5,625.00	\$0.00	(\$5,625.00)	-100.00%	
			Memberships	Assoc. of Racing Regulators		\$18,700.00	\$18,700.00	\$0.00	0.00%	
	E13	Advertising Expenses	Public Hearing Notices	Boston Globe moved to Legal		\$1,000.00	\$0.00	(\$1,000.00)	-100.00%	
			Public Hearing Notices	Boston Herald moved to Legal		\$700.00	\$0.00	(\$700.00)	-100.00%	
	E15	Bottled Water	Water	Belmont Springs/DS Waters of America		\$360.00	\$360.00	\$0.00	0.00%	
	E41	Out Of State Travel Expen on Behalf of State Employ	Travel Agent	Travel		\$5,000.00	\$5,000.00	\$0.00	0.00%	
	EE2	Conference, Training and Registration Fees	Conferences	Assoc. of Racing Comm./Louisiana Racing/Thoroughbred Racing		\$3,000.00	\$3,000.00	\$0.00	0.00%	
		<b>Obj Class Totals:</b>					\$42,385.00	\$27,060.00	(\$15,325.00)	-36.16%
	FF	FACILITY OPERATIONAL EXPENSES								
	F05	Laboratory Supplies	Vet Supplies	Gloves, scrubs etc.		\$2,000.00	\$2,000.00	\$0.00	0.00%	

Approp	Budget Grouping	Division/ Bureau	Object Class	Object_name	Item Short Name	New Description	Current Year Amount	Next Year Amount	Variance	Percent Change	
10500003	MGC Mass Racing Development and Oversight										
	MGC Regulatory Costs										
	3000	Racing Division									
	F09	Clothing & Footwear	Equipment	Misc Facility Equipment Removed from Budget			\$25,000.00	\$0.00	(\$25,000.00)	-100.00%	
			Uniforms	Racing Uniforms for Seasonal Employees Reduced \$15K			\$15,000.00	\$10,000.00	(\$5,000.00)	-33.33%	
			<b>Obj Class Totals:</b>					<b>\$42,000.00</b>	<b>\$12,000.00</b>	<b>(\$30,000.00)</b>	<b>-71.43%</b>
	HH	CONSULTANT SVCS (TO DEPTS)									
	H19	Management Consultants	Hearing Officer	Hearing Officer for Racing Appeals			\$25,000.00	\$10,000.00	(\$15,000.00)	-60.00%	
			<b>Obj Class Totals:</b>					<b>\$25,000.00</b>	<b>\$10,000.00</b>	<b>(\$15,000.00)</b>	<b>-60.00%</b>
	JJ	OPERATIONAL SERVICES									
	J10	Auxiliary Financial Services	Credit Cards	Bank of America credit card terminal fees			\$1,000.00	\$1,000.00	\$0.00	0.00%	
	J25	Laboratory & Pharmaceutical Services	Testing	Workcare Reduced \$500			\$2,000.00	\$1,500.00	(\$500.00)	-25.00%	
	J28	Law Enforcement	State Police	MSP Racing Straight Time Moved to IEB			\$388,377.37	\$0.00	(\$388,377.37)	-100.00%	
			State Police	N/A			(\$388,377.37)	\$0.00	\$388,377.37	-100.00%	
	JJ1	Legal Support Services	Stenographer	Hardeman RealTime Moved to Legal			\$5,000.00	\$0.00	(\$5,000.00)	-100.00%	
	JJ2	Auxiliary Services	Autopsies	Uconn Pathology			\$6,000.00	\$6,000.00	\$0.00	0.00%	
			Testing Lab	Industrial Laboratories or alternate lab			\$382,500.00	\$382,500.00	\$0.00	0.00%	
			<b>Obj Class Totals:</b>					<b>\$396,500.00</b>	<b>\$391,000.00</b>	<b>(\$5,500.00)</b>	<b>-1.39%</b>
	LL	EQUIPMENT LEASE-MAINTAIN/REPAR									
	L46	Print, Photocopying & Micrograph Equipment Maint/Repair	Maintenance Contract	K & A Industries--Badge Printer			\$915.00	\$915.00	\$0.00	0.00%	
			<b>Obj Class Totals:</b>					<b>\$915.00</b>	<b>\$915.00</b>	<b>\$0.00</b>	<b>0.00%</b>
	MM	PURCHASED CLIENT/PROGRAM SVCS									
	M03	Purchased Human & Social Services For Clients/Non Medical	Hardship Payments	Economic Hardship Payments--Statutorily Required			\$20,000.00	\$20,000.00	\$0.00	0.00%	
			Legislative Mandate	Jockey's Guild--Statutory Requirement			\$65,000.00	\$65,000.00	\$0.00	0.00%	
	M04	Services Purch Support of Human/Social Services for Clients	ISA	ISA with DPH Compulsive Gambling--Statutory Requirement			\$70,000.00	\$70,000.00	\$0.00	0.00%	
			<b>Obj Class Totals:</b>					<b>\$155,000.00</b>	<b>\$155,000.00</b>	<b>\$0.00</b>	<b>0.00%</b>
	UU	IT Non-Payroll Expenses									
	U02	Telecommunications Services - Voice	Phones	Verizon/AT&T Reduced \$3,000 removed phone lines			\$5,000.00	\$2,000.00	(\$3,000.00)	-60.00%	
	U05	Information Technology (IT) Temp Staff Augmentation Profs	Database	Racing Licensing System Reduced \$3,000			\$5,000.00	\$2,000.00	(\$3,000.00)	-60.00%	
			<b>Obj Class Totals:</b>					<b>\$10,000.00</b>	<b>\$4,000.00</b>	<b>(\$6,000.00)</b>	<b>-60.00%</b>
		<b>Division/Bureau Totals:</b>					<b>\$1,637,622.92</b>	<b>\$1,615,396.56</b>	<b>(\$22,226.36)</b>	<b>-1.36%</b>	
	5000	Investigations and Enforcement Bureau									
	AA	REGULAR EMPLOYEE COMPENSATION									



Approp	Budget Grouping	Division/ Bureau	Object Class	Object_name	Item Short Name	New Description	Current Year Amount	Next Year Amount	Variance	Percent Change
10500003	MGC Mass Racing Development and Oversight									
	MGC Regulatory Costs									
	5000	Investigations and Enforcement Bureau								
	A01	Salaries: Inclusive	Employee Compensation	Admin Employees Salaries			\$51,946.51	\$20,233.39	(\$31,713.12)	-61.05%
	<b>Obj Class Totals:</b>						<b>\$51,946.51</b>	<b>\$20,233.39</b>	<b>(\$31,713.12)</b>	<b>-61.05%</b>
	DD	PENSION & INSURANCE RELATED EX								
	D09	Fringe Benefit Cost Recoupment	Fringe	Fringe rate of 43.36%			\$22,575.95	\$20,233.39	(\$2,342.56)	-10.38%
			Taxes	Tax rate of 2.45%			\$1,272.69	\$8,773.20	\$7,500.51	589.34%
	<b>Obj Class Totals:</b>						<b>\$23,848.64</b>	<b>\$29,006.59</b>	<b>\$5,157.95</b>	<b>21.63%</b>
	<b>Division/Bureau Totals:</b>						<b>\$75,795.15</b>	<b>\$49,239.98</b>	<b>(\$26,555.17)</b>	<b>-35.04%</b>
	7000	Licensing Division								
	AA	REGULAR EMPLOYEE COMPENSATION								
	A01	Salaries: Inclusive	Employee Compensation	Regular Employee Salaries			\$4,719.52	\$5,104.63	\$385.11	8.16%
	<b>Obj Class Totals:</b>						<b>\$4,719.52</b>	<b>\$5,104.63</b>	<b>\$385.11</b>	<b>8.16%</b>
	DD	PENSION & INSURANCE RELATED EX								
	D09	Fringe Benefit Cost Recoupment	Fringe	Fringe rate of 43.36%			\$2,051.10	\$2,213.37	\$162.27	7.91%
			Taxes	Tax rate of 2.45%			\$115.63	\$125.06	\$9.43	8.16%
	<b>Obj Class Totals:</b>						<b>\$2,166.73</b>	<b>\$2,338.43</b>	<b>\$171.70</b>	<b>7.92%</b>
	<b>Division/Bureau Totals:</b>						<b>\$6,886.25</b>	<b>\$7,443.06</b>	<b>\$556.81</b>	<b>8.09%</b>
	All	All Divisions								
	AA	REGULAR EMPLOYEE COMPENSATION								
	A01	Salaries: Inclusive	Employee Compensation	N/A			(\$255,202.49)	\$0.00	\$255,202.49	-100.00%
			Regular Employee Compensation	Turnover Savings 5% of payroll			\$0.00	(\$32,462.40)	(\$32,462.40)	#Div/0!
	<b>Obj Class Totals:</b>						<b>(\$255,202.49)</b>	<b>(\$32,462.40)</b>	<b>\$222,740.09</b>	<b>-87.28%</b>
	DD	PENSION & INSURANCE RELATED EX								
	D09	Fringe Benefit Cost Recoupment	Fringe and Taxes	N/A			(\$116,908.26)	\$0.00	\$116,908.26	-100.00%
	<b>Obj Class Totals:</b>						<b>(\$116,908.26)</b>	<b>\$0.00</b>	<b>\$116,908.26</b>	<b>-100.00%</b>
	<b>Division/Bureau Totals:</b>						<b>(\$372,110.75)</b>	<b>(\$32,462.40)</b>	<b>\$339,648.35</b>	<b>-91.28%</b>
	MGC Regulatory Costs		<b>Totals:</b>				<b>\$1,968,738.82</b>	<b>\$2,011,355.03</b>	<b>\$42,616.21</b>	<b>2.16%</b>

Approp	Budget Grouping	Division/Bureau	Object Class	Object_name	Item Short Name	New Description	Current Year Amount	Next Year Amount	Variance	Percent Change
10500003	MGC Mass Racing Development and Oversight			Indirect						
		2000	MGC Indirect							
			EE	ADMINISTRATIVE EXPENSES						
			E16	Indirect Cost Recoupment	Indirect	N/A	(\$64,357.99)	\$0.00	\$64,357.99	-100.00%
					Indirect Agency Wide	Indirect at 10% of AA, CC, HH, JJ and UU excluding U07	\$204,504.23	\$111,802.56	(\$92,701.67)	-45.33%
				<b>Obj Class Totals:</b>			<b>\$140,146.24</b>	<b>\$111,802.56</b>	<b>(\$28,343.68)</b>	<b>-20.22%</b>
				<b>Division/Bureau Totals:</b>			<b>\$140,146.24</b>	<b>\$111,802.56</b>	<b>(\$28,343.68)</b>	<b>-20.22%</b>
	Indirect			<b>Totals:</b>			<b>\$140,146.24</b>	<b>\$111,802.56</b>	<b>(\$28,343.68)</b>	<b>-20.22%</b>

Approp	Budget Grouping	Division/Bureau	Object Class	Object_name	Item Short Name	New Description	Current Year Amount	Next Year Amount	Variance	Percent Change
10500003	MGC Mass Racing Development and Oversight									
<b>Appropriation Totals</b>							\$2,108,885.06	\$2,123,157.59	\$14,272.53	0.68%
10500004	Community Mitigation									
	MGC Regulatory Costs									
	1100	Human Resources								
	AA	REGULAR EMPLOYEE COMPENSATION								
	A01	Salaries: Inclusive	Raises	3% COLA/Incentives/Equity Agency Wide			\$10,188.69	\$6,612.05	(\$3,576.64)	-35.10%
	<b>Obj Class Totals:</b>						<b>\$10,188.69</b>	<b>\$6,612.05</b>	<b>(\$3,576.64)</b>	<b>-35.10%</b>
	<b>Division/Bureau Totals:</b>						<b>\$10,188.69</b>	<b>\$6,612.05</b>	<b>(\$3,576.64)</b>	<b>-35.10%</b>
	1900	Ombudsman								
	AA	REGULAR EMPLOYEE COMPENSATION								
	A01	Salaries: Inclusive	Employee Compensation	Regular Employee Salaries			\$203,773.74	\$287,568.97	\$83,795.23	41.12%
	<b>Obj Class Totals:</b>						<b>\$203,773.74</b>	<b>\$287,568.97</b>	<b>\$83,795.23</b>	<b>41.12%</b>
	BB	REGULAR EMPLOYEE RELATED EXPEN								
	B01	Other Out Of State Travel - INCLUSIVE: AIRFARE, HOTEL, LODGI	Travel	In-State Travel			\$5,000.00	\$5,000.00	\$0.00	0.00%
	<b>Obj Class Totals:</b>						<b>\$5,000.00</b>	<b>\$5,000.00</b>	<b>\$0.00</b>	<b>0.00%</b>
	DD	PENSION & INSURANCE RELATED EX								
	D09	Fringe Benefit Cost Recoupment	Fringe	Fringe rate of 43.36%			\$88,560.07	\$124,689.90	\$36,129.83	40.80%
			Taxes	Tax rate of 2.45%			\$4,992.46	\$7,045.44	\$2,052.98	41.12%
	<b>Obj Class Totals:</b>						<b>\$93,552.52</b>	<b>\$131,735.34</b>	<b>\$38,182.82</b>	<b>40.81%</b>
	EE	ADMINISTRATIVE EXPENSES								
	E01	Office & Administrative Supplies	Supplies	Supplies Binders			\$2,500.00	\$2,500.00	\$0.00	0.00%
	E16	Indirect Cost Recoupment	Indirect	Indirect Rate of 10%			\$20,377.37	\$0.00	(\$20,377.37)	-100.00%
	<b>Obj Class Totals:</b>						<b>\$22,877.37</b>	<b>\$2,500.00</b>	<b>(\$20,377.37)</b>	<b>-89.07%</b>
	UU	IT Non-Payroll Expenses								
	U07	Information Technology (IT) Equipment	Database	Services Maintenance/Upgrades to Database			\$50,000.00	\$50,000.00	\$0.00	0.00%
	<b>Obj Class Totals:</b>						<b>\$50,000.00</b>	<b>\$50,000.00</b>	<b>\$0.00</b>	<b>0.00%</b>
	<b>Division/Bureau Totals:</b>						<b>\$375,203.63</b>	<b>\$476,804.31</b>	<b>\$101,600.68</b>	<b>27.08%</b>
	MGC Regulatory Costs		<b>Totals:</b>				<b>\$385,392.32</b>	<b>\$483,416.36</b>	<b>\$98,024.04</b>	<b>25.43%</b>

Approp	Budget Grouping	Division/Bureau	Object Class	Object_name	Item Short Name	New Description	Current Year Amount	Next Year Amount	Variance	Percent Change
10500004	Community Mitigation									
<b>Appropriation Totals</b>							<b>\$385,392.32</b>	<b>\$483,416.36</b>	<b>\$98,024.04</b>	<b>25.43%</b>
10501384	Sports Wagering Control Fund									
	MGC Regulatory Costs									
	1000	Finance and Administration								
	AA	REGULAR EMPLOYEE COMPENSATION								
	A01	Salaries: Inclusive	Employee Compensation	Admin Employees Salaries	\$258,721.78	\$295,541.82	\$36,820.04	14.23%		
	<b>Obj Class Totals:</b>				<b>\$258,721.78</b>	<b>\$295,541.82</b>	<b>\$36,820.04</b>	<b>14.23%</b>		
	DD	PENSION & INSURANCE RELATED EX								
	D09	Fringe Benefit Cost Recoupment	Fringe	Fringe rate of 43.36%	\$112,440.49	\$128,146.93	\$15,706.44	13.97%		
			Taxes	Tax rate of 2.45%	\$6,338.68	\$7,240.78	\$902.10	14.23%		
	<b>Obj Class Totals:</b>				<b>\$118,779.17</b>	<b>\$135,387.71</b>	<b>\$16,608.54</b>	<b>13.98%</b>		
	GG	ENERGY COSTS AND SPACE RENTAL								
	G01	Space Rental	Office Lease	101 Federal St. First 6 months \$677,728.64 old lease costs, second 6 months at discount for first year of renewal \$654,850.20, 3 months of old lease for free for renewing 5 years (\$333,864.32). Total FY 25 Lease costs \$988,714.52. 70% to Gaming--\$692,1	\$378,375.22	\$296,614.36	(\$81,760.86)	-21.61%		
	G03	Electricity	Electricity	101 Federal St. 12 months	\$9,301.10	\$9,301.10	\$0.00	0.00%		
	<b>Obj Class Totals:</b>				<b>\$387,676.32</b>	<b>\$305,915.46</b>	<b>(\$81,760.86)</b>	<b>-21.09%</b>		
	UU	IT Non-Payroll Expenses								
	U03	Software & Information Technology Licenses (IT)	Software	Software - LinkSquares CLM	\$14,250.00	\$14,250.00	\$0.00	0.00%		
	<b>Obj Class Totals:</b>				<b>\$14,250.00</b>	<b>\$14,250.00</b>	<b>\$0.00</b>	<b>0.00%</b>		
	<b>Division/Bureau Totals:</b>				<b>\$779,427.27</b>	<b>\$751,094.99</b>	<b>(\$28,332.28)</b>	<b>-3.64%</b>		
	1100	Human Resources								
	AA	REGULAR EMPLOYEE COMPENSATION								
	A01	Salaries: Inclusive	Employee Compensation	HR Employees Salaries	\$159,116.73	\$212,887.49	\$53,770.76	33.79%		
			Merit Increases	Intern Program that Could Provide Up to 2 regular and 1 graduate intern	\$0.00	\$37,500.00	\$37,500.00	#Div/0!		
			Raises	3% COLA/Incentives/Equity Agency Wide	\$151,408.94	\$113,569.85	(\$37,839.09)	-24.99%		
	<b>Obj Class Totals:</b>				<b>\$310,525.67</b>	<b>\$363,957.34</b>	<b>\$53,431.67</b>	<b>17.21%</b>		
	CC	SPECIAL EMPLOYEES								
	C23	Management, Business Professionals & Admin Services	Contract Employee	Administrative Help	\$22,800.00	\$24,000.00	\$1,200.00	5.26%		
	<b>Obj Class Totals:</b>				<b>\$22,800.00</b>	<b>\$24,000.00</b>	<b>\$1,200.00</b>	<b>5.26%</b>		
	DD	PENSION & INSURANCE RELATED EX								
	D09	Fringe Benefit Cost Recoupment	Fringe	Fringe rate of 43.36%	\$69,152.13	\$92,308.02	\$23,155.89	33.49%		

Approp	Budget Grouping	Division/Bureau	Object Class	Object_name	Item Short Name	New Description	Current Year Amount	Next Year Amount	Variance	Percent Change
10501384	Sports Wagering Control Fund									
	MGC Regulatory Costs									
		1100	Human Resources							
		D09	Fringe Benefit Cost Recoupment		Taxes	Tax rate of 2.45%	\$3,898.36	\$5,215.74	\$1,317.38	33.79%
			<b>Obj Class Totals:</b>				<b>\$73,050.49</b>	<b>\$97,523.76</b>	<b>\$24,473.27</b>	<b>33.50%</b>
		UU	IT Non-Payroll Expenses							
		U03	Software & Information Technology Licenses (IT)		Software	Software - BambooHR	\$4,275.00	\$0.00	(\$4,275.00)	-100.00%
			<b>Obj Class Totals:</b>				<b>\$4,275.00</b>	<b>\$0.00</b>	<b>(\$4,275.00)</b>	<b>-100.00%</b>
			<b>Division/Bureau Totals:</b>				<b>\$410,651.16</b>	<b>\$485,481.10</b>	<b>\$74,829.94</b>	<b>18.22%</b>
		1200	Legal							
		AA	REGULAR EMPLOYEE COMPENSATION							
		A01	Salaries: Inclusive		Employee Compensation	Legal Employees Salaries	\$256,648.70	\$286,841.38	\$30,192.68	11.76%
			<b>Obj Class Totals:</b>				<b>\$256,648.70</b>	<b>\$286,841.38</b>	<b>\$30,192.68</b>	<b>11.76%</b>
		DD	PENSION & INSURANCE RELATED EX							
		D09	Fringe Benefit Cost Recoupment		Fringe	Fringe rate of 43.36%	\$102,182.68	\$124,374.42	\$22,191.74	21.72%
					Taxes	Tax rate of 2.45%	\$5,764.21	\$7,027.61	\$1,263.40	21.92%
			<b>Obj Class Totals:</b>				<b>\$107,946.90</b>	<b>\$131,402.03</b>	<b>\$23,455.13</b>	<b>21.73%</b>
		HH	CONSULTANT SVCS (TO DEPTS)							
		H09	Attorneys/Legal Services		Outside Counsel	Outside Counsel - A&K	\$200,000.00	\$200,000.00	\$0.00	0.00%
			<b>Obj Class Totals:</b>				<b>\$200,000.00</b>	<b>\$200,000.00</b>	<b>\$0.00</b>	<b>0.00%</b>
		UU	IT Non-Payroll Expenses							
		U03	Software & Information Technology Licenses (IT)		Software	Relativity Document Search and PIR Tool Replacement for Relativity	\$155,000.00	\$155,000.00	\$0.00	0.00%
			<b>Obj Class Totals:</b>				<b>\$155,000.00</b>	<b>\$155,000.00</b>	<b>\$0.00</b>	<b>0.00%</b>
			<b>Division/Bureau Totals:</b>				<b>\$719,595.60</b>	<b>\$773,243.41</b>	<b>\$53,647.81</b>	<b>7.46%</b>
		1300	Executive Director							
		AA	REGULAR EMPLOYEE COMPENSATION							
		A01	Salaries: Inclusive		Employee Compensation	Exec. Dir. Employees Salaries	\$168,424.97	\$161,743.18	(\$6,681.79)	-3.97%
			<b>Obj Class Totals:</b>				<b>\$168,424.97</b>	<b>\$161,743.18</b>	<b>(\$6,681.79)</b>	<b>-3.97%</b>
		DD	PENSION & INSURANCE RELATED EX							
		D09	Fringe Benefit Cost Recoupment		Fringe	Fringe rate of 43.36%	\$59,647.12	\$86,117.44	\$26,470.32	44.38%
					Taxes	Tax rate of 2.45%	\$3,362.53	(\$12,022.90)	(\$15,385.43)	-457.56%
			<b>Obj Class Totals:</b>				<b>\$63,009.64</b>	<b>\$74,094.54</b>	<b>\$11,084.90</b>	<b>17.59%</b>
		OO								
		O99			Consulting and Payroll	N/A	(\$431,061.33)	\$0.00	\$431,061.33	-100.00%

Approp	Budget Grouping	Division/Bureau	Object Class	Object_name	Item Short Name	New Description	Current Year Amount	Next Year Amount	Variance	Percent Change
10501384	Sports Wagering Control Fund									
	MGC Regulatory Costs									
	1300	Executive Director								
		O99			Consulting and Payroll	Sports Wagering Set Aside for FY24 Build Out of SW Regulatory Environment	\$750,000.00	\$0.00	(\$750,000.00)	-100.00%
		<b>Obj Class Totals:</b>					<b>\$318,938.67</b>	<b>\$0.00</b>	<b>(\$318,938.67)</b>	<b>-100.00%</b>
	<b>Division/Bureau Totals:</b>						<b>\$550,373.28</b>	<b>\$235,837.72</b>	<b>(\$314,535.56)</b>	<b>-57.15%</b>
	1400	Information Technology								
	AA	REGULAR EMPLOYEE COMPENSATION								
	A01	Salaries: Inclusive	Employee Compensation	IT Employees Salaries			\$663,359.59	\$809,995.31	\$146,635.72	22.11%
		<b>Obj Class Totals:</b>					<b>\$663,359.59</b>	<b>\$809,995.31</b>	<b>\$146,635.72</b>	<b>22.11%</b>
	DD	PENSION & INSURANCE RELATED EX								
	D09	Fringe Benefit Cost Recoupment	Fringe	Fringe rate of 43.36%			\$288,267.92	\$351,213.97	\$62,946.05	21.84%
			Taxes	Tax rate of 2.45%			\$16,252.31	\$19,844.89	\$3,592.58	22.11%
		<b>Obj Class Totals:</b>					<b>\$304,520.23</b>	<b>\$371,058.86</b>	<b>\$66,538.63</b>	<b>21.85%</b>
	UU	IT Non-Payroll Expenses								
	U02	Telecommunications Services - Voice	TELECOMMUNICAT IONS SERVICES - VOICE	OfficeSuite (Voice, HD Meeting, WeConnect), Verizon Wireless, Multi-location fax lines			\$32,122.38	\$32,122.38	\$0.00	0.00%
	U03	Software & Information Technology Licenses (IT)	SOFTWARE & INFORMATION TECHNOLOGY LICENSES (IT)	Increase \$86,671.56 for Azure Sentinel, M365 G5 Compliance, M365 G5 Security Adobe, Sharepoint, O365, Azure, JIRA, MDM etc			\$154,464.88	\$154,464.88	\$0.00	0.00%
	U06	Information Technology (IT) Cabling	IT Cabling	Raynham Build out			\$54,531.48	\$54,531.48	\$0.00	0.00%
			IT Cabling	Suffolk Build out new \$26,050.08 in one time costs Suffolk Build out			\$54,531.48	\$54,531.48	\$0.00	0.00%
	U07	Information Technology (IT) Equipment	IT Equipment	IT Equipment, emergency replacements (switches, routers, firewalls) etc			\$41,325.00	\$41,325.00	\$0.00	0.00%
	U09	Information Technology (IT) Equip Rental Or Lease	INFORMATION TECHNOLOGY (IT) EQUIP RENTAL OR LEASE	ACS Leases (Refresh)			\$35,823.08	\$35,823.08	\$0.01	0.00%
	U10	Information Tech (IT) Equipment Maintenance & Repair	IT Maintenance and Repair	Annual M&S Equipment/Services			\$37,563.79	\$37,563.79	\$0.00	0.00%
	U11	Information Technology (IT) Contract Services	IT Contract Services	LMS, Gartner, Tallan Services			\$77,239.85	\$77,239.85	\$0.01	0.00%
		<b>Obj Class Totals:</b>					<b>\$487,601.93</b>	<b>\$487,601.94</b>	<b>\$0.01</b>	<b>0.00%</b>
	<b>Division/Bureau Totals:</b>						<b>\$1,455,481.75</b>	<b>\$1,668,656.11</b>	<b>\$213,174.36</b>	<b>14.65%</b>
	1500	Commissioners								
	AA	REGULAR EMPLOYEE COMPENSATION								

Approp	Budget Grouping	Division/Bureau	Object Class	Object_name	Item Short Name	New Description	Current Year Amount	Next Year Amount	Variance	Percent Change
10501384	Sports Wagering Control Fund									
	MGC Regulatory Costs									
	1500	Commissioners								
		A01	Salaries: Inclusive		Employee Compensation	Commissioners Employees Salaries	\$261,058.70	\$312,802.90	\$51,744.20	19.82%
			<b>Obj Class Totals:</b>				<b>\$261,058.70</b>	<b>\$312,802.90</b>	<b>\$51,744.20</b>	<b>19.82%</b>
		DD	PENSION & INSURANCE RELATED EX							
		D09	Fringe Benefit Cost Recoupment		Fringe	Fringe rate of 43.36%	\$113,456.11	\$135,631.34	\$22,175.23	19.55%
					Taxes	Tax rate of 2.45%	\$6,395.94	\$7,663.67	\$1,267.73	19.82%
			<b>Obj Class Totals:</b>				<b>\$119,852.05</b>	<b>\$143,295.01</b>	<b>\$23,442.96</b>	<b>19.56%</b>
		GG	ENERGY COSTS AND SPACE RENTAL							
		G01	Space Rental		75-101 Parking Garage	Parking 75-101--5 spaces. Two of the spaces are included in the lease. This item pays for 3 of the spaces.	\$5,437.80	\$5,437.80	\$0.00	0.00%
			<b>Obj Class Totals:</b>				<b>\$5,437.80</b>	<b>\$5,437.80</b>	<b>\$0.00</b>	<b>0.00%</b>
			<b>Division/Bureau Totals:</b>				<b>\$386,348.55</b>	<b>\$461,535.71</b>	<b>\$75,187.16</b>	<b>19.46%</b>
	1800	Communications								
		AA	REGULAR EMPLOYEE COMPENSATION							
		A01	Salaries: Inclusive		Employee Compensation	Communications Employees Salaries	\$63,096.99	\$91,587.60	\$28,490.61	45.15%
			<b>Obj Class Totals:</b>				<b>\$63,096.99</b>	<b>\$91,587.60</b>	<b>\$28,490.61</b>	<b>45.15%</b>
		DD	PENSION & INSURANCE RELATED EX							
		D09	Fringe Benefit Cost Recoupment		Fringe	Fringe rate of 43.36%	\$27,421.95	\$39,712.37	\$12,290.42	44.82%
					Taxes	Tax rate of 2.45%	\$1,545.88	\$2,243.90	\$698.02	45.15%
			<b>Obj Class Totals:</b>				<b>\$28,967.83</b>	<b>\$41,956.27</b>	<b>\$12,988.44</b>	<b>44.84%</b>
			<b>Division/Bureau Totals:</b>				<b>\$92,064.82</b>	<b>\$133,543.87</b>	<b>\$41,479.05</b>	<b>45.05%</b>
	5000	Investigations and Enforcement Bureau								
		AA	REGULAR EMPLOYEE COMPENSATION							
		A01	Salaries: Inclusive		Employee Compensation	Admin Employees Salaries	\$769,907.29	\$1,120,577.07	\$350,669.78	45.55%
			<b>Obj Class Totals:</b>				<b>\$769,907.29</b>	<b>\$1,120,577.07</b>	<b>\$350,669.78</b>	<b>45.55%</b>
		BB	REGULAR EMPLOYEE RELATED EXPEN							
		B01	Other Out Of State Travel - INCLUSIVE: AIRFARE, HOTEL, LODGI		Travel	Out of State Travel Costs for Sports Wagering	\$0.00	\$10,000.00	\$10,000.00	#Div/0!
			<b>Obj Class Totals:</b>				<b>\$0.00</b>	<b>\$10,000.00</b>	<b>\$10,000.00</b>	<b>#Div/0!</b>
		CC	SPECIAL EMPLOYEES							
		C23	Management, Business Professionals & Admin Services		Contract Employee	Civilian Investigators	\$124,800.00	\$130,000.00	\$5,200.00	4.17%
			<b>Obj Class Totals:</b>				<b>\$124,800.00</b>	<b>\$130,000.00</b>	<b>\$5,200.00</b>	<b>4.17%</b>
		DD	PENSION & INSURANCE RELATED EX							
		D09	Fringe Benefit Cost Recoupment		Fringe	Fringe rate of 43.36%	\$47,499.76	\$485,882.22	\$438,382.46	922.92%

Approp	Budget Grouping	Division/ Bureau	Object Class	Object_name	Item Short Name	New Description	Current Year Amount	Next Year Amount	Variance	Percent Change
10501384	Sports Wagering Control Fund									
	MGC Regulatory Costs									
	5000	Investigations and Enforcement Bureau								
		D09	Fringe Benefit Cost Recoupment		Taxes	Tax rate of 2.45%	\$305,894.71	\$27,454.14	(\$278,440.57)	-91.02%
					Taxes	Tax rate of 2.45% on Civilian Investigators	\$3,057.60	\$2,697.35	(\$360.25)	-11.78%
					<b>Obj Class Totals:</b>		<b>\$356,452.07</b>	<b>\$516,033.71</b>	<b>\$159,581.64</b>	<b>44.77%</b>
		EE	ADMINISTRATIVE EXPENSES							
		E41	Out Of State Travel Expen on Behalf of State Employ		Travel Agent	Travel for Sports Wagering	\$0.00	\$35,000.00	\$35,000.00	#Div/0!
		EE2	Conference, Training and Registration Fees		Conferences	Conferences for Sports Wagering	\$0.00	\$15,000.00	\$15,000.00	#Div/0!
					<b>Obj Class Totals:</b>		<b>\$0.00</b>	<b>\$50,000.00</b>	<b>\$50,000.00</b>	<b>#Div/0!</b>
		HH	CONSULTANT SVCS (TO DEPTS)							
		HH1	Financial Services		Consultants	Consultants -RSM	\$622,297.00	\$0.00	(\$622,297.00)	-100.00%
					Consultants	Consultants -RSM--Vendor License Reviews for Sports Wagering	\$750,000.00	\$1,242,214.29	\$492,214.29	65.63%
					<b>Obj Class Totals:</b>		<b>\$1,372,297.00</b>	<b>\$1,242,214.29</b>	<b>(\$130,082.71)</b>	<b>-9.48%</b>
		JJ	OPERATIONAL SERVICES							
		J25	Laboratory & Pharmaceutical Services		State Police	adjust down to 4 additional FTE related to Sports Wagering	\$0.00	\$461,595.28	\$461,595.28	#Div/0!
					State Police	shifted costs to 4 additional trooper for Sports Wagering	(\$250,000.00)	\$0.00	\$250,000.00	-100.00%
					State Police	shifted costs to 4 additional trooper for Sports Wagering	\$541,519.27	\$0.00	(\$541,519.27)	-100.00%
					<b>Obj Class Totals:</b>		<b>\$291,519.27</b>	<b>\$461,595.28</b>	<b>\$170,076.01</b>	<b>58.34%</b>
					<b>Division/Bureau Totals:</b>		<b>\$2,914,975.63</b>	<b>\$3,530,420.35</b>	<b>\$615,444.72</b>	<b>21.11%</b>
	5500	Sports Wagering								
		AA	REGULAR EMPLOYEE COMPENSATION							
		A01	Salaries: Inclusive		Employee Compensation	N/A	\$213,333.33	\$0.00	(\$213,333.33)	-100.00%
					Employee Compensation	Regular Employee Salaries	\$631,101.39	\$937,652.92	\$306,551.53	48.57%
					<b>Obj Class Totals:</b>		<b>\$844,434.72</b>	<b>\$937,652.92</b>	<b>\$93,218.20</b>	<b>11.04%</b>
		BB	REGULAR EMPLOYEE RELATED EXPEN							
		B01	Other Out Of State Travel - INCLUSIVE: AIRFARE, HOTEL, LODGI		Out of State Travel	Out of State Licensee Visits and Conferences increase for extra FTEs	\$4,000.00	\$5,500.00	\$1,500.00	37.50%
		B02	In-State Travel		In-State Travel	Licensee visits, in-state meetings and conferences Mileage Reimbursements	\$3,000.00	\$3,000.00	\$0.00	0.00%
					<b>Obj Class Totals:</b>		<b>\$7,000.00</b>	<b>\$8,500.00</b>	<b>\$1,500.00</b>	<b>21.43%</b>
		DD	PENSION & INSURANCE RELATED EX							
		D09	Fringe Benefit Cost Recoupment		Fringe	Fringe rate of 43.36%	\$274,106.66	\$406,566.31	\$132,459.65	48.32%
					Fringe and Taxes	N/A	\$97,728.00	\$0.00	(\$97,728.00)	-100.00%



Approp	Budget Grouping	Division/ Bureau	Object Class	Object_name	Item Short Name	New Description	Current Year Amount	Next Year Amount	Variance	Percent Change
10501384	Sports Wagering Control Fund									
	MGC Regulatory Costs									
	5500	Sports Wagering								
	D09	Fringe Benefit Cost Recoupment	Taxes		Tax rate of 2.45%		\$15,461.99	\$22,972.50	\$7,510.52	48.57%
		<b>Obj Class Totals:</b>					<b>\$387,296.65</b>	<b>\$429,538.81</b>	<b>\$42,242.16</b>	<b>10.91%</b>
	EE	ADMINISTRATIVE EXPENSES								
	E02	Printing Expenses & Supplies	Printing & Administrative Supplies		SW Reports and Ad Hoc Reports Additional \$500 for Reporting		\$1,500.00	\$2,000.00	\$500.00	33.33%
	E12	Subscriptions, Memberships & Licensing Fees	Subscriptions, Memberships & Licensing Fees		SBRA membership, trade journals other subscriptions		\$7,500.00	\$7,500.00	\$0.00	0.00%
	E30	Credit Card Purchases	Credit Card Purchases		Credit Card Purchases		\$5,000.00	\$5,000.00	\$0.00	0.00%
	E41	Out Of State Travel Expen on Behalf of State Employ	Travel Agent		Travel Agency Fees increase for additional FTEs		\$8,000.00	\$13,000.00	\$5,000.00	62.50%
	EE2	Conference, Training and Registration Fees	Conference, Training and Registration Fees		UNLV; G2E; NAGRA or SBRA meeting, GLI Roundtables Increase 2,000 for additional FTEs		\$12,500.00	\$14,850.00	\$2,350.00	18.80%
		<b>Obj Class Totals:</b>					<b>\$34,500.00</b>	<b>\$42,350.00</b>	<b>\$7,850.00</b>	<b>22.75%</b>
	HH	CONSULTANT SVCS (TO DEPTS)								
	H23	Program Coordinators	Consultant		Marketing Audit Consultant		\$0.00	\$20,000.00	\$20,000.00	#Div/0!
			Consultants		N/A		\$120,000.00	\$0.00	(\$120,000.00)	-100.00%
		<b>Obj Class Totals:</b>					<b>\$120,000.00</b>	<b>\$20,000.00</b>	<b>(\$100,000.00)</b>	<b>-83.33%</b>
	UU	IT Non-Payroll Expenses								
	U03	Software & Information Technology Licenses (IT)	software		Incident Tracker Increase for actual cost of @5,000 plus additional modifications		\$3,800.00	\$10,500.00	\$6,700.00	176.32%
	U05	Information Technology (IT) Temp Staff Augmentation Profs	IT Consultant		IT Consultant - GLI		\$60,000.00	\$60,000.00	\$0.00	0.00%
			IT Consultant		IT Consultant - GLI - ICS		\$0.00	\$40,000.00	\$40,000.00	#Div/0!
		<b>Obj Class Totals:</b>					<b>\$63,800.00</b>	<b>\$110,500.00</b>	<b>\$46,700.00</b>	<b>73.20%</b>
		<b>Division/Bureau Totals:</b>					<b>\$1,457,031.37</b>	<b>\$1,548,541.73</b>	<b>\$91,510.36</b>	<b>6.28%</b>
	7000	Licensing Division								
	AA	REGULAR EMPLOYEE COMPENSATION								
	A01	Salaries: Inclusive	Employee Compensation		Regular Employee Salaries		\$184,707.70	\$346,909.48	\$162,201.78	87.82%
		<b>Obj Class Totals:</b>					<b>\$184,707.70</b>	<b>\$346,909.48</b>	<b>\$162,201.78</b>	<b>87.82%</b>
	DD	PENSION & INSURANCE RELATED EX								
	D09	Fringe Benefit Cost Recoupment	Fringe		Fringe rate of 43.36%		\$4,525.34	\$150,419.95	\$145,894.61	3223.95%
			Taxes		Tax rate of 2.45%		\$80,273.97	\$8,499.28	(\$71,774.69)	-89.41%
		<b>Obj Class Totals:</b>					<b>\$84,799.31</b>	<b>\$158,919.23</b>	<b>\$74,119.93</b>	<b>87.41%</b>
	UU	IT Non-Payroll Expenses								

Approp	Budget Grouping	Division/Bureau	Object Class	Object_name	Item Short Name	New Description	Current Year Amount	Next Year Amount	Variance	Percent Change
10501384	Sports Wagering Control Fund									
	MGC Regulatory Costs									
	7000	Licensing Division								
		U03	Software & Information Technology Licenses (IT)	Software	Licensing System Software		\$0.00	\$150,000.00	\$150,000.00	#Div/0!
		U11	Information Technology (IT) Contract Services	IT Consultant	Licensing System Implementation		\$0.00	\$112,500.00	\$112,500.00	#Div/0!
			<b>Obj Class Totals:</b>				<b>\$0.00</b>	<b>\$262,500.00</b>	<b>\$262,500.00</b>	<b>#Div/0!</b>
			<b>Division/Bureau Totals:</b>				<b>\$269,507.01</b>	<b>\$768,328.71</b>	<b>\$498,821.71</b>	<b>185.09%</b>
	All	All Divisions								
	AA	REGULAR EMPLOYEE COMPENSATION								
	A01	Salaries: Inclusive		Employee Compensation	N/A		\$86,016.58	\$0.00	(\$86,016.58)	-100.00%
				Regular Employee Compensation	Turnover Savings 5% of payroll		\$0.00	(\$194,961.58)	(\$194,961.58)	#Div/0!
			<b>Obj Class Totals:</b>				<b>\$86,016.58</b>	<b>(\$194,961.58)</b>	<b>(\$280,978.16)</b>	<b>-326.66%</b>
	DD	PENSION & INSURANCE RELATED EX								
	D09	Fringe Benefit Cost Recoupment		Fringe and Payroll Taxes	Fringe and Payroll Taxes on Turnover Savings (45.81%)		\$0.00	(\$89,311.90)	(\$89,311.90)	#Div/0!
				Fringe and Taxes	N/A		\$39,404.19	\$0.00	(\$39,404.19)	-100.00%
			<b>Obj Class Totals:</b>				<b>\$39,404.19</b>	<b>(\$89,311.90)</b>	<b>(\$128,716.09)</b>	<b>-326.66%</b>
			<b>Division/Bureau Totals:</b>				<b>\$125,420.77</b>	<b>(\$284,273.48)</b>	<b>(\$409,694.25)</b>	<b>-326.66%</b>
	MGC Regulatory Costs		<b>Totals:</b>				<b>\$9,160,877.19</b>	<b>\$10,072,410.22</b>	<b>\$911,533.03</b>	<b>9.95%</b>

Approp	Budget Grouping	Division/Bureau	Object Class	Object_name	Item Short Name	New Description	Current Year Amount	Next Year Amount	Variance	Percent Change
10501384	Sports Wagering Control Fund									
	Indirect									
		2000	MGC	Indirect						
			EE	ADMINISTRATIVE EXPENSES						
			E16	Indirect Cost Recoupment	Indirect	Commonwealth Required Indirect Cost Recoupment	\$440,545.25	\$520,356.13	\$79,810.88	18.12%
					Indirect	N/A	\$37,229.70	\$0.00	(\$37,229.70)	-100.00%
			<b>Obj Class Totals:</b>				<b>\$477,774.95</b>	<b>\$520,356.13</b>	<b>\$42,581.18</b>	<b>8.91%</b>
			<b>Division/Bureau Totals:</b>				<b>\$477,774.95</b>	<b>\$520,356.13</b>	<b>\$42,581.18</b>	<b>8.91%</b>
	Indirect			<b>Totals:</b>			<b>\$477,774.95</b>	<b>\$520,356.13</b>	<b>\$42,581.18</b>	<b>8.91%</b>

Approp	Budget Grouping	Division/Bureau	Object Class	Object_name	Item Short Name	New Description	Current Year Amount	Next Year Amount	Variance	Percent Change	
10501384	Sports Wagering Control Fund										
				Research and Responsible Gaming/PHTF							
			1700	Problem Gambling							
				UU	IT Non-Payroll Expenses						
				U03	Software & Information Technology Licenses (IT)	software	100 VSE database licenses	\$12,100.00	\$12,100.00	\$0.00	0.00%
				<b>Obj Class Totals:</b>			\$12,100.00	\$12,100.00	\$0.00	0.00%	
			<b>Division/Bureau Totals:</b>			\$12,100.00	\$12,100.00	\$0.00	0.00%		
			Research and Responsible Gaming/PHTF	<b>Totals:</b>			\$12,100.00	\$12,100.00	\$0.00	0.00%	

Approp	Budget Grouping	Division/Bureau	Object Class	Object_name	Item Short Name	New Description	Current Year Amount	Next Year Amount	Variance	Percent Change
10501384	Sports Wagering Control Fund									
	Office of Attorney General and AGO MSP									
		9000	Office of the Attorney General							
			OO							
			O99		Attorney General	SW ISA with AGO for Enforcement Activities	\$500,000.00	\$500,000.00	\$0.00	0.00%
			<b>Obj Class Totals:</b>				<b>\$500,000.00</b>	<b>\$500,000.00</b>	<b>\$0.00</b>	<b>0.00%</b>
			<b>Division/Bureau Totals:</b>				<b>\$500,000.00</b>	<b>\$500,000.00</b>	<b>\$0.00</b>	<b>0.00%</b>
	Office of Attorney General and AGO MSP		<b>Totals:</b>				<b>\$500,000.00</b>	<b>\$500,000.00</b>	<b>\$0.00</b>	<b>0.00%</b>

Approp	Budget Grouping	Division/Bureau	Object Class	Object_name	Item Short Name	New Description	Current Year Amount	Next Year Amount	Variance	Percent Change	
10501384	Sports Wagering Control Fund										
<b>Appropriation Totals</b>							\$10,150,752.14	\$11,104,866.35	\$954,114.21	9.40%	
40001101											
	MGC Regulatory Costs										
	1100	Human Resources									
		AA	REGULAR EMPLOYEE COMPENSATION								
		A01	Salaries: Inclusive	Raises	3% COLA/Incentives/Equity Agency Wide			\$15,951.45	\$10,733.14	(\$5,218.31)	-32.71%
		<b>Obj Class Totals:</b>					\$15,951.45	\$10,733.14	(\$5,218.31)	-32.71%	
	<b>Division/Bureau Totals:</b>						\$15,951.45	\$10,733.14	(\$5,218.31)	-32.71%	
	MGC Regulatory Costs		<b>Totals:</b>					\$15,951.45	\$10,733.14	(\$5,218.31)	-32.71%

Approp	Budget Grouping	Division/ Bureau	Object Class	Object_name	Item Short Name	New Description	Current Year Amount	Next Year Amount	Variance	Percent Change
40001101										
				<b>Research and Responsible Gaming/PHTF</b>						
			<b>1700</b>	<b>Problem Gambling</b>						
			AA	REGULAR EMPLOYEE COMPENSATION						
			A01	Salaries: Inclusive	Employee Compensation	Employee Salaries Possible Intern	\$319,029.04	\$357,771.35	\$38,742.31	12.14%
				<b>Obj Class Totals:</b>			<b>\$319,029.04</b>	<b>\$357,771.35</b>	<b>\$38,742.31</b>	<b>12.14%</b>
			BB	REGULAR EMPLOYEE RELATED EXPEN						
			B01	Other Out Of State Travel - INCLUSIVE: AIRFARE, HOTEL, LODGI	Travel	Out of State Travel	\$1,250.00	\$1,250.00	\$0.00	0.00%
			B02	In-State Travel	Travel	In-State-Travel Reimbursements	\$6,000.00	\$6,000.00	\$0.00	0.00%
				<b>Obj Class Totals:</b>			<b>\$7,250.00</b>	<b>\$7,250.00</b>	<b>\$0.00</b>	<b>0.00%</b>
			DD	PENSION & INSURANCE RELATED EX						
			D09	Fringe Benefit Cost Recoupment	Fringe	Fringe rate of 43.36%	\$138,650.02	\$155,129.66	\$16,479.64	11.89%
					Taxes	Tax rate of 2.45%	\$7,816.21	\$8,765.40	\$949.19	12.14%
				<b>Obj Class Totals:</b>			<b>\$146,466.23</b>	<b>\$163,895.06</b>	<b>\$17,428.83</b>	<b>11.90%</b>
			EE	ADMINISTRATIVE EXPENSES						
			E02	Printing Expenses & Supplies	Printing Expenses and Supplies	Printed Materials for Game Sense	\$6,000.00	\$6,000.00	\$0.00	0.00%
			E12	Subscriptions, Memberships & Licensing Fees	Memberships	Memberships - NAADGS, NCPG	\$6,000.00	\$6,000.00	\$0.00	0.00%
			E16	Indirect Cost Recoupment	Indirect Charges	Indirect to EHHS	\$398,902.90	\$403,850.43	\$4,947.53	1.24%
			EE2	Conference, Training and Registration Fees	Conferences	Conference, Training & Registration Fees	\$10,000.00	\$10,000.00	\$0.00	0.00%
				<b>Obj Class Totals:</b>			<b>\$420,902.90</b>	<b>\$425,850.43</b>	<b>\$4,947.53</b>	<b>1.18%</b>
			FF	FACILITY OPERATIONAL EXPENSES						
			F16	Library & Teaching Supplies & Materials	Books	Library/reference books Increase as needed for research	\$1,000.00	\$1,000.00	\$0.00	0.00%
				<b>Obj Class Totals:</b>			<b>\$1,000.00</b>	<b>\$1,000.00</b>	<b>\$0.00</b>	<b>0.00%</b>
			HH	CONSULTANT SVCS (TO DEPTS)						
			H09	Attorneys/Legal Services	Public Safety Research	Public Safety and Human Trafficking Research	\$115,000.00	\$115,000.00	\$0.00	0.00%
			H23	Program Coordinators	Branding	GameSense media buys etc. ASG	\$150,000.00	\$150,000.00	\$0.00	0.00%
					Mass Council	Mass Council on Gaming & Health including employees to man Game Sense booth at PPC EBH and MGM --Staffed 16 hrs per day PPC and MGM, and 24 Hrs/day EBH --VSE --Play My Way --Required by Statute Chapter 194, Section 9	\$3,148,000.00	\$3,148,000.00	\$0.00	0.00%
					Program manager	RG Evaluation including GameSense	\$125,000.00	\$125,000.00	\$0.00	0.00%
					Research Consultant	Research Review Committee	\$30,000.00	\$30,000.00	\$0.00	0.00%

Approp	Budget Grouping	Division/Bureau	Object Class	Object_name	Item Short Name	New Description	Current Year Amount	Next Year Amount	Variance	Percent Change	
40001101											
			<b>Research and Responsible Gaming/PHTF</b>								
			<b>1700</b>	<b>Problem Gambling</b>							
			H23	Program Coordinators	Translations	Knowledge Translation and Exchange	\$25,000.00	\$25,000.00	\$0.00	0.00%	
					VSE Resource Liaison	VSE Resource Liaison	\$62,000.00	\$62,000.00	\$0.00	0.00%	
			<b>Obj Class Totals:</b>					<b>\$3,655,000.00</b>	<b>\$3,655,000.00</b>	<b>\$0.00</b>	<b>0.00%</b>
			JJ	<i>OPERATIONAL SERVICES</i>							
			JJ2	Auxiliary Services	Translations	Document Translations Increase due to greater need for translation and diversity	\$15,000.00	\$15,000.00	\$0.00	0.00%	
			<b>Obj Class Totals:</b>					<b>\$15,000.00</b>	<b>\$15,000.00</b>	<b>\$0.00</b>	<b>0.00%</b>
			PP	<i>STATE AID/POL SUB</i>							
			P01	Grants To Public Entities	Community Driven Research	Community Driven Research	\$210,000.00	\$210,000.00	\$0.00	0.00%	
					Data Storage Grant	MODE DPH	\$75,000.00	\$75,000.00	\$0.00	0.00%	
					SEIGMA	Social & Economic Research(SEIGMA) Follow-up General Population Study	\$995,000.00	\$995,000.00	\$0.00	0.00%	
			PP1	Grants To Non-Public Entities	PMW	Play My Way Incentives	\$40,000.00	\$40,000.00	\$0.00	0.00%	
			<b>Obj Class Totals:</b>					<b>\$1,320,000.00</b>	<b>\$1,320,000.00</b>	<b>\$0.00</b>	<b>0.00%</b>
			<b>Division/Bureau Totals:</b>					<b>\$5,884,648.17</b>	<b>\$5,945,766.84</b>	<b>\$61,118.67</b>	<b>1.04%</b>
			<b>Research and Responsible Gaming/PHTF Totals:</b>					<b>\$5,884,648.17</b>	<b>\$5,945,766.84</b>	<b>\$61,118.67</b>	<b>1.04%</b>



Approp	Budget Grouping	Division/ Bureau	Object Class	Object_name	Item Short Name	New Description	Current Year Amount	Next Year Amount	Variance	Percent Change
40001101										
<b>Appropriation Totals</b>							\$5,900,599.62	\$5,956,499.98	\$55,900.36	0.95%

# Next Year Budget By Object Class for Commission

Approp	Budget Grouping	Obj Class	Object_name	Unit	Item Short Name	New Description	Current Year Amount	Next Year Amount	Variance	Percent Change
10500001	Mass. Gaming Commission									
			MGC Regulatory Costs							
		AA	REGULAR EMPLOYEE COMPENSATION							
		A01	Salaries: Inclusive	1000	Employee Compensation	Employee Salaries	\$493,065.26	\$536,457.62	\$43,392.36	8.80%
				1100	Employee Compensation	Employee Salaries	\$411,669.92	\$416,703.07	\$5,033.15	1.22%
				1100	Merit Increases	Intern Program that Could Provide Up to 2 regular and 1 graduate intern	\$0.00	\$87,500.00	\$87,500.00	#Div/0!
				1100	Raises	3% COLA/Incentives/Equity Agency Wide	\$373,232.00	\$281,184.27	(\$92,047.73)	-24.66%
				1200	Employee Compensation	Employee Salaries	\$585,339.16	\$640,612.40	\$55,273.24	9.44%
				1300	Employee Compensation	Employee Salaries	\$384,127.12	\$375,463.96	(\$8,663.16)	-2.26%
				1400	Employee Compensation	Employee Salaries	\$1,039,345.34	\$1,291,486.17	\$252,140.83	24.26%
				1500	Employee Compensation	Employee Compensation	\$595,397.04	\$698,593.14	\$103,196.10	17.33%
				1800	Employee Compensation	Regular Salaries	\$143,905.41	\$180,187.25	\$36,281.84	25.21%
				1900	Employee Compensation	Regular Employees	\$114,521.78	\$56,699.47	(\$57,822.31)	-50.49%
				5000	Employee Compensation	Employee Salaries	\$3,931,409.73	\$4,078,309.25	\$146,899.52	3.74%
				7000	Employee Compensation	Regular Employee Salaries	\$653,328.24	\$577,193.03	(\$76,135.21)	-11.65%
				All	Employee Compensation	N/A	\$169,185.91	\$0.00	(\$169,185.91)	-100.00%
				All	Regular Employee Compensation	Turnover Savings 5% of payroll	(\$350,000.00)	(\$482,699.66)	(\$132,699.66)	37.91%
		A08	Overtime Pay	5000	Overtime	Overtime for Gaming Agents.	\$100,000.00	\$0.00	(\$100,000.00)	-100.00%
			<b>Obj Class Totals:</b>				<b>\$8,644,526.91</b>	<b>\$8,737,689.97</b>	<b>\$93,163.06</b>	<b>1.08%</b>
		BB	REGULAR EMPLOYEE RELATED EXPEN							
		B01	Other Out Of State Travel - INCLUSIVE: AIRFARE, HOTEL, LODGI	1000	Travel	Out of State Travel	\$3,000.00	\$3,000.00	\$0.00	0.00%
				1100	Travel	Other Out of State Travel-Inclusive Airfare, Hotel, Lodging Gaming Conference	\$500.00	\$500.00	\$0.00	0.00%
				1200	Travel	Out of State Travel and Training	\$6,250.00	\$6,250.00	\$0.00	0.00%
				1300	Travel	Conferences Out of State	\$4,500.00	\$4,500.00	\$0.00	0.00%

Approp	Budget Grouping	Obj Class	Object_name	Unit	Item Short Name	New Description	Current Year Amount	Next Year Amount	Variance	Percent Change
10500001	Mass. Gaming Commission									
	MGC Regulatory Costs									
		B01	Other Out Of State Travel - INCLUSIVE: AIRFARE, HOTEL, LODGI	1400	Travel	Out of State Travel G2E/Gartner increase for more FTE by \$3,125	\$1,875.00	\$5,000.00	\$3,125.00	166.67%
				1500	Travel Reimbursements	Travel Reimbursements --In State (6 Commission Meetings a Year, Site Visits) --Out of Pocket Out of State Expenses	\$18,000.00	\$18,000.00	\$0.00	0.00%
				5000	Travel	Out of state travel reimbursements for gaming enforcement agents and non-state police staff	\$15,000.00	\$15,000.00	\$0.00	0.00%
				7000	Travel	Out-of State Travel Reimbursements	\$1,875.00	\$1,875.00	\$0.00	0.00%
		B02	In-State Travel	1000	Travel	In-State Travel	\$3,000.00	\$3,000.00	\$0.00	0.00%
				1100	Travel	In-state Travel AOC as well as site visits of licensees	\$5,985.00	\$5,985.00	\$0.00	0.00%
				1200	Travel	In State Travel	\$2,400.00	\$2,400.00	\$0.00	0.00%
				1300	Travel	In-State Mileage and Reimbursements	\$4,023.25	\$4,023.25	\$0.00	0.00%
				1400	Travel	In-state travel increase for more FTEs by \$1,250	\$3,750.00	\$5,000.00	\$1,250.00	33.33%
				1800	Travel Reimbursement	In-State Travel Reimbursement	\$4,488.75	\$4,488.75	\$0.00	0.00%
				1900	In State Travel Reimbursement	In-State Travel Reimbursement and Out of State --Visits to Other Licensee Sites	\$2,992.50	\$2,992.50	\$0.00	0.00%
				5000	Travel	In-state-travel reimbursements for gaming enforcement agents and non-state police staff	\$7,980.00	\$7,980.00	\$0.00	0.00%
				7000	Travel	In-State Travel Reimbursements--Fingerprinting Reimbursements	\$997.50	\$0.00	(\$997.50)	-100.00%
		B05	Conference, Training, Registration and Membership Dues and L	1200	Professional Licenses	Professional and Bar Licenses	\$6,000.00	\$6,000.00	\$0.00	0.00%
			<b>Obj Class Totals:</b>				<b>\$92,617.00</b>	<b>\$95,994.50</b>	<b>\$3,377.50</b>	<b>3.65%</b>
		CC	SPECIAL EMPLOYEES							
		C23	Management, Business Professionals & Admin Services	1100	Contract Employee	Administrative Help	\$52,000.00	\$62,640.00	\$10,640.00	20.46%
				5000	Contract Employee	Contracted Civilian Investigators	\$124,800.00	\$130,000.00	\$5,200.00	4.17%
			<b>Obj Class Totals:</b>				<b>\$176,800.00</b>	<b>\$192,640.00</b>	<b>\$15,840.00</b>	<b>8.96%</b>
		DD	PENSION & INSURANCE RELATED EX							
		D09	Fringe Benefit Cost Recoupment	1000	Fringe	Fringe rate of 43.36%	\$214,286.16	\$232,608.03	\$18,321.87	8.55%
				1000	Taxes	Tax rate of 2.45%	\$12,080.10	\$13,143.21	\$1,063.11	8.80%
				1100	Fringe	Fringe rate of 43.36%	\$178,911.75	\$162,348.98	(\$16,562.77)	-9.26%
				1100	Taxes	Tax rate of 2.45%	\$10,085.91	\$10,209.23	\$123.32	1.22%
				1200	Fringe	Fringe rate of 43.36%	\$199,794.49	\$277,769.54	\$77,975.05	39.03%
				1200	Taxes	Tax rate of 2.45%	\$13,146.43	\$15,695.00	\$2,548.57	19.39%

Approp	Budget Grouping	Obj Class	Object_name	Unit	Item Short Name	New Description	Current Year Amount	Next Year Amount	Variance	Percent Change
10500001	Mass. Gaming Commission									
	MGC Regulatory Costs									
		D09	Fringe Benefit Cost Recoupment	1300	Fringe	Fringe rate of 43.36%	\$136,037.28	\$162,801.17	\$26,763.89	19.67%
				1300	Taxes	Tax rate of 2.45%	\$7,668.92	\$9,198.86	\$1,529.94	19.95%
				1400	Fringe	Fringe rate of 43.36%	\$451,635.26	\$559,988.40	\$108,353.14	23.99%
				1400	Taxes	Tax rate of 2.45%	\$25,463.96	\$31,641.41	\$6,177.45	24.26%
				1500	Fringe	Fringe rate of 43.36%	\$258,759.55	\$302,909.99	\$44,150.44	17.06%
				1500	Taxes	Tax rate of 2.45%	\$14,587.23	\$17,115.53	\$2,528.30	17.33%
				1800	Fringe	Fringe rate of 43.36%	\$62,541.29	\$78,129.19	\$15,587.90	24.92%
				1800	Taxes	Tax rate of 2.45%	\$3,525.68	\$4,414.59	\$888.91	25.21%
				1900	Fringe	Fringe rate of 43.36%	\$49,771.17	\$24,584.90	(\$25,186.27)	-50.60%
				1900	Taxes	Tax rate of 2.45%	\$2,805.78	\$1,389.14	(\$1,416.64)	-50.49%
				5000	Fringe	Fringe rate of 43.36%	\$1,708,290.66	\$1,768,354.90	\$60,064.24	3.52%
				5000	Taxes	Tax rate of 2.45%	\$96,319.54	\$99,918.57	\$3,599.03	3.74%
				5000	Taxes	Taxes on CC Employees 2.45%	\$3,057.60	\$2,697.35	(\$360.25)	-11.78%
				7000	Fringe	Fringe rate of 43.36%	\$283,936.45	\$250,270.89	(\$33,665.56)	-11.86%
				7000	Taxes	Tax rate of 2.45%	\$16,006.54	\$14,141.23	(\$1,865.31)	-11.65%
				All	Fringe and Payroll Taxes	Fringe and Payroll Taxes on Turnover Savings (45.81%)	(\$160,335.00)	(\$221,124.72)	(\$60,789.72)	37.91%
				All	Fringe and Taxes	N/A	\$77,504.07	\$0.00	(\$77,504.07)	-100.00%
		D15	Workers' Compensation Chargebacks	1100	Worker's Comp Chargeback	Worker's Comp Chargeback	\$5,000.00	\$10,000.00	\$5,000.00	100.00%
			<b>Obj Class Totals:</b>				<b>\$3,670,880.84</b>	<b>\$3,828,205.39</b>	<b>\$157,324.55</b>	<b>4.29%</b>
	EE		ADMINISTRATIVE EXPENSES							
	E01		Office & Administrative Supplies	1000	Supplies	Adoni Spring Water/Milhench	\$4,000.00	\$4,000.00	\$0.00	0.00%
				1000	Supplies	Cam Office Supplies Increased \$2,500	\$9,500.00	\$12,000.00	\$2,500.00	26.32%
				1000	Supplies	W.B. Mason/Veteran's Business Supply	\$40,000.00	\$40,000.00	\$0.00	0.00%
				1200	Supplies	Office Supplies	\$5,000.00	\$5,000.00	\$0.00	0.00%
				1400	Supplies	Office and Administrative Supplies increase by \$1,500	\$300.00	\$1,800.00	\$1,500.00	500.00%
				5000	Supplies	Supplies	\$5,000.00	\$5,000.00	\$0.00	0.00%
	E02		Printing Expenses & Supplies	1000	Printing	Millenium/RazzMTazz/MG Products	\$2,500.00	\$2,500.00	\$0.00	0.00%
				1100	Printing	Printing of Reports and Best Practices	\$5,000.00	\$5,000.00	\$0.00	0.00%
				1400	Printers	Printers @\$250/printer Decrease by 300	\$300.00	\$0.00	(\$300.00)	-100.00%
				1500	Office Supplies	Lane Printing, etc.	\$200.00	\$200.00	\$0.00	0.00%
				1800	Printing	Printing	\$6,100.00	\$6,100.00	\$0.00	0.00%
				7000	Supplies	Supplies	\$7,500.00	\$7,500.00	\$0.00	0.00%
	E05		Postage Chargeback	1000	Postage	ITD PAD Chargeback for postal Services	\$2,743.92	\$2,743.92	\$0.00	0.00%
	E06		Postage	1000	Postage	Postage for Ashburton Mail Room	\$2,400.00	\$2,400.00	\$0.00	0.00%
				1000	Postage	Postage for Pitney Bowes, Fed Ex, UPS	\$3,000.00	\$3,000.00	\$0.00	0.00%

Approp	Budget Grouping	Obj Class	Object_name	Unit	Item Short Name	New Description	Current Year Amount	Next Year Amount	Variance	Percent Change
10500001	Mass. Gaming Commission									
	MGC Regulatory Costs									
		E06	Postage	7000	Postage	Federal Express Charges	\$1,500.00	\$1,500.00	\$0.00	0.00%
		E12	Subscriptions, Memberships & Licensing Fees	1100	Administrative Expenses	Marketing Sponsorships of Diversity and Opportunity Events GNEMSCD, UMASS, Circa	\$15,000.00	\$15,000.00	\$0.00	0.00%
				1100	Subscriptions	Human Resource Information System	\$5,000.00	\$5,000.00	\$0.00	0.00%
				1100	Subscriptions	Subscriptions, Memberships & Licensing Fees SHRM, NEHRA, The Partnership	\$20,000.00	\$20,000.00	\$0.00	0.00%
				1200	Subscription	Legal Subscription - Law360	\$3,700.00	\$3,700.00	\$0.00	0.00%
				1200	Subscriptions	Subscriptions and Memberships Westlaw ABA Increase \$4k for Thomson Reuters	\$15,000.00	\$19,000.00	\$4,000.00	26.67%
				1200	Subscriptions	nstatrac Subscription	\$4,650.00	\$4,650.00	\$0.00	0.00%
				1300	Memberships	NAGR increased \$300 for costs	\$500.00	\$800.00	\$300.00	60.00%
				1400	Subscriptions	Pagefreezer, Gaming Compliance increase for more FTEs and subscription costs by \$10,214	\$18,676.00	\$28,890.00	\$10,214.00	54.69%
				1500	Subscriptions	Trade Journals	\$5,950.00	\$5,950.00	\$0.00	0.00%
				1800	Subscriptions	Subscriptions, Licensing, Memberships	\$35,650.00	\$35,650.00	\$0.00	0.00%
				5000	Subscriptions	Lexis Nexis, Hire Authority, Nat. Student Loan Increase of \$500/month for GOLD Subscription Service	\$101,000.00	\$101,000.00	\$0.00	0.00%
		E13	Advertising Expenses	1200	Reg Advertising	Advertising of Regs and Meetings Increase \$5k for Racing	\$10,000.00	\$15,000.00	\$5,000.00	50.00%
		E15	Bottled Water	1000	Water	Quench	\$1,500.00	\$1,500.00	\$0.00	0.00%
		E18	State Single Audit Chargeback	1000	Chargeback	Chargeback Single State Audit	\$500.00	\$500.00	\$0.00	0.00%
		E19	Fees, Fines, Licenses, Permits & Chargebacks	1000	Fees, Fines, Licensed, Chargebakcs	EZ Pass/Occupancy/Commissions	\$1,700.00	\$1,700.00	\$0.00	0.00%
				1100	Licenses	Fees, Fines, Licenses, Permits & Chargebacks for HRCMS and HRD	\$9,000.00	\$9,000.00	\$0.00	0.00%
		E20	Motor Vehicle Chargeback	5000	Motor Vehcile Lease	OVM Chargeback	\$6,110.00	\$6,110.00	\$0.00	0.00%
		E22	Temp Use Space/Confer-Incidental Includes Reservation Fees	1000	Laz Parking/VPNE	Parking at 33 Arch St.	\$54,000.00	\$54,000.00	\$0.00	0.00%
				1100	Conference Incidentals	Conference Incidentals	\$5,000.00	\$5,000.00	\$0.00	0.00%
				1100	Conferences	Workforce/Diversity Meetings--Digital also	\$7,000.00	\$7,000.00	\$0.00	0.00%
				1500	Meeting Space	Temporary Space @ 6mtgs - \$2K meeting space 6 mtgs and \$5k to stream for 4 of the meetings	\$32,000.00	\$32,000.00	\$0.00	0.00%
				1500	Team Building	Team Building, Agency Conferences	\$8,000.00	\$8,000.00	\$0.00	0.00%
		E30	Credit Card Purchases	1000	Credit Card	Credit Card Incidental Purchases	\$2,000.00	\$2,000.00	\$0.00	0.00%
				1100	Credit Card Charges	FIA Card	\$3,000.00	\$3,000.00	\$0.00	0.00%

Approp	Budget Grouping	Obj Class	Object_name	Unit	Item Short Name	New Description	Current Year Amount	Next Year Amount	Variance	Percent Change
10500001	Mass. Gaming Commission									
	MGC Regulatory Costs									
		E30	Credit Card Purchases	1200	Credit Card	Credit Card Purchases	\$5,000.00	\$5,000.00	\$0.00	0.00%
				1300	Credit Card	Credit Card Purchases	\$5,000.00	\$5,000.00	\$0.00	0.00%
				1400	Credit Card	Credit Card Purchases; \$400 Domain GOV Renewal	\$1,000.00	\$1,000.00	\$0.00	0.00%
				1500	Credit Card	Allowable Credit Card Expenses	\$7,500.00	\$7,500.00	\$0.00	0.00%
				5000	Credit Card	Credit Card Purchases	\$15,000.00	\$15,000.00	\$0.00	0.00%
		E41	Out Of State Travel Expen on Behalf of State Employ	1000	Travel	Travel Agency Fees	\$2,500.00	\$2,500.00	\$0.00	0.00%
				1100	Travel	Travel Agent	\$1,000.00	\$1,000.00	\$0.00	0.00%
				1200	Conference, Training, Registion Fees	Conference, Training, Registion Fees \$1,750 Increase for more conferences	\$6,250.00	\$8,000.00	\$1,750.00	28.00%
				1200	Travel	Conference/Trainings Travel and Lodging for FTEs Increase \$2,500 for more travel	\$2,500.00	\$5,000.00	\$2,500.00	100.00%
				1400	Out of State Travel	Travel Agent - Travel Leaders Additional FTEs budgeting for Travel	\$0.00	\$20,000.00	\$20,000.00	#Div/0!
				1500	Travel Agency Fees	Travel	\$10,000.00	\$10,000.00	\$0.00	0.00%
				5000	Travel Agent	Travel Agent for Trainings and Investigations Decrease of \$20K for costs shared with Sports Wagering	\$100,000.00	\$80,000.00	(\$20,000.00)	-20.00%
				7000	Travel Agent	Travel Leaders G2E for meetings with Vendors and Licensing of Primaries	\$7,000.00	\$7,000.00	\$0.00	0.00%
		EE2	Conference, Training and Registration Fees	1000	Conference Registrations	Registration Fees	\$1,125.00	\$1,125.00	\$0.00	0.00%
				1100	Conference, Training Registration Fees	GNEMSDC, Umass, Diversity Conferences	\$5,500.00	\$5,500.00	\$0.00	0.00%
				1100	Training	Conference, Training and Registration Fees	\$500.00	\$500.00	\$0.00	0.00%
				1300	Travel and Conf	Conference, Training and Registration Fees	\$5,000.00	\$5,000.00	\$0.00	0.00%
				1400	Conference	Conference, Training and Registrations Fees Increase for more FTEs by \$2,473	\$2,500.00	\$4,973.00	\$2,473.00	98.92%
				1500	Registration Fees	Conference/Trainings	\$7,000.00	\$7,000.00	\$0.00	0.00%
				5000	Registrations	Training/Conference Registration Fees. Decreased \$5k for costs shared with Sports Wagering	\$30,000.00	\$25,000.00	(\$5,000.00)	-16.67%
				7000	Conferences	Conference, Training & Registration.	\$4,000.00	\$4,000.00	\$0.00	0.00%
		EE9	Employee Recognition Chargeback	1100	Employee Morale	Employee Recognition Program	\$5,000.00	\$5,000.00	\$0.00	0.00%
			<b>Obj Class Totals:</b>				<b>\$683,354.92</b>	<b>\$708,291.92</b>	<b>\$24,937.00</b>	<b>3.65%</b>
		FF	FACILITY OPERATIONAL EXPENSES							
		F09	Clothing & Footwear	5000	Programatic Supplies	Clothing and Footwear	\$20,000.00	\$20,000.00	\$0.00	0.00%

Approp	Budget Grouping	Obj Class	Object_name	Unit	Item Short Name	New Description	Current Year Amount	Next Year Amount	Variance	Percent Change
10500001	Mass. Gaming Commission									
	MGC Regulatory Costs									
			<b>Obj Class Totals:</b>				<b>\$20,000.00</b>	<b>\$20,000.00</b>	<b>\$0.00</b>	<b>0.00%</b>
		GG	ENERGY COSTS AND SPACE RENTAL							
		G01	Space Rental	1000	Office Lease	101 Federal St. First 6 months \$677,728.64 old lease costs, second 6 months at discount for first year of renewal \$654,850.20, 3 months of old lease for free for renewing 5 years (\$333,864.32). Total FY 25 Lease costs \$988,714.52. 70% to Gaming--\$692,1	\$949,257.12	\$692,100.16	(\$257,156.96)	-27.09%
				1400	Data Center	Increase \$85,158.72 for IGT move Data Center Costs (Rack Space, maintenance for 2 Data Centers)	\$85,158.72	\$85,158.72	\$0.00	0.00%
				1500	75-101 Parking Garage	Parking 75-101--5 spaces. Two of the spaces are included in the lease. This item pays for 3 of the spaces.	\$13,642.20	\$13,642.20	\$0.00	0.00%
		G03	Electricity	1000	Electricity	101 Federal St. 12 months	\$23,334.34	\$23,334.34	\$0.00	0.00%
		G05	Fuel For Vehicles	1000	Gas	Wex Bank/Gulf	\$3,000.00	\$3,000.00	\$0.00	0.00%
			<b>Obj Class Totals:</b>				<b>\$1,074,392.38</b>	<b>\$817,235.42</b>	<b>(\$257,156.96)</b>	<b>-23.94%</b>
		HH	CONSULTANT SVCS (TO DEPTS)							
		H09	Attorneys/Legal Services	1000	Insurance	Comprehensive Insurance Policy	\$163,500.00	\$163,500.00	\$0.00	0.00%
				1100	Legal Consultants	Employment Laywers	\$5,000.00	\$5,000.00	\$0.00	0.00%
				1100	Worker's Comp	Workers Comp Litigation Fees	\$5,000.00	\$5,000.00	\$0.00	0.00%
				1200	Litigation Defense	Outside Counsel Litigation Defense	\$400,000.00	\$400,000.00	\$0.00	0.00%
				1200	Outside Counsel	General Practice, Regulations, Laws, etc.	\$75,000.00	\$75,000.00	\$0.00	0.00%
				1200	Outside Counsel	Increase for Consultation for New Union Initiative Labor Employment Law	\$50,000.00	\$50,000.00	\$0.00	0.00%
				1500	Consultant	N/A	\$61,383.31	\$0.00	(\$61,383.31)	-100.00%
		H19	Management Consultants	1000	Outside Consultant	CPA Firm for Annual Audits consistent with Generally Accepted Auditing Standards	\$70,000.00	\$70,000.00	\$0.00	0.00%
				1200	Hearing Officer	Hearing Officer Increased \$25,000 volume of cases	\$40,000.00	\$65,000.00	\$25,000.00	62.50%
				1300	Strategic Consultant	General Consultant needs for Commissioners or Executive Director	\$10,000.00	\$10,000.00	\$0.00	0.00%
		H23	Program Coordinators	1100	Consultants	Diversity Equity and Inclusion RFR or SWC Increased Shifted \$60,000 from LEAF Grant	\$50,000.00	\$110,000.00	\$60,000.00	120.00%
				1100	Strategic Consultant	Strategic Organizational Consult and Compensation	\$0.00	\$0.00	\$0.00	#Num!
				1500	Consultant	General Consulting	\$10,000.00	\$10,000.00	\$0.00	0.00%
		HH3	Media Design, Editorial and Communication	1800	Website Design	Marketing & Website Design	\$25,000.00	\$25,000.00	\$0.00	0.00%
			<b>Obj Class Totals:</b>				<b>\$964,883.31</b>	<b>\$988,500.00</b>	<b>\$23,616.69</b>	<b>2.45%</b>
		JJ	OPERATIONAL SERVICES							

Approp	Budget Grouping	Obj Class	Object_name	Unit	Item Short Name	New Description	Current Year Amount	Next Year Amount	Variance	Percent Change
10500001	Mass. Gaming Commission									
	MGC Regulatory Costs									
		J10	Auxiliary Financial Services	1000	Auxiliary Financial Services	Credit Card Fees/BillMatrix	\$200.00	\$200.00	\$0.00	0.00%
		J25	Laboratory & Pharmaceutical Services	5000	Everett Police	EPDEverett Police GEU 7FTE's Increase of 5% year over year, 4% for salaries	\$1,666,543.75	\$1,748,361.00	\$81,817.25	4.91%
				5000	Finger Prints State Police	Chargeback for Finger Print Costs for Licenses \$50/set and ~4.5K prints	\$50,000.00	\$50,000.00	\$0.00	0.00%
				5000	Plainville Police Salaries	Plainville Local Police Increase 3% for salaries as well as \$17.29k for operational equipment portable radios and body cameras	\$412,743.22	\$441,055.27	\$28,312.05	6.86%
				5000	Springfield Police Salaries	SPDSpringfield Police GEU 7 FTEs Increase of 3% on updated FY24 Budget	\$1,089,648.14	\$1,207,684.31	\$118,036.17	10.83%
				5000	State Police	MSP MGC Salaries for MGC Investigations and Background Unit 4% increase plus taxes plus 3 additional FTEs	\$983,275.34	\$1,012,733.60	\$29,458.26	3.00%
				5000	State Police	MSPMGC Staff Costs at MGM 16 FTEs 4% Increase plus taxes	\$1,890,486.33	\$2,062,795.61	\$172,309.28	9.11%
				5000	State Police	MSPMGC State Police Troopers Plainville Straight Time and Payroll Taxes 4% increase plus taxes	\$1,316,353.58	\$1,531,220.58	\$214,867.00	16.32%
				5000	State Police	MSPMGC State Troopers Everett 4% increase plus taxes	\$1,793,626.06	\$1,923,570.47	\$129,944.41	7.24%
				5000	State Police	Racing TroopersShifted Costs to Gaming 4% increase plus taxes	\$388,377.37	\$443,340.30	\$54,962.93	14.15%
				5000	State Police OT & Travel	OT and Travel for Troopers assigned to MGC GEU Increase 4% plus taxes	\$2,056,111.75	\$2,183,475.54	\$127,363.79	6.19%
		J28	Law Enforcement	5000	Lease Vehicles	Plainville Law Enforcement Vehicles	\$8,877.39	\$8,877.39	\$0.00	0.00%
		J46	Temporary Help Services	1100	Temp Help	Temp help/interns/diversity	\$75,000.00	\$75,000.00	\$0.00	0.00%
				1400	TEMPORARY HELP SERVICES	SevenStep or other Temp Help	\$0.00	\$30,000.00	\$30,000.00	#Div/0!
		J50	Instructors/Lecturers/Trainers	1300	Training	Upper Management Training	\$5,000.00	\$5,000.00	\$0.00	0.00%
				1400	Training	Technical Training not available on LinkedIn	\$5,000.00	\$5,000.00	\$0.00	0.00%
		JJ1	Legal Support Services	1200	Operational Services	Offsite Storage - \$50 per month charge if boxes are pulledIncreased GRM Usage Increased for more digitization of files	\$750.00	\$4,000.00	\$3,250.00	433.33%
		JJ2	Auxiliary Services	1000	Courier	USA Couriers	\$300.00	\$300.00	\$0.00	0.00%
				1000	Shredding	ProShred	\$1,615.00	\$1,615.00	\$0.00	0.00%
				1100	HR Investigations	HR Investigations	\$10,000.00	\$10,000.00	\$0.00	0.00%
				1100	Testing	Workcare Health Resouces	\$3,000.00	\$3,000.00	\$0.00	0.00%
				1800	Streaming	Streaming & Production of Public Meetings	\$23,000.00	\$23,000.00	\$0.00	0.00%
			<b>Obj Class Totals:</b>				<b>\$11,779,907.93</b>	<b>\$12,770,229.07</b>	<b>\$990,321.14</b>	<b>8.41%</b>
		KK	EQUIPMENT PURCHASE							



Approp	Budget Grouping	Obj Class	Object_name	Unit	Item Short Name	New Description	Current Year Amount	Next Year Amount	Variance	Percent Change
10500001	Mass. Gaming Commission									
	MGC Regulatory Costs									
		K05	Office Equipment	1800	Equipment Purchases	Increased to purchase additional Photography/Streaming Equipment Net Zero Purchase	\$5,000.00	\$5,000.00	\$0.00	0.00%
		K07	Office Furnishings	1400	Office Equipment	Creative Office Pavillion	\$5,000.00	\$5,000.00	\$0.00	0.00%
				1500	Office Equipment	Office Furnishings	\$5,000.00	\$5,000.00	\$0.00	0.00%
				5000	Office Equipment	Patrol Riffls/Active Shooter Gear-- Replacement/Upgrade of Fingerprint Machines to be Windows Compliant	\$47,000.00	\$47,000.00	\$0.00	0.00%
		<b>Obj Class Totals:</b>					<b>\$62,000.00</b>	<b>\$62,000.00</b>	<b>\$0.00</b>	<b>0.00%</b>
	LL	<i>EQUIPMENT LEASE-MAINTAIN/REPAR</i>								
		L24	Motorized Vehicle Equipment Rental or Lease	1000	Rental Cars	Enterprise Car Rental	\$500.00	\$500.00	\$0.00	0.00%
				1400	MOTORIZED VEHICLE EQUIPMENT RENTAL OR LEASE	Enterprise Rental rental for conferences travel	\$0.00	\$500.00	\$500.00	#Div/0!
		L25	Office Equipment Rental or Lease	1000	Printing	Pitney Bowes	\$607.90	\$607.90	\$0.00	0.00%
		L26	Printing/Photocopy & Micrographics Equip Rent/Lease	1000	Copier	Canon Financial Services Increase @\$1,900 Recurring Payments for 13th floor and IEB Per Click costs of \$2.5K	\$10,100.00	\$12,000.00	\$1,900.00	18.81%
				7000	Equipment Leases	Increased for Idemia Scanner Maintenance	\$10,000.00	\$25,000.00	\$15,000.00	150.00%
		L46	Print, Photocopying & Micrograph Equipment Maint/Repair	1000	Copier	Canon USA/Maintenance & Repair--Initial Contract Rate Ended	\$5,000.00	\$5,000.00	\$0.00	0.00%
				1000	Xerox Leases	6 Machines average \$300 per month Xerox Leases Recurring Payments of \$11.1K for 3 machines Per Click costs of \$3.2K (avg of this year) Increase \$400	\$21,600.00	\$22,000.00	\$400.00	1.85%
		<b>Obj Class Totals:</b>					<b>\$47,807.90</b>	<b>\$65,607.90</b>	<b>\$17,800.00</b>	<b>37.23%</b>
	NN	<i>INFRASTRUCTURE:</i>								
		N50	Non-Major Facility Infrastructure Maintenance and Repair	1000	Repairs	Office/Building Repairs	\$5,000.00	\$5,000.00	\$0.00	0.00%
				1400	Facilities Maintenance	\$4,450 Annual Main & Support, Parts/HVAC monitoring; Viscom \$1,500 Building Security	\$10,000.00	\$10,000.00	\$0.00	0.00%
				5000	Non-Major Facility Maintenance & Repair	Office Reconfiguration	\$15,000.00	\$15,000.00	\$0.00	0.00%
		<b>Obj Class Totals:</b>					<b>\$30,000.00</b>	<b>\$30,000.00</b>	<b>\$0.00</b>	<b>0.00%</b>
	PP	<i>STATE AID/POL SUB</i>								
		P01	Grants To Public Entities	1100	Grants	Worforce Development and Diversity Grants Reduced \$60,000 moved to H23	\$150,000.00	\$90,000.00	(\$60,000.00)	-40.00%
		<b>Obj Class Totals:</b>					<b>\$150,000.00</b>	<b>\$90,000.00</b>	<b>(\$60,000.00)</b>	<b>-40.00%</b>
	UU	<i>IT Non-Payroll Expenses</i>								

Approp	Budget Grouping	Obj Class	Object_name	Unit	Item Short Name	New Description	Current Year Amount	Next Year Amount	Variance	Percent Change
10500001	Mass. Gaming Commission									
	MGC Regulatory Costs									
		U01	Telecommunications Services Data	1400	TELECOMMUNICAT IONS SERVICES DATA	Surveillance, CMS Primary/Backup Circuits, Lab Line, Windstream Services (VPN, LAN, WAN redundancy) etc decrease of \$144,390,22 from IGT Move	\$372,140.22	\$227,750.00	(\$144,390.22)	-38.80%
		U02	Telecommunications Services - Voice	1400	TELECOMMUNICAT IONS SERVICES - VOICE	OfficeSuite (Voice, HD Meeting, WeConnect), Verizon Wireless, Multi-location fax lines Increase of \$52,422,26	\$80,587.74	\$133,010.00	\$52,422.26	65.05%
		U03	Software & Information Technology Licenses (IT)	1000	Software	Software - LinkSquares CLM	\$35,750.00	\$35,750.00	\$0.00	0.00%
				1100	Software	Cornerstone HR Employee Performance Review Software Increased to \$16,275	\$10,725.00	\$27,000.00	\$16,275.00	151.75%
				1400	SOFTWARE & INFORMATION TECHNOLOGY LICENSES (IT)	Azure Sentinel, M365 G5 Compliance, M365 G5 Security Adobe, Sharepoint, O365, Azure, JIRA, MDM etc Decrease of \$56,129.86	\$387,517.16	\$331,387.30	(\$56,129.86)	-14.48%
				5000	Software	ITRACK- Omnigoincrease \$1k for costs	\$13,000.00	\$14,000.00	\$1,000.00	7.69%
				7000	Software	Licensing System Software	\$0.00	\$350,000.00	\$350,000.00	#Div/0!
		U04	Information Technology Chargeback	1400	INFORMATION TECHNOLOGY CHARGEBACK	EOTSS Offsite Rack Storage and Maintenance	\$0.00	\$65,000.00	\$65,000.00	#Div/0!
		U05	Information Technology (IT) Temp Staff Augmentation Profs	1000	IT Consultants	Diversity Consultants	\$25,000.00	\$25,000.00	\$0.00	0.00%
				1000	IT Consultants	Web penetration Testing	\$8,000.00	\$8,000.00	\$0.00	0.00%
				1400	IT Staff Augment	Contract Systems Admin eDiscovery Specialist	\$0.00	\$80,000.00	\$80,000.00	#Div/0!
				1400	IT Staff Augment	Talent Burst It Staff Augment	\$0.00	\$39,750.00	\$39,750.00	#Div/0!
				1400	CMS - \$2,484,206.46	CMS - IGT Intelligen (PPC, MGM, EBH) IGT move adjusted costs down 39,127.83	\$2,326,368.27	\$2,287,240.44	(\$39,127.83)	-1.68%
				1400	CONSULTING - \$75,000	IT Consulting Support (TBD)	\$50,000.00	\$50,000.00	\$0.00	0.00%
				1400	IGT NOC Migration	Increase for data center move and for parts IGT NOC Migration Removed	\$403,961.00	\$0.00	(\$403,961.00)	-100.00%
				1400	Staff Augmentations Professionals	McInnis Consulting Jira Expert Removed	\$10,000.00	\$0.00	(\$10,000.00)	-100.00%
		U06	Information Technology (IT) Cabling	1400	IT Cabling	Runs/Cabling	\$3,000.00	\$3,000.00	\$0.00	0.00%
		U07	Information Technology (IT) Equipment	1400	IT Equipment	IT Equipment, emergency replacements (switches, routers, firewalls) etc Increase of \$91,325	\$103,675.00	\$195,000.00	\$91,325.00	88.09%
		U09	Information Technology (IT) Equip Rental Or Lease	1400	INFORMATION TECHNOLOGY (IT) EQUIP RENTAL OR LEASE	ACS Leases (Refresh) increase of lease costs for more FTEs of \$23,019.08	\$89,871.92	\$112,891.00	\$23,019.08	25.61%
		U10	Information Tech (IT) Equipment Maintenance & Repair	1000	Cable	Cable/Comcast	\$5,500.00	\$5,500.00	\$0.00	0.00%

Approp	Budget Grouping	Obj Class	Object_name	Unit	Item Short Name	New Description	Current Year Amount	Next Year Amount	Variance	Percent Change	
10500001	Mass. Gaming Commission										
	MGC Regulatory Costs										
		U10	Information Tech (IT) Equipment Maintenance & Repair	1400	IT Maintenance and Repair	Annual M&S Equipment/Services Reduction of \$16,605.88	\$94,238.97	\$77,633.09	(\$16,605.88)	-17.62%	
		U11	Information Technology (IT) Contract Services	1400	IT Contract Services	LMS, Gartner, Tallan Servicese increase of \$201,439.85 includes Xfact for Licensing Maintenance	\$193,777.15	\$395,217.00	\$201,439.85	103.95%	
				7000	IT Consultant	Licensing System Implementation	\$0.00	\$262,500.00	\$262,500.00	#Div/0!	
		<b>Obj Class Totals:</b>						<b>\$4,213,112.43</b>	<b>\$4,725,628.83</b>	<b>\$512,516.40</b>	<b>12.16%</b>
	MGC Regulatory Costs	<b>Totals:</b>						<b>\$31,610,283.62</b>	<b>\$33,132,023.00</b>	<b>\$1,521,739.38</b>	<b>4.81%</b>

Approp	Budget Grouping	Obj Class	Object_name	Unit	Item Short Name	New Description	Current Year Amount	Next Year Amount	Variance	Percent Change
10500001	Mass. Gaming Commission									
	Indirect									
		EE	ADMINISTRATIVE EXPENSES							
		E16	Indirect Cost Recoupment	2000	Indirect Agency Wide	Indirect at 10% of AA, CC, HH, JJ and UU excluding U07	\$55,756.33	\$0.00	(\$55,756.33)	-100.00%
				2000	Indirect Agency Wide	Indirect at 10% of AA, CC, HH, JJ and UU excluding U07	\$2,549,564.19	\$2,668,901.53	\$119,337.34	4.68%
			<b>Obj Class Totals:</b>				<b>\$2,605,320.52</b>	<b>\$2,668,901.53</b>	<b>\$63,581.01</b>	<b>2.44%</b>
	Indirect		<b>Totals:</b>				<b>\$2,605,320.52</b>	<b>\$2,668,901.53</b>	<b>\$63,581.01</b>	<b>2.44%</b>

Approp	Budget Grouping	Obj Class	Object_name	Unit	Item Short Name	New Description	Current Year Amount	Next Year Amount	Variance	Percent Change
10500001	Mass. Gaming Commission									
	Office of Attorney General and AGO MSP									
		JJ	OPERATIONAL SERVICES							
		J25	Laboratory & Pharmaceutical Services	9000	State Police	MSPAGO Straight Time Troopers 4% increase including Payroll Taxes	\$636,238.55	\$687,879.43	\$51,640.88	8.12%
				9000	State Police	MSPAGO State Police OT4% increase plus taxes	\$360,500.00	\$382,830.81	\$22,330.81	6.19%
			<b>Obj Class Totals:</b>				<b>\$996,738.55</b>	<b>\$1,070,710.24</b>	<b>\$73,971.69</b>	<b>7.42%</b>
		OO								
		O99		9000	Attorney General	place holder Funds FTEs assigned to the unit, various percentages of FTEs of support, and management positions, office space, travel, conferences, and investigative costs.	\$2,927,384.00	\$2,927,384.00	\$0.00	0.00%
			<b>Obj Class Totals:</b>				<b>\$2,927,384.00</b>	<b>\$2,927,384.00</b>	<b>\$0.00</b>	<b>0.00%</b>
	Office of Attorney General and AGO MSP		<b>Totals:</b>				<b>\$3,924,122.55</b>	<b>\$3,998,094.24</b>	<b>\$73,971.69</b>	<b>1.89%</b>

Approp	Budget Grouping	Obj Class	Object_name	Unit	Item Short Name	New Description	Current Year Amount	Next Year Amount	Variance	Percent Change	
10500001	Mass. Gaming Commission										
	Alcohol and Beverage Control Commission										
		00									
		001		9001	ISA with ABCC	ABCC	\$75,000.00	\$75,000.00	\$0.00	0.00%	
		<b>Obj Class Totals:</b>						<b>\$75,000.00</b>	<b>\$75,000.00</b>	<b>\$0.00</b>	<b>0.00%</b>
	Alcohol and Beverage Control Commission	<b>Totals:</b>						<b>\$75,000.00</b>	<b>\$75,000.00</b>	<b>\$0.00</b>	<b>0.00%</b>

Approp	Budget Grouping	Obj Class	Object_name	Unit	Item Short Name	New Description	Current Year Amount	Next Year Amount	Variance	Percent Change
10500001	Mass. Gaming Commission									
<b>Appropriation Totals</b>							<b>\$38,214,726.69</b>	<b>\$39,874,018.77</b>	<b>\$1,659,292.08</b>	<b>4.34%</b>
10500003	MGC Mass Racing Development and Oversight									
	MGC Regulatory Costs									
	AA		REGULAR EMPLOYEE COMPENSATION							
	A01		Salaries: Inclusive	1000	Employee Compensation	Admin Employees Salaries	\$102,489.31	\$90,663.52	(\$11,825.79)	-11.54%
				1100	Employee Compensation	HR Employees Salaries	\$27,166.97	\$13,561.75	(\$13,605.22)	-50.08%
				1100	Raises	3% COLA/Incentives/Equity Agency Wide	\$37,277.01	\$18,910.14	(\$18,366.87)	-49.27%
				1200	Employee Compensation	Legal Employees Salaries	\$58,533.91	\$28,684.14	(\$29,849.77)	-51.00%
				1300	Employee Compensation	Exec. Dir. Employees Salaries	\$38,412.71	\$16,174.31	(\$22,238.40)	-57.89%
				1400	Employee Compensation	IT Employees Salaries	\$99,434.49	\$50,863.65	(\$48,570.84)	-48.85%
				1500	Employee Compensation	Commissioners Employees Salaries	\$59,539.70	\$31,280.31	(\$28,259.39)	-47.46%
				1800	Employee Compensation	Communications Employees Salaries	\$14,390.54	\$7,183.75	(\$7,206.79)	-50.08%
				3000	Employee Compensation	Regular Employee Salaries	\$322,652.95	\$361,690.94	\$39,037.99	12.10%
				5000	Employee Compensation	Admin Employees Salaries	\$51,946.51	\$20,233.39	(\$31,713.12)	-61.05%
				7000	Employee Compensation	Regular Employee Salaries	\$4,719.52	\$5,104.63	\$385.11	8.16%
				All	Employee Compensation	N/A	(\$255,202.49)	\$0.00	\$255,202.49	-100.00%
				All	Regular Employee Compensation	Turnover Savings 5% of payroll	\$0.00	(\$32,462.40)	(\$32,462.40)	#Div/0!
			<b>Obj Class Totals:</b>				<b>\$561,361.13</b>	<b>\$611,888.13</b>	<b>\$50,527.00</b>	<b>9.00%</b>
	BB		REGULAR EMPLOYEE RELATED EXPEN							
	B01		Other Out Of State Travel - INCLUSIVE: AIRFARE, HOTEL, LODGI	3000	Travel	Out of State Travel Reimbursement Reduced \$6k	\$10,000.00	\$4,000.00	(\$6,000.00)	-60.00%
	B02		In-State Travel	3000	Travel	In State Travel Reimbursement Reduced 1K	\$3,000.00	\$2,000.00	(\$1,000.00)	-33.33%
			<b>Obj Class Totals:</b>				<b>\$13,000.00</b>	<b>\$6,000.00</b>	<b>(\$7,000.00)</b>	<b>-53.85%</b>
	CC		SPECIAL EMPLOYEES							
	C04		Contracted Seasonal Employees	3000	Seasonals	Seasonal Employees	\$482,040.00	\$482,040.00	\$0.00	0.00%
	C23		Management, Business Professionals & Admin Services	1100	Contract Employee	Administrative Help	\$5,200.00	\$5,200.00	\$0.00	0.00%
			<b>Obj Class Totals:</b>				<b>\$487,240.00</b>	<b>\$487,240.00</b>	<b>\$0.00</b>	<b>0.00%</b>
	DD		PENSION & INSURANCE RELATED EX							
	D09		Fringe Benefit Cost Recoupment	1000	Fringe	Fringe rate of 43.36%	\$44,541.85	\$39,311.70	(\$5,230.15)	-11.74%

Approp	Budget Grouping	Obj Class	Object_name	Unit	Item Short Name	New Description	Current Year Amount	Next Year Amount	Variance	Percent Change
10500003	MGC Mass Racing Development and Oversight									
	MGC Regulatory Costs									
	D09		Fringe Benefit Cost Recoupment	1000	Taxes	Tax rate of 2.45%	\$2,510.99	\$2,221.26	(\$289.73)	-11.54%
				1100	Fringe	Fringe rate of 43.36%	\$11,806.77	\$5,880.37	(\$5,926.40)	-50.19%
				1100	Taxes	Tax rate of 2.45%	\$665.59	\$332.26	(\$333.33)	-50.08%
				1200	Fringe	Fringe rate of 43.36%	\$23,304.82	\$12,437.44	(\$10,867.38)	-46.63%
				1200	Taxes	Tax rate of 2.45%	\$1,314.64	\$702.76	(\$611.88)	-46.54%
				1300	Fringe	Fringe rate of 43.36%	\$13,603.73	\$7,013.19	(\$6,590.54)	-48.45%
				1300	Taxes	Tax rate of 2.45%	\$766.89	\$396.27	(\$370.62)	-48.33%
				1400	Fringe	Fringe rate of 43.36%	\$43,207.81	\$22,054.48	(\$21,153.33)	-48.96%
				1400	Taxes	Tax rate of 2.45%	\$2,436.15	\$1,246.15	(\$1,190.00)	-48.85%
				1500	Fringe	Fringe rate of 43.36%	\$25,875.95	\$13,563.14	(\$12,312.81)	-47.58%
				1500	Taxes	Tax rate of 2.45%	\$1,458.72	\$766.37	(\$692.35)	-47.46%
				1800	Fringe	Fringe rate of 43.36%	\$6,254.13	\$3,114.87	(\$3,139.26)	-50.19%
				1800	Taxes	Tax rate of 2.45%	\$352.57	\$176.00	(\$176.57)	-50.08%
				3000	Fringe	Fringe rate of 43.36%	\$140,224.97	\$156,829.20	\$16,604.23	11.84%
				3000	Taxes	Tax rate of 2.45%	\$7,905.00	\$8,861.42	\$956.42	12.10%
				5000	Fringe	Fringe rate of 43.36%	\$22,575.95	\$20,233.39	(\$2,342.56)	-10.38%
				5000	Taxes	Tax rate of 2.45%	\$1,272.69	\$8,773.20	\$7,500.51	589.34%
				7000	Fringe	Fringe rate of 43.36%	\$2,051.10	\$2,213.37	\$162.27	7.91%
				7000	Taxes	Tax rate of 2.45%	\$115.63	\$125.06	\$9.43	8.16%
				All	Fringe and Taxes	N/A	(\$116,908.26)	\$0.00	\$116,908.26	-100.00%
			<b>Obj Class Totals:</b>				<b>\$235,337.69</b>	<b>\$306,251.90</b>	<b>\$70,914.21</b>	<b>30.13%</b>
	EE	ADMINISTRATIVE EXPENSES								
	E01		Office & Administrative Supplies	3000	Supplies	W.B. Mason moved to Finance	\$7,500.00	\$0.00	(\$7,500.00)	-100.00%
	E02		Printing Expenses & Supplies	3000	Printing	Millineum Printing moved to Finance	\$500.00	\$0.00	(\$500.00)	-100.00%
	E12		Subscriptions, Memberships & Licensing Fees	3000	Memberships	AA Dority/Organization of Racing Investigators not renewing would fall under IEB	\$5,625.00	\$0.00	(\$5,625.00)	-100.00%
				3000	Memberships	Assoc. of Racing Regulators	\$18,700.00	\$18,700.00	\$0.00	0.00%
	E13		Advertising Expenses	3000	Public Hearing Notices	Boston Globe moved to Legal	\$1,000.00	\$0.00	(\$1,000.00)	-100.00%
				3000	Public Hearing Notices	Boston Herald moved to Legal	\$700.00	\$0.00	(\$700.00)	-100.00%
	E15		Bottled Water	3000	Water	Belmont Springs/DS Waters of America	\$360.00	\$360.00	\$0.00	0.00%
	E41		Out Of State Travel Expen on Behalf of State Employ	3000	Travel Agent	Travel	\$5,000.00	\$5,000.00	\$0.00	0.00%
	EE2		Conference, Training and Registration Fees	3000	Conferences	Assoc. of Racing Comm./Louisiana Racing/Thoroughbred Racing	\$3,000.00	\$3,000.00	\$0.00	0.00%
			<b>Obj Class Totals:</b>				<b>\$42,385.00</b>	<b>\$27,060.00</b>	<b>(\$15,325.00)</b>	<b>-36.16%</b>
	FF	FACILITY OPERATIONAL EXPENSES								



Approp	Budget Grouping	Obj Class	Object_name	Unit	Item Short Name	New Description	Current Year Amount	Next Year Amount	Variance	Percent Change
10500003	MGC Mass Racing Development and Oversight									
	MGC Regulatory Costs									
		F05	Laboratory Supplies	3000	Vet Supplies	Gloves, scrubs etc.	\$2,000.00	\$2,000.00	\$0.00	0.00%
		F09	Clothing & Footwear	3000	Equipment	Misc Facility Equipment Removed from Budget	\$25,000.00	\$0.00	(\$25,000.00)	-100.00%
				3000	Uniforms	Racing Uniforms for Seasonal Employees Reduced \$15K	\$15,000.00	\$10,000.00	(\$5,000.00)	-33.33%
		<b>Obj Class Totals:</b>					<b>\$42,000.00</b>	<b>\$12,000.00</b>	<b>(\$30,000.00)</b>	<b>-71.43%</b>
	HH	CONSULTANT SVCS (TO DEPTS)								
	H19		Management Consultants	3000	Hearing Officer	Hearing Officer for Racing Appeals	\$25,000.00	\$10,000.00	(\$15,000.00)	-60.00%
		<b>Obj Class Totals:</b>					<b>\$25,000.00</b>	<b>\$10,000.00</b>	<b>(\$15,000.00)</b>	<b>-60.00%</b>
	JJ	OPERATIONAL SERVICES								
	J10		Auxiliary Financial Services	3000	Credit Cards	Bank of America credit card terminal fees	\$1,000.00	\$1,000.00	\$0.00	0.00%
	J25		Laboratory & Pharmaceutical Services	3000	Testing	Workcare Reduced \$500	\$2,000.00	\$1,500.00	(\$500.00)	-25.00%
	J28		Law Enforcement	3000	State Police	MSP Racing Straight Time Moved to IEB	\$388,377.37	\$0.00	(\$388,377.37)	-100.00%
				3000	State Police	N/A	(\$388,377.37)	\$0.00	\$388,377.37	-100.00%
	JJ1		Legal Support Services	3000	Stenographer	Hardeman RealTime Moved to Legal	\$5,000.00	\$0.00	(\$5,000.00)	-100.00%
	JJ2		Auxiliary Services	3000	Autopsies	Uconn Pathology	\$6,000.00	\$6,000.00	\$0.00	0.00%
				3000	Testing Lab	Industrial Laboratories or alternate lab	\$382,500.00	\$382,500.00	\$0.00	0.00%
		<b>Obj Class Totals:</b>					<b>\$396,500.00</b>	<b>\$391,000.00</b>	<b>(\$5,500.00)</b>	<b>-1.39%</b>
	LL	EQUIPMENT LEASE-MAINTAIN/REPAR								
	L46		Print, Photocopying & Micrograph Equipment Maint/Repair	3000	Maintenance Contract	K & A Industries--Badge Printer	\$915.00	\$915.00	\$0.00	0.00%
		<b>Obj Class Totals:</b>					<b>\$915.00</b>	<b>\$915.00</b>	<b>\$0.00</b>	<b>0.00%</b>
	MM	PURCHASED CLIENT/PROGRAM SVCS								
	M03		Purchased Human & Social Services For Clients/Non Medical	3000	Hardship Payments	Economic Hardship Payments--Statutorily Required	\$20,000.00	\$20,000.00	\$0.00	0.00%
				3000	Legislative Mandate	Jockey's Guild--Statutory Requirement	\$65,000.00	\$65,000.00	\$0.00	0.00%
	M04		Services Purch Support of Human/Social Services for Clients	3000	ISA	ISA with DPH Compulsive Gambling--Statutory Requirement	\$70,000.00	\$70,000.00	\$0.00	0.00%
		<b>Obj Class Totals:</b>					<b>\$155,000.00</b>	<b>\$155,000.00</b>	<b>\$0.00</b>	<b>0.00%</b>
	UU	IT Non-Payroll Expenses								
	U02		Telecommunications Services - Voice	3000	Phones	Verizon/AT&T Reduced \$3,000 removed phone lines	\$5,000.00	\$2,000.00	(\$3,000.00)	-60.00%
	U05		Information Technology (IT) Temp Staff Augmentation Profs	3000	Database	Racing Licensing System Reduced \$3,000	\$5,000.00	\$2,000.00	(\$3,000.00)	-60.00%
		<b>Obj Class Totals:</b>					<b>\$10,000.00</b>	<b>\$4,000.00</b>	<b>(\$6,000.00)</b>	<b>-60.00%</b>
	<b>MGC Regulatory Costs</b>			<b>Totals:</b>			<b>\$1,968,738.82</b>	<b>\$2,011,355.03</b>	<b>\$42,616.21</b>	<b>2.16%</b>

Approp	Budget Grouping	Obj Class	Object_name	Unit	Item Short Name	New Description	Current Year Amount	Next Year Amount	Variance	Percent Change
10500003	MGC Mass Racing Development and Oversight									
	Indirect									
		EE	ADMINISTRATIVE EXPENSES							
		E16	Indirect Cost Recoupment	2000	Indirect	N/A	(\$64,357.99)	\$0.00	\$64,357.99	-100.00%
				2000	Indirect Agency Wide	Indirect at 10% of AA, CC, HH, JJ and UU excluding U07	\$204,504.23	\$111,802.56	(\$92,701.67)	-45.33%
			<b>Obj Class Totals:</b>				<b>\$140,146.24</b>	<b>\$111,802.56</b>	<b>(\$28,343.68)</b>	<b>-20.22%</b>
	Indirect		<b>Totals:</b>				<b>\$140,146.24</b>	<b>\$111,802.56</b>	<b>(\$28,343.68)</b>	<b>-20.22%</b>

Approp	Budget Grouping	Obj Class	Object_name	Unit	Item Short Name	New Description	Current Year Amount	Next Year Amount	Variance	Percent Change
10500003	MGC Mass Racing Development and Oversigh									
<b>Appropriation Totals</b>							<b>\$2,108,885.06</b>	<b>\$2,123,157.59</b>	<b>\$14,272.53</b>	<b>0.68%</b>
10500004	Community Mitigation									
	MGC Regulatory Costs									
	AA	REGULAR EMPLOYEE COMPENSATION								
	A01	Salaries: Inclusive	1100	Raises	3% COLA/Incentives/Equity Agency Wide	\$10,188.69	\$6,612.05	(\$3,576.64)	-35.10%	
			1900	Employee Compensation	Regular Employee Salaries	\$203,773.74	\$287,568.97	\$83,795.23	41.12%	
	<b>Obj Class Totals:</b>						<b>\$213,962.43</b>	<b>\$294,181.02</b>	<b>\$80,218.59</b>	<b>37.49%</b>
	BB	REGULAR EMPLOYEE RELATED EXPEN								
	B01	Other Out Of State Travel - INCLUSIVE: AIRFARE, HOTEL, LODGI	1900	Travel	In-State Travel	\$5,000.00	\$5,000.00	\$0.00	0.00%	
	<b>Obj Class Totals:</b>						<b>\$5,000.00</b>	<b>\$5,000.00</b>	<b>\$0.00</b>	<b>0.00%</b>
	DD	PENSION & INSURANCE RELATED EX								
	D09	Fringe Benefit Cost Recoupment	1900	Fringe	Fringe rate of 43.36%	\$88,560.07	\$124,689.90	\$36,129.83	40.80%	
			1900	Taxes	Tax rate of 2.45%	\$4,992.46	\$7,045.44	\$2,052.98	41.12%	
	<b>Obj Class Totals:</b>						<b>\$93,552.52</b>	<b>\$131,735.34</b>	<b>\$38,182.82</b>	<b>40.81%</b>
	EE	ADMINISTRATIVE EXPENSES								
	E01	Office & Administrative Supplies	1900	Supplies	Supplies Binders	\$2,500.00	\$2,500.00	\$0.00	0.00%	
	E16	Indirect Cost Recoupment	1900	Indirect	Indirect Rate of 10%	\$20,377.37	\$0.00	(\$20,377.37)	-100.00%	
	<b>Obj Class Totals:</b>						<b>\$22,877.37</b>	<b>\$2,500.00</b>	<b>(\$20,377.37)</b>	<b>-89.07%</b>
	UU	IT Non-Payroll Expenses								
	U07	Information Technology (IT) Equipment	1900	Database	Services Maintenance/Upgrades to Database	\$50,000.00	\$50,000.00	\$0.00	0.00%	
	<b>Obj Class Totals:</b>						<b>\$50,000.00</b>	<b>\$50,000.00</b>	<b>\$0.00</b>	<b>0.00%</b>
<b>MGC Regulatory Costs Totals:</b>							<b>\$385,392.32</b>	<b>\$483,416.36</b>	<b>\$98,024.04</b>	<b>25.43%</b>

Approp	Budget Grouping	Obj Class	Object_name	Unit	Item Short Name	New Description	Current Year Amount	Next Year Amount	Variance	Percent Change
10500004	Community Mitigation									
<b>Appropriation Totals</b>							<b>\$385,392.32</b>	<b>\$483,416.36</b>	<b>\$98,024.04</b>	<b>25.43%</b>
10501384	Sports Wagering Control Fund									
	MGC Regulatory Costs									
	AA	REGULAR EMPLOYEE COMPENSATION								
	A01	Salaries: Inclusive		1000	Employee Compensation	Admin Employees Salaries	\$258,721.78	\$295,541.82	\$36,820.04	14.23%
				1100	Employee Compensation	HR Employees Salaries	\$159,116.73	\$212,887.49	\$53,770.76	33.79%
				1100	Merit Increases	Intern Program that Could Provide Up to 2 regular and 1 graduate intern	\$0.00	\$37,500.00	\$37,500.00	#Div/0!
				1100	Raises	3% COLA/Incentives/Equity Agency Wide	\$151,408.94	\$113,569.85	(\$37,839.09)	-24.99%
				1200	Employee Compensation	Legal Employees Salaries	\$256,648.70	\$286,841.38	\$30,192.68	11.76%
				1300	Employee Compensation	Exec. Dir. Employees Salaries	\$168,424.97	\$161,743.18	(\$6,681.79)	-3.97%
				1400	Employee Compensation	IT Employees Salaries	\$663,359.59	\$809,995.31	\$146,635.72	22.11%
				1500	Employee Compensation	Commissioners Employees Salaries	\$261,058.70	\$312,802.90	\$51,744.20	19.82%
				1800	Employee Compensation	Communications Employees Salaries	\$63,096.99	\$91,587.60	\$28,490.61	45.15%
				5000	Employee Compensation	Admin Employees Salaries	\$769,907.29	\$1,120,577.07	\$350,669.78	45.55%
				5500	Employee Compensation	N/A	\$213,333.33	\$0.00	(\$213,333.33)	-100.00%
				5500	Employee Compensation	Regular Employee Salaries	\$631,101.39	\$937,652.92	\$306,551.53	48.57%
				7000	Employee Compensation	Regular Employee Salaries	\$184,707.70	\$346,909.48	\$162,201.78	87.82%
				All	Employee Compensation	N/A	\$86,016.58	\$0.00	(\$86,016.58)	-100.00%
				All	Regular Employee Compensation	Turnover Savings 5% of payroll	\$0.00	(\$194,961.58)	(\$194,961.58)	#Div/0!
				<b>Obj Class Totals:</b>			<b>\$3,866,902.69</b>	<b>\$4,532,647.42</b>	<b>\$665,744.73</b>	<b>17.22%</b>
	BB	REGULAR EMPLOYEE RELATED EXPEN								
	B01	Other Out Of State Travel - INCLUSIVE: AIRFARE, HOTEL, LODGI		5000	Travel	Out of State Travel Costs for Sports Wagering	\$0.00	\$10,000.00	\$10,000.00	#Div/0!
				5500	Out of State Travel	Out of State Licensee Visits and Conferences increase for extra FTEs	\$4,000.00	\$5,500.00	\$1,500.00	37.50%
	B02	In-State Travel		5500	In-State Travel	Licensee visits, in-state meetings and conferences Mileage Reimbursements	\$3,000.00	\$3,000.00	\$0.00	0.00%
				<b>Obj Class Totals:</b>			<b>\$7,000.00</b>	<b>\$18,500.00</b>	<b>\$11,500.00</b>	<b>164.29%</b>
	CC	SPECIAL EMPLOYEES								

Approp	Budget Grouping	Obj Class	Object_name	Unit	Item Short Name	New Description	Current Year Amount	Next Year Amount	Variance	Percent Change
10501384	Sports Wagering Control Fund									
	MGC Regulatory Costs									
		C23	Management, Business Professionals & Admin Services	1100	Contract Employee	Administrative Help	\$22,800.00	\$24,000.00	\$1,200.00	5.26%
				5000	Contract Employee	Civilian Investigators	\$124,800.00	\$130,000.00	\$5,200.00	4.17%
		<b>Obj Class Totals:</b>					<b>\$147,600.00</b>	<b>\$154,000.00</b>	<b>\$6,400.00</b>	<b>4.34%</b>
	DD	PENSION & INSURANCE RELATED EX								
	D09	Fringe Benefit Cost Recoupment								
		1000	Fringe	1000	Fringe	Fringe rate of 43.36%	\$112,440.49	\$128,146.93	\$15,706.44	13.97%
		1000	Taxes	1000	Taxes	Tax rate of 2.45%	\$6,338.68	\$7,240.78	\$902.10	14.23%
		1100	Fringe	1100	Fringe	Fringe rate of 43.36%	\$69,152.13	\$92,308.02	\$23,155.89	33.49%
		1100	Taxes	1100	Taxes	Tax rate of 2.45%	\$3,898.36	\$5,215.74	\$1,317.38	33.79%
		1200	Fringe	1200	Fringe	Fringe rate of 43.36%	\$102,182.68	\$124,374.42	\$22,191.74	21.72%
		1200	Taxes	1200	Taxes	Tax rate of 2.45%	\$5,764.21	\$7,027.61	\$1,263.40	21.92%
		1300	Fringe	1300	Fringe	Fringe rate of 43.36%	\$59,647.12	\$86,117.44	\$26,470.32	44.38%
		1300	Taxes	1300	Taxes	Tax rate of 2.45%	\$3,362.53	(\$12,022.90)	(\$15,385.43)	-457.56%
		1400	Fringe	1400	Fringe	Fringe rate of 43.36%	\$288,267.92	\$351,213.97	\$62,946.05	21.84%
		1400	Taxes	1400	Taxes	Tax rate of 2.45%	\$16,252.31	\$19,844.89	\$3,592.58	22.11%
		1500	Fringe	1500	Fringe	Fringe rate of 43.36%	\$113,456.11	\$135,631.34	\$22,175.23	19.55%
		1500	Taxes	1500	Taxes	Tax rate of 2.45%	\$6,395.94	\$7,663.67	\$1,267.73	19.82%
		1800	Fringe	1800	Fringe	Fringe rate of 43.36%	\$27,421.95	\$39,712.37	\$12,290.42	44.82%
		1800	Taxes	1800	Taxes	Tax rate of 2.45%	\$1,545.88	\$2,243.90	\$698.02	45.15%
		5000	Fringe	5000	Fringe	Fringe rate of 43.36%	\$47,499.76	\$485,882.22	\$438,382.46	922.92%
		5000	Taxes	5000	Taxes	Tax rate of 2.45%	\$305,894.71	\$27,454.14	(\$278,440.57)	-91.02%
		5000	Taxes	5000	Taxes	Tax rate of 2.45% on Civilian Investigators	\$3,057.60	\$2,697.35	(\$360.25)	-11.78%
		5500	Fringe	5500	Fringe	Fringe rate of 43.36%	\$274,106.66	\$406,566.31	\$132,459.65	48.32%
		5500	Fringe and Taxes	5500	Fringe and Taxes	N/A	\$97,728.00	\$0.00	(\$97,728.00)	-100.00%
		5500	Taxes	5500	Taxes	Tax rate of 2.45%	\$15,461.99	\$22,972.50	\$7,510.52	48.57%
		7000	Fringe	7000	Fringe	Fringe rate of 43.36%	\$4,525.34	\$150,419.95	\$145,894.61	3223.95%
		7000	Taxes	7000	Taxes	Tax rate of 2.45%	\$80,273.97	\$8,499.28	(\$71,774.69)	-89.41%
		All	Fringe and Payroll Taxes	All	Fringe and Payroll Taxes	Fringe and Payroll Taxes on Turnover Savings (45.81%)	\$0.00	(\$89,311.90)	(\$89,311.90)	#Div/0!
		All	Fringe and Taxes	All	Fringe and Taxes	N/A	\$39,404.19	\$0.00	(\$39,404.19)	-100.00%
		<b>Obj Class Totals:</b>								
							<b>\$1,684,078.51</b>	<b>\$2,009,898.03</b>	<b>\$325,819.52</b>	<b>19.35%</b>
	EE	ADMINISTRATIVE EXPENSES								
	E02	Printing Expenses & Supplies								
		5500	Printing & Administrative Supplies	5500	Printing & Administrative Supplies	SW Reports and Ad Hoc Reports Additional \$500 for Reporting	\$1,500.00	\$2,000.00	\$500.00	33.33%
	E12	Subscriptions, Memberships & Licensing Fees								
		5500	Subscriptions, Memberships & Licensing Fees	5500	Subscriptions, Memberships & Licensing Fees	SBRA membership, trade journals other subscriptions	\$7,500.00	\$7,500.00	\$0.00	0.00%

Approp	Budget Grouping	Obj Class	Object_name	Unit	Item Short Name	New Description	Current Year Amount	Next Year Amount	Variance	Percent Change	
10501384	Sports Wagering Control Fund										
	MGC Regulatory Costs										
		E30	Credit Card Purchases	5500	Credit Card Purchases	Credit Card Purchases	\$5,000.00	\$5,000.00	\$0.00	0.00%	
		E41	Out Of State Travel Expen on Behalf of State Employ	5000	Travel Agent	Travel for Sports Wagering	\$0.00	\$35,000.00	\$35,000.00	#Div/0!	
				5500	Travel Agent	Travel Agency Fees increase for additional FTEs	\$8,000.00	\$13,000.00	\$5,000.00	62.50%	
		EE2	Conference, Training and Registration Fees	5000	Conferences	Conferences for Sports Wagering	\$0.00	\$15,000.00	\$15,000.00	#Div/0!	
				5500	Conference, Training and Registration Fees	UNLV; G2E; NAGRA or SBRA meeting, GLI Roundtables Increase 2,000 for additional FTEs	\$12,500.00	\$14,850.00	\$2,350.00	18.80%	
		<b>Obj Class Totals:</b>						<b>\$34,500.00</b>	<b>\$92,350.00</b>	<b>\$57,850.00</b>	<b>167.68%</b>
	GG	ENERGY COSTS AND SPACE RENTAL									
		G01	Space Rental	1000	Office Lease	101 Federal St. First 6 months \$677,728.64 old lease costs, second 6 months at discount for first year of renewal \$654,850.20, 3 months of old lease for free for renewing 5 years (\$333,864.32). Total FY 25 Lease costs \$988,714.52. 70% to Gaming--\$692,1	\$378,375.22	\$296,614.36	(\$81,760.86)	-21.61%	
				1500	75-101 Parking Garage	Parking 75-101--5 spaces. Two of the spaces are included in the lease. This item pays for 3 of the spaces.	\$5,437.80	\$5,437.80	\$0.00	0.00%	
		G03	Electricity	1000	Electricity	101 Federal St. 12 months	\$9,301.10	\$9,301.10	\$0.00	0.00%	
		<b>Obj Class Totals:</b>						<b>\$393,114.12</b>	<b>\$311,353.26</b>	<b>(\$81,760.86)</b>	<b>-20.80%</b>
	HH	CONSULTANT SVCS (TO DEPTS)									
		H09	Attorneys/Legal Services	1200	Outside Counsel	Outside Counsel - A&K	\$200,000.00	\$200,000.00	\$0.00	0.00%	
		H23	Program Coordinators	5500	Consultant	Marketing Audit Consultant	\$0.00	\$20,000.00	\$20,000.00	#Div/0!	
				5500	Consultants	N/A	\$120,000.00	\$0.00	(\$120,000.00)	-100.00%	
		HH1	Financial Services	5000	Consultants	Consultants -RSM	\$622,297.00	\$0.00	(\$622,297.00)	-100.00%	
				5000	Consultants	Consultants -RSM--Vendor License Reviews for Sports Wagering	\$750,000.00	\$1,242,214.29	\$492,214.29	65.63%	
		<b>Obj Class Totals:</b>						<b>\$1,692,297.00</b>	<b>\$1,462,214.29</b>	<b>(\$230,082.71)</b>	<b>-13.60%</b>
	JJ	OPERATIONAL SERVICES									
		J25	Laboratory & Pharmaceutical Services	5000	State Police	adjust down to 4 additonal FTE related to Sports Wagering	\$0.00	\$461,595.28	\$461,595.28	#Div/0!	
				5000	State Police	shifted costs to 4 additional trooper for Sports Wagering	(\$250,000.00)	\$0.00	\$250,000.00	-100.00%	
				5000	State Police	shifted costs to 4 additional trooper for Sports Wagering	\$541,519.27	\$0.00	(\$541,519.27)	-100.00%	
		<b>Obj Class Totals:</b>						<b>\$291,519.27</b>	<b>\$461,595.28</b>	<b>\$170,076.01</b>	<b>58.34%</b>
	OO										
		O99		1300	Consulting and Payroll	N/A	(\$431,061.33)	\$0.00	\$431,061.33	-100.00%	

Approp	Budget Grouping	Obj Class	Object_name	Unit	Item Short Name	New Description	Current Year Amount	Next Year Amount	Variance	Percent Change
10501384	Sports Wagering Control Fund									
	MGC Regulatory Costs									
		O99		1300	Consulting and Payroll	Sports Wagering Set Aside for FY24 Build Out of SW Regulatory Environment	\$750,000.00	\$0.00	(\$750,000.00)	-100.00%
		<b>Obj Class Totals:</b>					<b>\$318,938.67</b>	<b>\$0.00</b>	<b>(\$318,938.67)</b>	<b>-100.00%</b>
	UU	IT Non-Payroll Expenses								
	U02	Telecommunications Services - Voice		1400	TELECOMMUNICAT IONS SERVICES - VOICE	OfficeSuite (Voice, HD Meeting, WeConnect), Verizon Wireless, Multi-location fax lines	\$32,122.38	\$32,122.38	\$0.00	0.00%
	U03	Software & Information Technology Licenses (IT)		1000	Software	Software - LinkSquares CLM	\$14,250.00	\$14,250.00	\$0.00	0.00%
				1100	Software	Software - BambooHR	\$4,275.00	\$0.00	(\$4,275.00)	-100.00%
				1200	Software	Relativity Document Search and PIR Tool Replacement for Relativity	\$155,000.00	\$155,000.00	\$0.00	0.00%
				1400	SOFTWARE & INFORMATION TECHNOLOGY LICENSES (IT)	Increase \$86,671.56 for Azure Sentinel, M365 G5 Compliance, M365 G5 Security Adobe, Sharepoint, O365, Azure, JIRA, MDM etc	\$154,464.88	\$154,464.88	\$0.00	0.00%
				5500	software	Incident Tracker Increase for actual cost of @5,000 plus additional modifications	\$3,800.00	\$10,500.00	\$6,700.00	176.32%
				7000	Software	Licensing System Software	\$0.00	\$150,000.00	\$150,000.00	#Div/0!
	U05	Information Technology (IT) Temp Staff Augmentation Profs		5500	IT Consultant	IT Consultant - GLI	\$60,000.00	\$60,000.00	\$0.00	0.00%
				5500	IT Consultant	IT Consultant - GLI - ICS	\$0.00	\$40,000.00	\$40,000.00	#Div/0!
	U06	Information Technology (IT) Cabling		1400	IT Cabling	Raynham Build out	\$54,531.48	\$54,531.48	\$0.00	0.00%
				1400	IT Cabling	Suffolk Build out new \$26,050.08 in one time costs Suffolk Build out	\$54,531.48	\$54,531.48	\$0.00	0.00%
	U07	Information Technology (IT) Equipment		1400	IT Equipment	IT Equipment, emergency replacements (switches, routers, firewalls) etc	\$41,325.00	\$41,325.00	\$0.00	0.00%
	U09	Information Technology (IT) Equip Rental Or Lease		1400	INFORMATION TECHNOLOGY (IT) EQUIP RENTAL OR LEASE	ACS Leases (Refresh)	\$35,823.08	\$35,823.08	\$0.01	0.00%
	U10	Information Tech (IT) Equipment Maintenance & Repair		1400	IT Maintenance and Repair	Annual M&S Equipment/Services	\$37,563.79	\$37,563.79	\$0.00	0.00%
	U11	Information Technology (IT) Contract Services		1400	IT Contract Services	LMS, Gartner, Tallan Services	\$77,239.85	\$77,239.85	\$0.01	0.00%
				7000	IT Consultant	Licensing System Implementation	\$0.00	\$112,500.00	\$112,500.00	#Div/0!
		<b>Obj Class Totals:</b>					<b>\$724,926.93</b>	<b>\$1,029,851.94</b>	<b>\$304,925.01</b>	<b>42.06%</b>
	<b>MGC Regulatory Costs</b>		<b>Totals:</b>				<b>\$9,160,877.19</b>	<b>\$10,072,410.22</b>	<b>\$911,533.03</b>	<b>9.95%</b>

Approp	Budget Grouping	Obj Class	Object_name	Unit	Item Short Name	New Description	Current Year Amount	Next Year Amount	Variance	Percent Change
10501384	Sports Wagering Control Fund									
	Indirect									
		EE	ADMINISTRATIVE EXPENSES							
		E16	Indirect Cost Recoupment	2000	Indirect	Commonwealth Required Indirect Cost Recoupment	\$440,545.25	\$520,356.13	\$79,810.88	18.12%
				2000	Indirect	N/A	\$37,229.70	\$0.00	(\$37,229.70)	-100.00%
			<b>Obj Class Totals:</b>				<b>\$477,774.95</b>	<b>\$520,356.13</b>	<b>\$42,581.18</b>	<b>8.91%</b>
	Indirect		<b>Totals:</b>				<b>\$477,774.95</b>	<b>\$520,356.13</b>	<b>\$42,581.18</b>	<b>8.91%</b>



Approp	Budget Grouping	Obj Class	Object_name	Unit	Item Short Name	New Description	Current Year Amount	Next Year Amount	Variance	Percent Change
10501384	Sports Wagering Control Fund									
	Research and Responsible Gaming/PHTF									
		UU	IT Non-Payroll Expenses							
		U03	Software & Information Technology Licenses (IT)	1700	software	100 VSE database licenses	\$12,100.00	\$12,100.00	\$0.00	0.00%
		<b>Obj Class Totals:</b>					<b>\$12,100.00</b>	<b>\$12,100.00</b>	<b>\$0.00</b>	<b>0.00%</b>
	Research and Responsible Gaming/PHTF	<b>Totals:</b>					<b>\$12,100.00</b>	<b>\$12,100.00</b>	<b>\$0.00</b>	<b>0.00%</b>

Approp	Budget Grouping	Obj Class	Object_name	Unit	Item Short Name	New Description	Current Year Amount	Next Year Amount	Variance	Percent Change
10501384	Sports Wagering Control Fund									
	Office of Attorney General and AGO MSP									
		00								
		099		9000	Attorney General	SW ISA with AGO for Enforcement Activities	\$500,000.00	\$500,000.00	\$0.00	0.00%
		<b>Obj Class Totals:</b>					<b>\$500,000.00</b>	<b>\$500,000.00</b>	<b>\$0.00</b>	<b>0.00%</b>
	Office of Attorney General and AGO MSP					<b>Totals:</b>	<b>\$500,000.00</b>	<b>\$500,000.00</b>	<b>\$0.00</b>	<b>0.00%</b>

Approp	Budget Grouping	Obj Class	Object_name	Unit	Item Short Name	New Description	Current Year Amount	Next Year Amount	Variance	Percent Change
10501384	Sports Wagering Control Fund									
<b>Appropriation Totals</b>							\$10,150,752.14	\$11,104,866.35	\$954,114.21	9.40%
40001101	MGC Regulatory Costs									
	AA	REGULAR EMPLOYEE COMPENSATION								
	A01	Salaries: Inclusive	1100	Raises	3% COLA/Incentives/Equity Agency Wide	\$15,951.45	\$10,733.14	(\$5,218.31)	-32.71%	
	<b>Obj Class Totals:</b>					\$15,951.45	\$10,733.14	(\$5,218.31)	-32.71%	
MGC Regulatory Costs		<b>Totals:</b>				\$15,951.45	\$10,733.14	(\$5,218.31)	-32.71%	

Approp	Budget Grouping	Obj Class	Object_name	Unit	Item Short Name	New Description	Current Year Amount	Next Year Amount	Variance	Percent Change
40001101										
Research and Responsible Gaming/PHTF										
		AA	REGULAR EMPLOYEE COMPENSATION							
		A01	Salaries: Inclusive	1700	Employee Compensation	Employee Salaries Possible Intern	\$319,029.04	\$357,771.35	\$38,742.31	12.14%
		<b>Obj Class Totals:</b>					<b>\$319,029.04</b>	<b>\$357,771.35</b>	<b>\$38,742.31</b>	<b>12.14%</b>
		BB	REGULAR EMPLOYEE RELATED EXPEN							
		B01	Other Out Of State Travel - INCLUSIVE: AIRFARE, HOTEL, LODGI	1700	Travel	Out of State Travel	\$1,250.00	\$1,250.00	\$0.00	0.00%
		B02	In-State Travel	1700	Travel	In-State-Travel Reimbursements	\$6,000.00	\$6,000.00	\$0.00	0.00%
		<b>Obj Class Totals:</b>					<b>\$7,250.00</b>	<b>\$7,250.00</b>	<b>\$0.00</b>	<b>0.00%</b>
		DD	PENSION & INSURANCE RELATED EX							
		D09	Fringe Benefit Cost Recoupment	1700	Fringe	Fringe rate of 43.36%	\$138,650.02	\$155,129.66	\$16,479.64	11.89%
				1700	Taxes	Tax rate of 2.45%	\$7,816.21	\$8,765.40	\$949.19	12.14%
		<b>Obj Class Totals:</b>					<b>\$146,466.23</b>	<b>\$163,895.06</b>	<b>\$17,428.83</b>	<b>11.90%</b>
		EE	ADMINISTRATIVE EXPENSES							
		E02	Printing Expenses & Supplies	1700	Printing Expenses and Supplies	Printed Materials for Game Sense	\$6,000.00	\$6,000.00	\$0.00	0.00%
		E12	Subscriptions, Memberships & Licensing Fees	1700	Memberships	Memberships - NAADGS, NCPG	\$6,000.00	\$6,000.00	\$0.00	0.00%
		E16	Indirect Cost Recoupment	1700	Indirect Charges	Indirect to EHHS	\$398,902.90	\$403,850.43	\$4,947.53	1.24%
		EE2	Conference, Training and Registration Fees	1700	Conferences	Conference, Training & Registration Fees	\$10,000.00	\$10,000.00	\$0.00	0.00%
		<b>Obj Class Totals:</b>					<b>\$420,902.90</b>	<b>\$425,850.43</b>	<b>\$4,947.53</b>	<b>1.18%</b>
		FF	FACILITY OPERATIONAL EXPENSES							
		F16	Library & Teaching Supplies & Materials	1700	Books	Library/reference books Increase as needed for research	\$1,000.00	\$1,000.00	\$0.00	0.00%
		<b>Obj Class Totals:</b>					<b>\$1,000.00</b>	<b>\$1,000.00</b>	<b>\$0.00</b>	<b>0.00%</b>
		HH	CONSULTANT SVCS (TO DEPTS)							
		H09	Attorneys/Legal Services	1700	Public Safety Research	Public Safety and Human Trafficking Research	\$115,000.00	\$115,000.00	\$0.00	0.00%
		H23	Program Coordinators	1700	Branding	GameSense media buys etc. ASG	\$150,000.00	\$150,000.00	\$0.00	0.00%
				1700	Mass Council	Mass Council on Gaming & Health including employees to man Game Sense booth at PPC EBH and MGM --Staffed 16 hrs per day PPC and MGM, and 24 Hrs/day EBH --VSE --Play My Way --Required by Statute Chapter 194, Section 9	\$3,148,000.00	\$3,148,000.00	\$0.00	0.00%
				1700	Program manager	RG Evaluation including GameSense	\$125,000.00	\$125,000.00	\$0.00	0.00%
				1700	Research Consultant	Research Review Committee	\$30,000.00	\$30,000.00	\$0.00	0.00%
				1700	Translations	Knowledge Translation and Exchange	\$25,000.00	\$25,000.00	\$0.00	0.00%

Approp	Budget Grouping	Obj Class	Object_name	Unit	Item Short Name	New Description	Current Year Amount	Next Year Amount	Variance	Percent Change
40001101										
Research and Responsible Gaming/PHTF										
		H23	Program Coordinators	1700	VSE Resource Liaison	VSE Resource Liaison	\$62,000.00	\$62,000.00	\$0.00	0.00%
<b>Obj Class Totals:</b>							<b>\$3,655,000.00</b>	<b>\$3,655,000.00</b>	<b>\$0.00</b>	<b>0.00%</b>
<i>JJ OPERATIONAL SERVICES</i>										
		JJ2	Auxiliary Services	1700	Translations	Document Translations Increase due to greater need for translation and diversity	\$15,000.00	\$15,000.00	\$0.00	0.00%
<b>Obj Class Totals:</b>							<b>\$15,000.00</b>	<b>\$15,000.00</b>	<b>\$0.00</b>	<b>0.00%</b>
<i>PP STATE AID/POL SUB</i>										
		P01	Grants To Public Entities	1700	Community Driven Research	Community Driven Research	\$210,000.00	\$210,000.00	\$0.00	0.00%
				1700	Data Storage Grant	MODE DPH	\$75,000.00	\$75,000.00	\$0.00	0.00%
				1700	SEIGMA	Social & Economic Research(SEIGMA) Follow-up General Population Study	\$995,000.00	\$995,000.00	\$0.00	0.00%
		PP1	Grants To Non-Public Entities	1700	PMW	Play My Way Incentives	\$40,000.00	\$40,000.00	\$0.00	0.00%
<b>Obj Class Totals:</b>							<b>\$1,320,000.00</b>	<b>\$1,320,000.00</b>	<b>\$0.00</b>	<b>0.00%</b>
<b>Research and Responsible Gaming/PHTF Totals:</b>							<b>\$5,884,648.17</b>	<b>\$5,945,766.84</b>	<b>\$61,118.67</b>	<b>1.04%</b>

Approp	Budget Grouping	Obj Class	Object_name	Unit	Item Short Name	New Description	Current Year Amount	Next Year Amount	Variance	Percent Change
40001101										
<b>Appropriation Totals</b>							\$5,900,599.62	\$5,956,499.98	\$55,900.36	0.95%



# TRIBAL LITIGATION UPDATE

*A SUMMARY OF THE CURRENT STATE OF AFFAIRS*

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JUSTIN STEMPECK – DEPUTY GENERAL COUNSEL

JUNE 20, 2024

# INDIAN REORGANIZATION ACT

- “The Indian Reorganization Act (IRA or Act) authorizes the Secretary of the Interior...to acquire land and hold it in trust ‘for the purpose of providing land for Indians.’” *Carcieri v. Salazar*, 555 U.S. 379, 381-82 (2009) (citing 25 U.S.C. § 465)
- “The Secretary’s authority under the IRA is cabined by whether a tribe meets the statute’s definition of ‘Indian,’ found in Section 19 of the [IRA] and codified at 25 U.S.C. § 5129 . . . .” *Mashpee Wampanoag Tribe v. Zinke*, 2019 WL 2569919, \*1 (D.D.C. July 21, 2019).





# BRIEF HISTORY

- 2015 Initial DOI land in trust decision
- Citizens challenge in D. Mass, D. Mass remands decision back to DOI to evaluate whether Tribe was “under Federal jurisdiction”
- 2018 Interior reverses itself, concludes it lacked authority to hold land in trust because Tribe was not under Federal jurisdiction when IRA passed in 1934
- Tribe challenges DOI in 2018 in District of Columbia, court concludes that DOI misapplied precedent, remands back to DOI
- 2021 DOI issues 3<sup>rd</sup> and final land in trust decision finding Tribe does have land in trust
- Citizens challenge the DOI again in D.Mass, claims are rejected, they appeal
- 1<sup>st</sup> Cir affirms the District Court and the DOI 3<sup>rd</sup> decision
- Citizens appeal to Supreme Court



# DEVELOPMENTS SINCE NOVEMBER 2023

- The Supreme Court denied the citizen petition for certiorari on 4/1/24
- No written decision issued
- DOI final land in trust decision from 2021 stands



# NEXT STEPS

- Legal challenges involving the Mashpee have all resolved and casino development plans may move forward
- The relationship between the Commonwealth and the Mashpee regarding gaming is set by the state-tribal compact entered into in 2013
- The compact contemplates a gaming operation in Taunton, which is in Region C



# COMMISSION ROLE IN TRIBAL OPERATIONS

- Commission role with respect to the tribal gaming operations (partial list)
  - Tribe will have its own gaming commission responsible for operating and regulating the enterprise
  - Tribe must provide MGC with various construction related documents
  - MGC may designate inspection agents to inspect the Tribal facility
  - Tribe will forward internal controls and description of security systems to MGC for review and comment prior to operation
  - Electronic gaming devices at the facility will record their activity and such activity will be accessible by the MGC
  - Tribe must submit a certified financial audit of the gaming enterprise each fiscal year to the MGC
  - MGC has a right to inspect the facility, including review of records
  - Tribe may contract out background investigations to the MGC
  - Tribe will notify MGC of intent to license/register all applicants
  - MGC right to object to gaming activity and arbitration
  - Gaming device certificates provided to MGC



# COMMISSION ROLE CONTINUED

- MGC right of review and comment on internal controls / security plan
- Tribe reimburses the MGC for incurred costs of carrying out obligations in the Compact
- Quarterly payment of 17% of GGR to the MGC
- Tribe is authorized to offer Sports Wagering online as Sports Wagering falls under the definition of “Internet Gaming” in the Compact

If Internet Gaming is authorized by the Commonwealth and permitted to be conducted by any Category 1 Licensee or other commercial entity licensed by the Commonwealth, the Tribe may conduct Internet Gaming in the same manner and to the same extent that Internet Gaming is permitted to be conducted in the Commonwealth by any Category 1 Licensee or other licensed commercial entity, provided the Tribe first complies with subpart 4.4 of this Compact.



**Bally Bet Sports House Rules (Massachusetts)**  
**Last Updated: June 10, 2024**

These Bally Bet House Rules (Section I) together with the Additional Sports Wagering Rules (Section II) (collectively, the "Sports House Rules") govern the use of the Bally Bet Platform (as defined in the Bally Bet General Terms and Conditions) and are part of the Bally Bet General Terms and Conditions. The Sports House Rules apply in relation to the markets offered and bets placed on the Bally Bet Platform.

Bally's reserves the right to amend the Sports House Rules at any time subject to regulatory approval by the Massachusetts Gaming Commission. Any such revision will be binding and effective immediately upon notification to customers of such rule changes and any bets accepted after the rule changes have been posted shall be governed by the updated Sports House Rules.

Bally Bet Patrons should make themselves aware of all the Sports House Rules, including the Additional Sports Wagering Rules, affecting any market on which they wish to place a bet.

**I. HOUSE RULES**

**A. TYPE OF WAGERS ACCEPTED**

- (1) "Match" (aka 1X2) is where it is possible to bet on the (partial or definite) outcome of a match or event. The options are: "1" = Home team/Player 1, or the participant listed to the left side of the offer; "X" = Draw/Tie, or the selection in the middle; "2" = Away team/Player 2, or the participant listed to the right side of the offer. In particular instances or specific competitions, Bally Bet might display an offer in the so-called "American" format (ie: Away Team @ Home Team), where the host team is listed following the visiting team. Irrespective of the positioning of the teams on the board/betslip, the references to "Home" and "Away" teams will always refer to the actual teams playing at home (host) and away (visitor) respectively, as determined by the official organization bar the exceptions as detailed in individual sport rules.
- (2) "Correct Score" (aka Result Betting) is where it is possible to bet on the (partial or definite) exact score of a match/event, or part of it.
- (3) "Over/Under" (aka Totals) is where it is possible to bet on the (partial or definite) amount of a predefined occurrence (e.g. goals, points, corners, rebounds, penalty minutes, etc.). Should the total amount of the listed occurrences be exactly equal to the betting line, then all bets on this offer will be declared void. Example: an offer where the betting line is 128.0 points and the match ends with the result 64-64 will be declared void.
- (4) "Odd/Even" is where it is possible to bet on the (partial or definite) amount of a predefined occurrence (e.g. goals, points, corners, rebounds, penalty minutes, etc.). "Odd" is 1, 3, 5 etc.; "Even" is 0, 2, 4 etc.
- (5) A "Head-to-Head" and/or "Triple-Head" is a competition between two or three participants/outcomes, originating from either an officially organized event, or else, as virtually defined by Bally Bet.

- (6) "Half time/Full time" is where it is possible to bet on the result in Half time and the outcome at the end of the listed timeframe. E.g. if at Half time the home team is leading 1-0 and the match ends 1-1, the winning outcome is 1/X. Bets on this market will be declared void should the match be played in a format where it is impossible to determine an outcome based on the timeframes listed within the offer.
- (7) "Period betting" is where it is possible to bet on the outcome of each separate period within a match/event. E.g. If the period scores in an ice hockey match are 2-0 / 0-1 / 1-1, the winning outcome is 1/2/X. Bets on this market will be declared void should the match be played in a format where it is impossible to determine an outcome based on the timeframes listed within the offer.
- (8) "Draw No Bet" (aka Moneyline) is where it is possible to bet on either "1" or "2". It is also common practice to refer to "Draw No Bet" in cases where no draw odds are offered. Bets will be voided should the specific match/event not produce any winning outcome (E.g. match ends as a draw), or the occurrence not happen (E.g. First Goal, Draw No Bet and match ends 0-0).
- (9) "Handicap" (aka Spread) is where it is possible to bet on whether the chosen outcome will be victorious once the listed handicap is added/subtracted (as applicable) to the match/period/total score to which the bet refers to. In those circumstances where the result after the adjustment of the handicap line is exactly equal to the betting line, then all bets on this offer will be declared void. Example: a bet on -3.0 goals will be declared void if the chosen team wins the match by exactly 3 goals difference (3-0,4-1, 5-2, etc). Any reference in this section to the term "margin" is intended to be understood as the outcome emerging from the subtraction of the goals/points scored by the 2 teams/participants.

Unless otherwise stated, all handicaps listed on the Bally Bet Platform are to be calculated based on the result from the start of the listed match/period to the end of the specified match/period. It is however customary that for certain handicap bet offers in specific sports (Asian Handicap in Football), only the outcomes obtained from the time of bet placement until the end of the listed timeframe will be taken into consideration, thus disregarding any goals/points scored before the time the bet was placed and accepted. Any bet offer with these characteristics will be clearly displayed on site and highlighted in the bettors' Bet History with the score at the time of bet placement.

There are 3 different "handicap betting" formats:

- (1) 2-way Handicap: Team A (-1.5) vs Team B (+1.5)

Example:

- Team A is given a -1.5 goal handicap in the match. For the bet to be won, Team A must

win the match with a margin equal or bigger than the listed handicap (ie. 2 goals or more).

- Team B is given a +1.5 goal advantage in the match. For the bet to be won, Team B must either win the match, match finish in a draw or not lose with a margin equal or bigger than their listed advantage (ie. lose with a 1 goal margin).

## (2) 3-way Handicap: Team A (-2) Draw (Exactly 2) Team B (+2)

Example:

- Team A is given a 2 goal handicap in the match. For the bet to be won, Team A must win the match with a bigger margin than the listed handicap (ie. 3 goals or more).
- Draw would be the victorious outcome should the match end up with exactly the listed margin (ie. match ends with results such as 2-0, 3-1 and 4-2).
- Team B is given a 2 goal advantage in the match. For the bet to be won, Team B must either win the match, match finish in a draw or not lose with a margin equal or bigger than their listed advantage (ie. lose with only a 1 goal margin).

## (3) Asian Handicap: Team A (-1.75) vs Team B (+1.75)

Example:

- Team A is given a -1.75 goal handicap in the match. This means that the stake is divided into 2 equal bets and placed on the outcomes -1.5 and -2.0. For the bet to be fully paid out at the listed odds, Team A must win the match with a bigger margin than both of their listed handicaps (ie. 3 goals or more margin). In the eventuality that Team A wins with only a 2 goal margin, the bet will be considered as partially won with a full payout on the -1.5 part of the bet and a refund on the -2.0 side since the outcome on that part of the bet would be considered a "tie". Should the match produce any other outcome, including a Team A victory with only 1 goal of margin, the whole stake would be lost.
- Team B is given a +1.75 goal advantage in the match. This means that the stake is divided into 2 equal bets and placed on the outcomes +1.5 and +2.0. For the bet to be fully paid out at the listed odds, Team B must either win the match, match finish in a draw or not lose with a margin equal or bigger than any of their listed advantages (ie. lose with only a 1 goal margin). In the eventuality that Team B loses with exactly a 2 goal margin, the bet will be considered as partially lost with a refund on the -2.0 part of the bet and a loss on the -1.5



part of the bet. Should the match produce any other outcome which results in a defeat of Team B with a margin of 3 or more goals, the whole stake would be lost.

(10)"Double Chance" is where it is possible to bet simultaneously on two (partial or definite) outcomes of a match or event. The options are: 1X, 12 and X2 with "1", "X" and "2".

(11)"Outright" or "Place" betting is where it is possible to choose from a list of alternatives and bet on the eventuality that a participant wins or places within a specified position in the classification of the listed event/competition. Should two or more participants share finishing positions, the settlement will be based on the Dead Heat Rule.

(12)An "Each Way" bet (aka EW) refers to a bet where the chosen selection must either Win or else Place within the payout terms. The bet is divided in two parts (the "Win" part and the "Place" part) of an equal stake. Settlement of such bets will take into account the applicable rules governing the "Win" and "Place" bets, namely the Sport-specific rules.

(13)"Goal minutes" is where it is possible to bet on the sum of the minutes when the goals have been scored. When settling such bets, goals scored in injury time of both halves are to be considered as having been scored in the 45th minute in case the goal was scored in the first half injury time and the 90th minute in case the goal was scored in the second half injury time. Own goals will not count towards the settlement of individual player's 'goal minutes'.

(14)Player Propositions or "Props" refers to a bet on a verifiable statistical result of an individual player or group of players within a wagering event. Examples include: Over or Under 1.5 touchdown passes for a Quarterback, Over or Under 55.5 Rebounds + Points + Assists for a Point Guard, First touchdown scorer in an NFL game, anytime goal scorer in a soccer match.

**B. METHOD FOR CALCULATION AND PAYMENT OF WINNING SPORTS WAGERS**

Patrons may choose to display odds on their wagering screen in American or Decimal format. However, all payout calculations for wagers will be calculated based on Decimal odds, irrespective of any other format a patron chooses to display on their account at the time of bet placement. This may result in rounding differences between an expected payout and actual payout. The exact actual payout amount will be shown to the patron at the time of bet placement, which will only be altered in the case of voids, pushes, or allowable deductions (e.g. Dead Heat Rule, tax withholding).

Below is a table that shows the decimal odds that are used for payout calculations by the system, the corresponding US odds (shown on the betslip) and what the exact decimal odds would be based on the US odds (Decimal odds from US).

True Decimal Odds	US Odds	Decimal Odds from US
1.41	-245	1.408
1.48	-210	1.476
1.56	-180	1.556
1.74	-136	1.735

1.91	-110	1.909
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For example, if a patron wagers \$100 at decimal odds of 1.91, which will be presented in American odds as -110, the patron will get a payout of \$191 rather than \$190.9.

### **C. EFFECT OF SCHEDULING CHANGES AND/OR CANCELLED SPORTING EVENTS**

Unless otherwise stated either in the Sport-Specific rules or in conjunction with the bet offer, specific events forming part of tournaments/competitions which are not held, get postponed and/or rescheduled for a time/date longer than 12 hours from the last scheduled time issued by the governing body due to bad weather, crowd trouble or similar scenarios will be declared void with the following exceptions where bets will remain valid:

- (1) Events which starting times have not been officially confirmed yet by the governing body at time of bet placement.
- (2) Events which are moved due to scheduling conflicts/tv broadcasts but remain scheduled to be played within the same matchday/game week/round (as applicable) and the change does not change the order of official fixtures for any of the participants in the offer.
- (3) Events which start times are anticipated (brought forward) but remain scheduled to be played within the same matchday/game week/round (as applicable) and, without prejudice to past-posting and similar occurrences, the change does not modify the order of official fixtures for any of the participants in the offer.

### **D. PROCESS FOR HANDLING INCORRECTLY POSTED SPORTING EVENTS, ODDS, OR RESULTS**

"Obvious Error" is a mistake, misprint, misinterpretation, mishearing, misreading, mistranslation, spelling mistake, technical hazard, registration error, transaction error, manifest error, force majeure and/or similar, which may or may not be apparent to Bally's and/or the Account Holder at the relevant time, which has caused or resulted in bets being offered and/or accepted. Examples of errors include, but are not limited to:

- (1) As a result of failure of established risk management controls.
- (2) As a result of inappropriate manipulation of offers or settlement procedures as well as any fraudulent activity.
- (3) Incorrect payouts.
- (4) Cyber attacks.
- (5) Bets accepted;
  - a. During technical problems that would otherwise not have been accepted; at odds/prices that have been increased, improved or enhanced from the odds/prices that would have otherwise been offered.
  - b. On events/offers that have already been decided or concluded, or in relation to which Bally's had suspended betting.
  - c. On events/offers after the event/match/offer has started (except for live betting bet types).
  - d. On markets/events containing participants that are not part of the event.
  - e. Otherwise than in accordance with the applicable laws.

- f. At odds that are materially different from those available in the general betting industry at the time the bet was accepted, whereby Bally Bet will use a majority of betting industry operators, to determine whether odds offered were “materially different”.
- g. At odds which reflect an incorrect score, standing or ranking situation, including where incorrect odds are offered, as a result of any errors or omissions made in respect of the announcing, publishing, or reporting of a score, standing or ranking situation.
- h. At incorrect odds where it is clear that the actual chances of the event occurring at the time the bet was accepted were materially different, or
- i. That the bet has been placed by someone other than the Account Holder (including where someone has gained access to the Account holders’ account) or where the Account Holder is victim of fraudulent activity.

All wagers accepted in Obvious Error will be voided, subject to approval from the Massachusetts Gaming Commission. Should a wager accepted in Obvious Error be part of an otherwise non-erroneous combination bet (e.g. parlay), only the specific leg where the Obvious Error occurred will be voided. Remaining legs will remain valid with reduced payout calculation based on odds of all other legs.

#### **E. METHODS OF NOTIFYING PATRONS OF ODDS OR PROPOSITION CHANGES**

All odds offered are subject to variation. Such fluctuation is determined solely at Bally Bet's discretion. Bets are accepted only at the odds available in the betting grid at the time the bet was accepted by Bally Bet, irrespective of any other claim or previous publication present on the website or any other media detailing otherwise. Any change in odds while placing a wager will result in a notification to the patron within the sports wagering platform.

#### **F. METHODS OF FUNDING A WAGER OR SPORTS GAMING ACCOUNT**

Bally's Interactive currently offers its Patrons the ability to wager on sporting events by accepting funds from Patrons and allowing them to collect their winnings in several ways. Bally's Interactive will accept the following (depending on jurisdiction):

- (1) Play+ Prepaid Card payments to fund a patron's account;
- (2) Fund transfers such as ACH or wire transfers at a U.S. financial institution to finance a patron's account;
- (3) Cash deposits (where services are available);
- (4) Debit Card Payments; and
- (5) PayPal Payments

Pursuant to Massachusetts regulations, credit cards are not accepted as a form of deposit for wagering in Massachusetts. Bally's Interactive currently does not accept virtual currency or checks to fund a patron's account. Note: for PayPal and Play+ transactions, deposits will only be allowed if the original funding method is approved under Massachusetts regulations. Specifically, the funding source for PayPal or Play+ transactions must be cash, debit card, ach transfer, or wire transfer.

Should any of the below be detected, Bally's Interactive will block future use of the methods on a risk-based approach:

- (1) Deposits made by third parties; and
- (2) Business Cards and Accounts

All patron funds received by Bally's Interactive may only be used to place wagers within the Bally's Interactive platforms.

Bally's Interactive offers patrons the ability to withdraw funds from their accounts as follows:

- (1) By sending a funds transfer (ACH or wire) to a patron's account at a U.S. financial institution if such account is maintained in the patron's name
- (2) By issuing checks to patrons in the amount of the withdrawal (checks are mailed to the address Bally's Interactive has on file for the patron)
- (3) By pre-approved cash withdrawals (where services are available)
- (4) By withdrawals back to valid, reloadable debit cards (Visa and Mastercard)
- (5) By sending funds to a player's registered e-wallet account (i.e. PayPal)

Bally's Interactive does not issue bank checks or drafts, cashier's checks, money orders, or traveler's checks in any amount.

#### **G. MINIMUM AND MAXIMUM WAGERS**

The minimum Wager required is 0.01 cents and maximum Wager allowed is \$100,000.00 USD. We may also restrict the amount you may Wager and/or the frequency of your Wagering activity in our sole discretion accordance with these Sports House Rules and our General Terms and Conditions.

#### **H.**

#### **I. METHODS FOR REDEEMING A WINNING SPORTS WAGER**

All winning wagers will automatically be credited to a patron's account upon the confirmation of the outcome of the event.

#### **J. LOST OR DAMAGED TICKET POLICY**

Physical tickets are not offered; all tickets are in electronic format and cannot be lost.

#### **K. EXPIRATION OF ANY WINNING TICKET ONE YEAR AFTER THE DATE THE TICKED OUTCOME IS DETERMINED**

Physical tickets are not offered; all tickets are in electronic format and cannot be lost.

#### **L. PROCESS FOR ACCEPTING SPORTS WAGERS AT OTHER THAN POSTED TERMS**

Bally Bet will not offer wagers at other than posted terms.

#### **M. PROCESS FOR CANCELLING SPORTS WAGERS FOR OBVIOUS ERRORS, INCLUDING NOTIFICATION**

Bally Bet reserves the right, to declare a bet void, totally or partially, if any of the following, or similar, circumstances have occurred:

- (1) Bets have been offered, placed and/or accepted due to an Error and/or at odds which significantly differ from those currently present elsewhere in the betting industry market
- (2) Bets placed while the website was encountering technical problems, that would otherwise not have been accepted;
- (3) Influence Betting;
- (4) Syndicate Betting;
- (5) A result has been affected by criminal actions - directly or indirectly;
- (6) A bet has been offered on the relevant market in breach of the gambling regulation in the specific jurisdiction.

All wagers voided for obvious error will result in a notification from Bally Bet to the patron via email to the email address registered to the patron's account.

#### **N. PROCESS FOR CONTACTING THE SPORTS GAMING PROPRIETOR TO SUBMIT QUESTIONS AND/OR COMPLAINTS**

To file a complaint directly with Bally Bet, players should be instructed to chat or email Customer Service via the below methods:

Email: [support@play.ballybet.com](mailto:support@play.ballybet.com)

Live Chat: Chat via contact us page

Customer Service will make every effort to rectify the situation escalating to appropriate levels as necessary. In the event Customer Service cannot resolve your issue, the concern will be placed on the complaint log for review by Bally Bet's Operations Team.

#### **O. NOTIFICATION OF THE PATRON DISPUTE PROCESS**

Any dispute relating in any way to the use of the Bally Bet Platform should be made via email to [support@play.ballybet.com](mailto:support@play.ballybet.com). Bally Bet's Customer Service team will respond to any complaint or dispute received within a maximum of ten (10) calendar days from the day the complaint is received. Bally Bet will additionally update you via email every ten (10) calendar days of the status for any ongoing dispute that is active.

In the unlikely event the response is not considered satisfactory and the issue is not solved in an adequate fashion for the Patron, the Patron can contact the Massachusetts Gaming Commission directly to file a complaint by accessing <https://massgaming.com/regulations/fairdeal/> and completing the requisite information. Patrons can submit disputes by calling the Commission's Integrity Tip Line at 1 (844) 303-8477 or completing a form (found on <https://massgaming.com/regulations/fairdeal/>) and sending it via email to [MGCcomments@massgaming.gov](mailto:MGCcomments@massgaming.gov), or mailing it to: Massachusetts Gaming Commission, 101 Federal Street, 12th Floor, Boston, MA, ATTN: Sports Division.

#### **P. NOTIFICATION TO PATRONS OF THE VOLUNTARY EXCLUSION PROGRAM**

*Please play responsibly. For help, contact the Massachusetts Problem Gambling Helpline at <https://gamblinghelpline.org/> or by calling 800-327-5050. You can also contact a national problem gambling helpline at 1-800-GAMBLER (1-800-426-2537) or [ncpgambling.org/chat](http://ncpgambling.org/chat).*

An account holder may request to voluntarily exclude access to their account by following the self-exclusion procedure set forth in the Bally's Terms of Use, available [here](#).

For additional information and resources, you can also visit the websites for the [Massachusetts Gaming Commission](#), [Massachusetts Department of Public Health](#), [The MA Problem Gambling Helpline](#), [Massachusetts Council on Gaming and Health](#), [National Council on Problem Gambling](#), or [Gamblers Anonymous](#).

## **II. BALLY BET ADDITIONAL SPORTS WAGERING RULES**

The Bally Bet Additional Sports Wagering Rules ("Additional Sports Wagering Rules") are part of the Bally Bet General Terms and Conditions. The Additional Sports Wagering Rules apply in relation to the markets offered and bets placed on the Bally Bet Platform.

The Additional Sports Wagering Rules consist of the following:

- Conditions of Agreement (Section A);
- General Rules (Section B); and
- Sport Specific Rules (Section C).

The General Rules apply to all bets on the Bally Bet Platform unless stated otherwise in the Sport Specific Rules. If there is any inconsistency between the Sport Specific Rules and the General Rules, the Sport Specific Rules will prevail.

Bally's reserves the right to amend the Additional Sports Wagering Rules at any time. Any such revision will be binding and effective immediately on the posting out to customers of such rule changes and any bets accepted after the rule changes have been posted shall be governed by the new Additional Sports Wagering Rules.

### **A. CONDITIONS OF AGREEMENT**

#### **1. INTRODUCTION**

- (a) When placing a bet with the Bally Bet Sports Book, the Account Holder agrees that they have read, understood, and agree to be bound by the Sports House Rules, the Bally Bet General Terms and Conditions, and the Bally Bet Privacy Policy.
- (b) The use of the Bally Bet Sports Book is subject to the regulations imposed by the Massachusetts Gaming Commission. To the extent that any decision issued by the Massachusetts Gaming Commission conflicts, or is inconsistent, with these Sport House Rules, the decision issued by the Massachusetts Gaming Commission will supersede any relevant clause(s) of these Sport House Rules.
- (c) Bally Bet reserves the right to make changes to the Sports House Rules including, but not limited to, betting limits and offerings.

- (d) Should it be applicable, any reference to the Bally Bet Platform and its contents is also to be considered as applicable for Casino/offline/land-based environments, including Self-Service Terminals (SST), Over The Counter (OTC) and Bring Your Own Device (BYOD).
- (e) Only eligible individuals 21 years of age or older, not prohibited from wagering, and physically located in the Commonwealth of Massachusetts may place a bet on the Bally Bet Sports Book.
- (f) Individuals may not act as an agent or proxy to place a wager on behalf of another. Each Account Holder may only have one account registered to his or her name. An Individual is prohibited from operating the account of another.
- (g) Any reference in these Sports House Rules to words and/or objects that appear in singular also applies to plural. References to gender, if any, are non-binding and to be treated for information purposes only.

## 2. DEFINITIONS

- (a) "Account Holder" means "a user of the Bally Bet Sports Book who successfully registers and holds an account on Bally Bet."
- (b) "Obvious Error" means "a mistake, misprint, misinterpretation, mishearing, misreading, mistranslation, spelling mistake, technical hazard, registration error, transaction error, manifest error, force majeure and/or similar, which may or may not be apparent to Bally's and/or the Account Holder at the relevant time which has caused or resulted in bets being offered and/or accepted."

Examples of Obvious Error(s) include, but are not limited to:

- i. As a result of failure of established risk management controls.
- ii. As a result of inappropriate manipulation of offers or settlement procedures as well as any fraudulent activity.
- iii. Incorrect payouts.
- iv. Cyber attacks.
- v. Bets accepted;
  - i. During technical problems that would otherwise not have been accepted; at odds/prices that have been increased, improved or enhanced from the odds/prices that would have otherwise been offered.
- vi. On events/offers that have already been decided or concluded, or in relation to which Bally's had suspended betting.
- vii. On events/offers after the event/match/offer has started (except for live betting bet types).
- viii. On markets/events containing participants that are not part of the event.

- ix. Otherwise than in accordance with the applicable laws.
- x. At odds that are materially different from those available in the general betting industry at the time the bet was accepted, whereby Bally's will use a majority of betting industry operators, to determine whether odds offered were "materially different".
- xi. At odds which reflect an incorrect score, standing or ranking situation, including where incorrect odds are offered, as a result of any errors or omissions made in respect of the announcing, publishing, or reporting of a score, standing or ranking situation.
- xii. At incorrect odds where it is clear that the actual chances of the event occurring at the time the bet was accepted were materially different, or
- xiii. That the bet has been placed by someone other than the Account Holder (including where someone has gained access to the Account holders' account) or where the Account Holder is victim of fraudulent activity.

(c) "Funds" means "cash and cash equivalent, free wagers, bonuses, and other credits available to be used for wagering purposes."

(d) "Influence Betting" means "an act, prohibited by Bally's, where an Account Holder, or parties acting in association with an Account Holder, can influence, or have influenced, the outcome of a match or an event, directly or indirectly."

(e) "Prohibited Sports Betting Participant" means:

- A person that is under 21 years old;
- Bally's employees, its directors, officers, owners and employees or any relative living in the same household;
- An individual with proprietary or non-public information held by Bally's;
- A professional or athlete, coach, referee, team owner, employee of a sports governing body or its member teams and patron and referee union personnel, seeking to place Wagers on events in the sport in which the individual participates, or in which the athlete the individual represents participates;
- Persons placing Wagers as agents or proxies for others;
- Any individual prohibited from Wagering pursuant to 205 CMR 250.00;
- Any individual who is self-excluded from Wagering pursuant to 205 CMR 233.00;
- Any individual who is prohibited from or subject to limitations regarding Wagering pursuant to 205 CMR 254.00 and 255.00;



- Any individual Wagering while not in the authorized geographic boundaries within the Commonwealth of Massachusetts;
  - Any restricted patron Wagering in violation of their restrictions established in 205 CMR 238.32;
  - Any individual Wagering in violation of state, local or federal law;
  - Other prohibited persons as determined by the Massachusetts Gaming Commission;
- (f) Syndicate Betting" means "an act, prohibited by Bally's, where Account Holders act together to place a bet or series of bets on the same event or competition, or when an Account Holder places a bet on behalf, or for the intended benefit, of another individual or other individuals. Where there is evidence of Account Holders acting together in this manner Bally's reserves the right to make the relevant bets void and/or withhold payment of returns pending the outcome of subsequent investigations to determine whether (in Bally's sole opinion), Syndicate Betting has taken place."

### **3. FUNDING**

- (a) To place a bet, the Account Holder need to deposit funds into their Bally Bet account. Funds deposited via a payment processor may take a few days to clear before they are available for wagering, during which time the funds are held in the account of the relevant payment processor on the Account Holder's behalf.
- (b) To place a bet, Bally's allows the Account Holder to direct their eligible balance available to the Account Holder for wagering in the Commonwealth of Massachusetts, in which the Account Holder holds an account. For more information on deposits and funding please refer to the Bally Bet General Terms and Conditions.
- (c) All funding methods are subject to Bally Bet Anti-Money Laundering (AML) policy, and procedures and will be subject to all federal currency transaction reporting thresholds. Subject to the foregoing, and applicable regulatory restrictions, an Account Holder may make deposits to their account using the following methods:
- i. ACH (electronic checking or direct deposit)
  - ii. Debit cards
  - iii. Direct payment via bank wire transfer
  - iv. Some rewards granted by Bally's to you, including without limitation as part of a promotion or rewards program, may be used to wager on events. These rewards include but are not limited to free wagers, bonuses, and other credits.

In no event can a Massachusetts account be funded through a form of credit.

- (d) Bally's may withhold deposits to confirm the source of the Funds or to comply with state and federal law (for Anti-Money Laundering purposes).

#### **4. BET ACCEPTANCE**

- (a) A bet accepted by Bally's will remain valid and cannot be withdrawn unless such bet was accepted in Obvious Error. It is the Account Holder's responsibility to ensure details of the bets placed are correct. Under no circumstance will Bally's accept any responsibility for any mistakes (perceived or actual), deriving from either Obvious Errors or any other reason.
- (b) A bet is not accepted until it shows in the Account Holder's bet history. Once it does, the contract will be considered duly formed. In cases of uncertainty about whether a bet has been accepted, the Account Holder is requested to check the open (pending) bets or contact Customer Service for confirmation. No bet or wager will be considered as accepted unless confirmed via the Account Holder's bet history or Customer services.
- (c) Should a dispute arise about the acceptance (or lack thereof) of any bet, or the time at which any bet was placed, the Bally's transaction log database will be the ultimate authority in determining such matters.
- (d) Bally's may refuse to accept any bets at any time and for any lawful reason including in order to:
  - i. Preserve the viability of the offered market (for example, without limitation, in relation to events where there is an extraordinary or unbalanced number of bets on the same market).
  - ii. Protect the Account Holder (e.g., without limitation, in relation to the event in which the Account Holder may be subject to fraud and Bally's seeks to protect the player).
  - iii. Protect other users (e.g., without limitation, in connection with the event in which the Account Holder has a betting pattern that could adversely affect the regular betting activity of other users).
  - iv. To protect Bally's (for example, without limitation, in the event that the Account Holder exhibits money laundering, collusive or fraudulent behaviour, we suspect that Account Holder is using a third party's account, is allowing a third party to use the account, or is using automated means, bots, software or similar means, or engaging in arbitrage).
- (e) Bally's, depending on the level of risk, instead of refusing a bet or a wager, may accept the bet request placed by the Account Holder up to a certain amount thereof.

#### **5. BETTING AND PAYOUT LIMITATIONS**

- (a) 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, Bally's 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 by reducing the amount the Account Holder is permitted to place on the wager, prior to wagering.

- (b) Bally's reserves the right, in its sole discretion, to decline, all, or part of, any bet requested. This includes the possibility that a "System Bet" as defined in Section (B)(4) is not accepted in full, either in terms of stakes or combinations included in said "System Bet".
- (c) All bets placed through any Bally's platform, also including bets requesting manual approval, may be subject to a time delay prior to acceptance, the length of which may vary. Such delay is to be determined by Bally's in its sole discretion.
- (d) All odds offered are subject to variation. Such fluctuation is determined solely at Bally Bet's discretion. Bets are accepted only at the odds available in the betting grid at the time the bet was accepted by Bally Bet, irrespective of any other claim or previous publication present on the website or any other media detailing otherwise. Any change in odds while placing a wager will result in a notification to the patron within the sports wagering platform.
- (e) Patrons may choose to display odds on their wagering screen in American or Decimal format. However, all payout calculations for wagers will be calculated based on Decimal odds, irrespective of any other format a patron chooses to display on their account at the time of bet placement. This may result in rounding differences between an expected payout and actual payout. The exact actual payout amount will be shown to the patron at the time of bet placement, which will only be altered in the case of voids, pushes, or allowable deductions (e.g. Dead Heat Rule, tax withholding).

Below is a table that shows the decimal odds that are used for payout calculations by the system, the corresponding US odds (shown on the betslip) and what the exact decimal odds would be based on the US odds (Decimal odds from US).

True Decimal Odds	US Odds	Decimal Odds from US
1.41	-245	1.408
1.48	-210	1.476
1.56	-180	1.556
1.74	-136	1.735
1.91	-110	1.909

For example, if a patron wagers \$100 at decimal odds of 1.91, which will be presented in American odds as -110, the patron will get a payout of \$191 rather than \$190.9.

## 6. CANCELLING (VOIDING OF BETS)

- (a) A bet can be declared void by Bally's. If Bally's declares a bet void, the bet will be settled with the decimal odds of 1.00 or US odds of -100.

- (b) A bet made as a parlay or an accumulative bet shall remain valid with recalculated odds, notwithstanding a match or an event which is part of the accumulative bet being void.
- (c) Bally's reserves the right, to declare a bet void, totally or partially, if any of the following, or similar, circumstances have occurred:
- i. Bets have been offered, placed and/or accepted due to an Obvious Error and/or at odds which significantly differ from those currently present elsewhere in the betting industry market (see Section (A)(2)(a));
  - ii. Bets placed while the website was encountering technical problems, that would otherwise not have been accepted;
  - iii. Influence Betting;
  - iv. Syndicate Betting;
  - v. A result has been affected by criminal actions - directly or indirectly;
  - vi. A public announcement has occurred in relation to the bet which significantly alters the odds;
  - vii. A bet has been offered on the relevant market in breach of the gambling regulation in the specific jurisdiction that the bet was made;
  - viii. A bet or bets which are structured to avoid Anti-Money Laundering requirements.
- (d) Past-posting and other cancellations: While Bally's employs its most reasonable endeavours to ensure the best user-experience, should a market be available for betting when it should have been removed or else with incorrect odds, Bally's reserves the right to void all bets accepted within said circumstances in accordance with Section (A)(6)(c). Similar situations include, but are not limited to:
- (i) 'Pre-match' bets placed/accepted after the event has started;
  - (ii) 'Live' bets placed/accepted at incorrect odds due to delayed or failing 'Live' coverage, or on odds which represented a different score than the actual;
  - (iii) Bets placed following the last instance that a participant/outcome had any chance to influence the match/event scoring applicable to the relevant market and an eventual withdrawal/disqualification/cancellation/format change or anything which precludes the ability of the applicable participant/outcome to influence said scoring will be declared void;
  - (iv) Bets placed with odds which do not reflect that a related event was underway and where conditions could have been altered in a direct and indisputable way, or else after an event which could normally be deemed as leading to the outcome is happening or has happened already.
- (e) Related contingencies: Unless placed via Bally's in-event combination functionality, or offered explicitly as a specific offering, Bally's prohibits accumulator bets that include two or more outcomes which might turn out to be related (e.g. Team X to become champions and Player Y to

be Top Goal Scorer in the same league). Although Bally's takes steps to prevent such possibilities, in the eventuality that this would happen, Bally's reserves the right, to declare void all parts of the accumulative bet which include the correlated outcomes whose odds are not indicative of the related contingency.

(f) Bets can be voided regardless of whether the event has been settled or not.

## **7. PROHIBITED WAGERS AND PROHIBITED PARTICIPANTS**

**(a) PROHIBITED WAGERS:** Any wager involving any of the following criteria is **NOT** approved and is **NOT** permitted:

- a. Any Collegiate Sport or Athletic Event:
  - i. With an outcome dependent on the performance of an individual athlete, including, but not limited, to in-game or in-play wagers involving any collegiate teams from the Commonwealth of Massachusetts, unless the teams are involved in a collegiate tournament;
  - ii. Any horse or greyhound races;
  - iii. Any injuries, penalties, player discipline, or replay review;
  - iv. Any high school or youth sports or athletic events;
  - v. Any fantasy contest unless offered pursuant to M.G.L. c. 12, § 11M½ and 940 CMR 34.00: Daily Fantasy Sports Contest Operators in Massachusetts;
  - vi. Any Sporting Event or Wager Category in which the outcome has already been determined and is publicly known; or
  - vii. Any other sporting event or wagering category that has not been approved by the Massachusetts Gaming Commission in accordance with 205 CMR 247.03.

### **(b) PROHIBITED PERSONS**

- a. A person that is under 21 years old;
- b. Bally's employees, its directors, officers, owners and employees or any relative living in the same household;
- c. An individual with proprietary or non-public information held by Bally's;
- d. A professional or athlete, coach, referee, team owner, employee of a sports governing body or its member teams and patron and referee union personnel, seeking to place Wagers on events in the sport in which the individual participates, or in which the athlete the individual represents participates;
- e. Persons placing Wagers as agents or proxies for others;
- f. Any individual prohibited from Wagering pursuant to 205 CMR 250.00;
- g. Any individual who is self-excluded from Wagering pursuant to 205 CMR 233.00;
- h. Any individual who is prohibited from or subject to limitations regarding Wagering pursuant to 205 CMR 254.00 and 255.00;

- i. Any individual Wagering while not in the authorized geographic boundaries within the Commonwealth of Massachusetts;
- j. Any restricted patron Wagering in violation of their restrictions established in 205 CMR 238.32;
- k. Any individual Wagering in violation of state, local or federal law;
- l. Other prohibited persons as determined by the Massachusetts Gaming Commission;

## **8. DISPUTES**

- (a) If an Account Holder has any concerns or complaints regarding the Bally Bet Platform, the Account Holder may contact the Bally Bet Customer Support Team at [Support@Play.BallyBet.com](mailto:Support@Play.BallyBet.com) or call 1-888-824-0650. All concerns or complaints will receive a response within ten calendar days.
- (b) If an Account Holder has exhausted all reasonable means to resolve the complaint or concern with Bally Bet, then the Account Holder may contact the MGC directly to file a complaint by accessing <https://massgaming.com/regulations/fairdeal/> and completing the requisite information. Patrons can submit disputes by calling the Commission's Integrity Tip Line at 1 (844) 303-8477 or completing a form (found on <https://massgaming.com/regulations/fairdeal/>) and sending it via email to [MGCcomments@massgaming.gov](mailto:MGCcomments@massgaming.gov), or mailing it to:

Massachusetts Gaming Commission  
101 Federal Street, 12th Floor  
Boston, MA  
ATTN: Sports Division

## **9. VOLUNTARY EXCLUSION PROGRAM**

- (a) An Account Holder may request to voluntarily exclude access to their account by following the self-exclusion procedure set forth in Bally's General Terms and Conditions.

## **10. DISCLAIMER AND PRIORITY**

- (a) Bally's reserves the right, to adjust a payout credited to an Account Holder's balance if the payout has been credited to the Account due to an Obvious Error.
- (b) In order to adjust any inaccuracy in the Account Holder's balance following amounts credited due to Obvious Error, Bally's reserves the right, in its sole discretion, to take any necessary action, without prior notice and within reasonable limits, to adjust the Account Holder's balance through the reversal, amendment or cancellation, of any subsequent transaction on the Account Holder's account.

- (c) These rules are applicable to all transactions with the Bally Bet Sports Book and may be supplemented with other Rules. In the event of ambiguity, priority should be considered in the following order:
- i. Rules and conditions published in conjunction with an offer and/or campaign; then
  - ii. The Sport Specific Rules of these Sports House Rules; then
  - iii. The General Betting Rules of these Sports House Rules; then
  - iv. Bally's General Terms and Conditions.
- (d) In cases where Bally's, in its sole discretion, deems that the Rules are inconclusive, Bally's reserves the right, in its sole discretion, to settle affected bets on an individual basis on the basis of equity, attaining itself to generally accepted betting norms, customs and definitions.
- (e) Adaptations into other languages of these House Rules, or any other text which can be associated with bet offers, are done purely for informative purposes. Although precautions have been taken to assure the most accurate rendition of these terms in the specific language, Bally's will not accept any liability for any incompatibility between the English version and any other language. Thus, in case of discrepancy between the English version and the respective translation, the former will be deemed as binding and will be the basis upon which the offers will be settled.
- (f) Any data provided or accessible in, from, or related to the Bally Bet Sports Book, may be used by the Account Holder for private, non-commercial use only and any use or attempted use of such data for commercial purposes is strictly prohibited.
- (g) Bally's has the right to enforce a term of the contract relating to the Bally Bet Sports Book against any Account Holder.
- (h) All promotions, bonuses, or special offers offered to Account Holders based on the services are subject to the express terms of the bonus offered and promotion-specific terms and conditions, and any bonus credited to the Account Holder must be used in adherence with such terms and conditions. By accepting a promotion, bonus, or special offer available on the services, the Account Holder consents to the terms and conditions of such promotion, bonus, or special offer. Bally's reserves the right to withdraw any promotion, bonus, or special offer at any time without prior notice. Bonus funds and any winnings derived therefrom are only converted to cash in accordance with the express terms of the bonus offered and the promotion-specific terms and conditions. Bonus funds that have not been converted to cash may be forfeited under circumstances identified in the terms and conditions of a specific promotion, bonus, or special offer. In instances where a promotion, bonus, or special offer conflicts with these Sports House Rules, the terms of the promotion, bonus, or special offer shall prevail.

## **B. GENERAL RULES**

## 1. COMMON TERMS OF REFERENCE

- (a) Unless listed either in conjunction with the bet offer, or else in the Sport Specific rules, all bets should be considered valid for the result at the end of the "Regular Time" or "Full Time" only. "Regular Time" or "Full time" is defined as interpreted by the official rules published by the respective governing body. For example, in Football, full time is stipulated to be 90 minutes including injury time, and in Ice Hockey it is stipulated as the 3 x 20-minute periods. Should the governing body decide to stipulate, before the start of the event, that the said event is to be played over a different duration, this will be treated as being the official rules for the event (for example, football matches played with 3 x 30 minutes or 2 x 40 minutes formats). Nonetheless, such occurrence is limited to the "regular" playing time and does not include any prolongation such as extra time or overtime, unless explicitly stated.
- (b) "Livebetting" is where it is possible to bet during an ongoing match or event. Bally's does not acknowledge or accept any liability whatsoever if it not possible to place a bet or the live score update is not correct. At all times it is the Account Holder's responsibility to be aware of the match and the events surrounding it such as the current score, its progression and how much time remains before the match is completed. Bally's does not accept any liability for changes to the Livebetting schedule or interruption of the Livebetting service.
- (c) The Cash Out function allows the Account Holder the possibility to redeem a bet, which status has not been settled yet, at its current value. It is available on selected events both in pre-match and live, as well as on both single and multiple bets. Cash Out functionality cannot be used on free bets. Cash Out requests might be subject to the same delay procedure as listed in Section (A)(5)(b). Should it happen that during this delay, for whatever reason, either the offer is removed, or odds fluctuate, the Cash Out request will not be accepted, and the Account Holder will be notified with an on-screen message. Bally's reserves the right to offer such functionality at its own discretion and does not acknowledge or accept any liability whatsoever should the functionality not be available. Should a Cash Out request be successful, the bet will be settled immediately and any subsequent events which occur in relation with the bet will not be considered. In the instance of a Cash Out bet having suffered from a technical, pricing or settlement error at any time between the time of original offering and the final settlement, Bally's reserves the right to rectify such inaccuracy in accordance with Section (A)(9)(b).
- (d) The "Participant" is an object constituting part of an event. In "Head-to-Head" and "Triple-Head" the Participant only refers to objects that are subject to the "Head-to-Head" or "Triple-Head" event in question. For sake of clarity a "participant" is to be intended as a single player, a team or any group of individuals grouped/listed together. Any reference to participants within these rules is to be intended accordingly regardless of whether its definition is in singular or plural.



- (e) The “match” or “game” start time shown on the Bally Bet Platform is to be treated for information purposes only. Game times may not accurately reflect the actual starting time of the game or match and is subject to change. A wager accepted after the game or match start time shown on the Bally Bet Platform does not constitute an in-play wager or a wager accepted after the game has started. Bally’s reserves the right, to suspend, partially or completely, the betting activity at any time where it deems necessary.
- (f) Statistics or editorial text published on the Bally’s website(s) are to be considered as added information. Bally’s does not acknowledge or accept any liability if the information is not correct. At all times it is the Account Holder’s responsibility to be aware about circumstances relating to an event.
- (g) Theoretical return in fixed odds betting to the player is given by the odds from all possible outcomes in the offer. The theoretical payback to a player on a bet offer with 3 outcomes a, b and c can be calculated as follows.  
Theoretical % =  $1 / (1 / \text{“odds outcome a”} + 1 / \text{“odds outcome b”} + 1 / \text{“odds outcome c”}) \times 100$

## 2. BET TYPES

- (a) "Match" (aka 1X2) is where it is possible to bet on the (partial or definite) outcome of a match or event. The options are: "1" = Home team/Player 1, or the participant listed to the left side of the offer; "X" = Draw/Tie, or the selection in the middle; "2" = Away team/Player 2, or the participant listed to the right side of the offer. In particular instances or specific competitions, Bally Bet might display an offer in the so-called “American” format (ie: Away Team @ Home Team), where the host team is listed following the visiting team. Irrespective of the positioning of the teams on the board/betslip, the references to “Home” and “Away” teams will always refer to the actual teams playing at home (host) and away (visitor) respectively, as determined by the official organization bar the exceptions as detailed in individual sport rules.
- (b) "Correct Score" (aka Result Betting) is where it is possible to bet on the (partial or definite) exact score of a match/event, or part of it.
- (c) "Over/Under" (aka Totals) is where it is possible to bet on the (partial or definite) amount of a predefined occurrence (e.g. goals, points, corners, rebounds, penalty minutes, etc.). Should the total amount of the listed occurrences be exactly equal to the betting line, then all bets on this offer will be declared void. Example: an offer where the betting line is 128.0 points and the match ends with the result 64-64 will be declared void.
- (d) "Odd/Even" is where it is possible to bet on the (partial or definite) amount of a predefined occurrence (e.g. goals, points, corners, rebounds, penalty minutes, etc.). "Odd" is 1, 3, 5 etc.; "Even" is 0, 2, 4 etc.
- (e) A "Head-to-Head" and/or "Triple-Head" is a competition between two or three participants/outcomes, originating from either an officially organized event, or else, as virtually defined by Bally Bet.

- (f) "Half time/Full time" is where it is possible to bet on the result in Half time and the outcome at the end of the listed timeframe. E.g. if at Half time the home team is leading 1-0 and the match ends 1-1, the winning outcome is 1/X. Bets on this market will be declared void should the match be played in a format where it is impossible to determine an outcome based on the timeframes listed within the offer. If the sport is unable to conclude in the time rules according to each sport, a Half time/Full time wager will be voided.
- (g) "Period betting" is where it is possible to bet on the outcome of each separate period within a match/event. E.g. If the period scores in an ice hockey match are 2-0 / 0-1 / 1-1, the winning outcome is 1/2/X. Bets on this market will be declared void should the match be played in a format where it is impossible to determine an outcome based on the timeframes listed within the offer.
- (h) "Draw No Bet" (aka Moneyline) is where it is possible to bet on either "1" or "2". It is also common practice to refer to "Draw No Bet" in cases where no draw odds are offered. Bets will be voided should the specific match/event not produce any winning outcome (E.g. match ends as a draw), or the occurrence not happen (E.g. First Goal, Draw No Bet and match ends 0-0).
- (i) "Handicap" (aka Spread) is where it is possible to bet on whether the chosen outcome will be victorious once the listed handicap is added/subtracted (as applicable) to the match/period/total score to which the bet refers to. In those circumstances where the result after the adjustment of the handicap line is exactly equal to the betting line, then all bets on this offer will be declared void. Example: a bet on -3.0 goals will be declared void if the chosen team wins the match by exactly 3 goals difference (3-0,4-1, 5-2, etc). Any reference in this section to the term "margin" is intended to be understood as the outcome emerging from the subtraction of the goals/points scored by the 2 teams/participants.

Unless otherwise stated, all handicaps listed on the Bally Bet Platform are to be calculated based on the result from the start of the listed match/period to the end of the specified match/period. It is however customary that for certain handicap bet offers in specific sports (Asian Handicap in Football), only the outcomes obtained from the time of bet placement until the end of the listed timeframe will be taken into consideration, thus disregarding any goals/points scored before the time the bet was placed and accepted. Any bet offer with these characteristics will be clearly displayed on site and highlighted in the bettors' Bet History with the score at the time of bet placement.

There are 3 different "handicap betting" formats:

(1) 2-way Handicap: Team A (-1.5) vs Team B (+1.5)

Example:

- Team A is given a -1.5 goal handicap in the match. For the bet to be won, Team A must

win the match with a margin equal or bigger than the listed handicap (ie. 2 goals or more).

- Team B is given a +1.5 goal advantage in the match. For the bet to be won, Team B must either win the match, match finish in a draw or not lose with a margin equal or bigger than their listed advantage (ie. lose with a 1 goal margin).

## (2) 3-way Handicap: Team A (-2) Draw (Exactly 2) Team B (+2)

Example:

- Team A is given a 2 goal handicap in the match. For the bet to be won, Team A must win the match with a bigger margin than the listed handicap (ie. 3 goals or more).
- Draw would be the victorious outcome should the match end up with exactly the listed margin (ie. match ends with results such as 2-0, 3-1 and 4-2).
- Team B is given a 2 goal advantage in the match. For the bet to be won, Team B must either win the match, match finish in a draw or not lose with a margin equal or bigger than their listed advantage (ie. lose with only a 1 goal margin).

## (3) Asian Handicap: Team A (-1.75) vs Team B (+1.75)

Example:

- Team A is given a -1.75 goal handicap in the match. This means that the stake is divided into 2 equal bets and placed on the outcomes -1.5 and -2.0. For the bet to be fully paid out at the listed odds, Team A must win the match with a bigger margin than both of their listed handicaps (ie. 3 goals or more margin). In the eventuality that Team A wins with only a 2 goal margin, the bet will be considered as partially won with a full payout on the -1.5 part of the bet and a refund on the -2.0 side since the outcome on that part of the bet would be considered a "tie". Should the match produce any other outcome, including a Team A victory with only 1 goal of margin, the whole stake would be lost.
- Team B is given a +1.75 goal advantage in the match. This means that the stake is divided into 2 equal bets and placed on the outcomes +1.5 and +2.0. For the bet to be fully paid out at the listed odds, Team B must either win the match, match finish in a draw or not lose with a margin equal or bigger than any of their listed advantages (ie. lose with only a 1 goal margin). In the eventuality that Team B loses with exactly a 2 goal margin, the bet will be considered as partially lost with a refund on the -2.0 part of the bet and a loss on the -1.5

part of the bet. Should the match produce any other outcome which results in a defeat of Team B with a margin of 3 or more goals, the whole stake would be lost.

- (j) "Double Chance" is where it is possible to bet simultaneously on two (partial or definite) outcomes of a match or event. The options are: 1X, 12 and X2 with "1", "X" and "2".
- (k) "Outright" or "Place" betting is where it is possible to choose from a list of alternatives and bet on the eventuality that a participant wins or places within a specified position in the classification of the listed event/competition. Should two or more participants share finishing positions, the settlement will be based on the Dead Heat Rule.
- (l) An "Each Way" bet (aka EW) refers to a bet where the chosen selection must either Win or else Place within the payout terms. The bet is divided in two parts (the "Win" part and the "Place" part) of an equal stake. Settlement of such bets will take into account the applicable rules governing the "Win" and "Place" bets, namely the Sport-specific rules.
- (m) "Goal minutes" is where it is possible to bet on the sum of the minutes when the goals have been scored. When settling such bets, goals scored in injury time of both halves are to be considered as having been scored in the 45th minute in case the goal was scored in the first half injury time and the 90th minute in case the goal was scored in the second half injury time. Own goals will not count towards the settlement of individual player's 'goal minutes'.
- (n) "Player Propositions" or "Props" refers to a bet on a verifiable statistical result of an individual player or group of players within a wagering event. Examples include: Over or Under 1.5 touchdown passes for a Quarterback, Over or Under 55.5 Rebounds + Points + Assists for a Point Guard, First touchdown scorer in an NFL game, anytime goal scorer in a soccer match.

### **3. BETTING PROPS**

- (a) Fantasy/Virtual "Matches" or "Head to Heads" are implicit match-ups where the performances of two or more participants/teams which are not directly confronting each other in the same match/event/round are compared. Settlement will be based on the number of times each participant records a predefined occurrence (e.g. goals) in the respective match. The following criteria will be used to determine the settlement of these type of offerings:
  - i. Unless specifically stated the bets refer to the next official match/event/round (as applicable) that the listed participants/teams are scheduled to take part in.
  - ii. All relative matches/events must be completed on the same day/session which the match/event/round is scheduled to be completed for bets to stand, except for those offers the outcomes of which has been decided prior to the abandonment and could not possibly be changed regardless of future events, which will be settled according to the decided outcome.

- iii. Results for these offers will only take into account occurrences deriving from the actual play. Results attributable to walk-overs as well as other decisions as specified in clauses (b), (c) and (d) of Section (B)(5) will not be taken into consideration.
- iv. Should the aforementioned criteria be inconclusive in determining the outcome for these offers, the following criteria will be progressively referenced to in order to settle the offering:
  - (i) the applicable Sport-specific rules as listed in Section (C);
  - (ii) Result Settlement rules as listed in Section (B)(5).

Bets will be settled as void should it still be impossible to determine a winning outcome.

- (b) "Grand Salami" is where it is possible to bet on the total number of listed occurrences (Example: Total Goals, Total Runs) happening in a collection of matches/events on a specified round/day/match day. All relative matches/events must be completed for bets to stand except for those the outcomes of which have been decided prior to the abandonment and could not possibly be changed regardless of future events, which will be settled according to the decided outcome.
- (c) Over/Under bets on classification of participants in performances/events must be interpreted as follows: "Over" means a worse or lower position while "Under" means a better or higher position. Example: A bet on a player's classification in a tournament with an Over/Under line 2.5 will be settled as Under if the player classifies first or second. All other placements will be settled as Over.
- (d) Bets on "Quarter / Half / Period X" refer to the result/score achieved in the relevant timeframe and does not include any other points/goals/events tallied from other parts of the event/match. Bets on this market will be declared void should the match be played in a format where it is impossible to determine an outcome for the timeframes specified in the offer.
- (e) Bets on "Result at end of Quarter / Half / Period X" refer to the result of the match/event after termination of the stipulated timeframe and will take into account all other points/goals/events tallied from previous parts of the event/match. Bets on this market will be declared void should the match be played in a format where it is impossible to determine an outcome for the timeframes specified in the offer.
- (f) Bets on "Race to X Points / Race to X Goals..." and similar offers refer to the team/participant that is the first to reach the specified tally of points/goals/events. If the offer lists a timeframe (or any other period restriction), it will not include any other points/goals/events tallied from other parts of the event/match which are not related to the mentioned timeframe. Should the listed score not be reached within the stipulated timeframe (if any), all bets will be declared void, unless odds for such eventuality have been published within the market.

- (g) Bets on "Winner of Point X / Next to Score " and similar offers refer to the team/participant scoring/winning the listed occurrence. For the settlement of these offers, no reference to events happening prior to the listed occurrence will be taken into consideration. Should the listed occurrence not be scored/won within the stipulated timeframe (if any), all bets will be declared void, unless odds for such eventuality have been published within the market.
- (h) "To score first and win" refer to the listed team/participant being the first to register any scoring in the match and going on to win the match. Should there be no scoring in the match all bets will be settled as void.
- (i) Any reference to "Clean sheet"/"Shutout" indicates that the listed team/participant must not concede any goal/points during the match/relevant timeframe.
- (j) " To win from behind" refers to the listed team/participant winning the match after having been at least 1 goal/point behind their opponents at any point in the match/relevant timeframe.
- (k) Any reference for a team/participant to win all halves/periods (e.g. Team to win both halves) means that the listed team must score more goals/points than its opponent during all the stipulated halves/periods of the match.
- (l) Any reference to "Injury Time" refers to the amount displayed by the designated official and not to the actual amount played.
- (m) Settlement of bets on offers such as "Man of the Match", "Most Valuable Player" etc. will be based on the competition's organisers' decision, unless otherwise stated.
- (n) Settlement of bets which make reference to terms such as "decisive goal" will be settled based on the scorer of the goal that at the end of the match/tie (as applicable) proves to be the one that has produced an unassailable lead, following which any further goals would prove to be irrelevant towards the final outcome. For a bet to be settled as "YES" the listed player's team must be declared winner of that particular match (in case of one match) or progressing to the next round/winning the competition. Goals scored in Regular Time and Extra Time count but not Penalty Shoot outs.
- (o) Bets on events which feature a selection of episodes that could happen in a match (E.g. "What will happen first to the player? with options "Score a goal, Be Substituted) will be settled as void should none of the listed events/outcomes occur, unless odds for such eventuality have been published within the market.

(p) Settlement of Transfer bets will also take into account players signed by the club on loan deals.

(q) Offers referring to which team/participant will achieve a particular accomplishment against another team/participant (E.g. Next team to beat Team X) as well as offers which refer to the classification on a certain date, will stand and be settled regardless of any eventual fixture changes and number of games/rounds played.

(r) Settlement of offers referring to which team/participant will be the first to achieve a particular accomplishment against other team(s)/participant(s) (E.g. Team to score first in Matchday X) will be based upon the timeframe in the respective match in which the feat has been accomplished. Example: Team A plays on Saturday and score their first goal in the 43rd minute while Team B plays on Sunday and score their first goal after 5 minutes, then Team B will be settled as winner.

(s) From time to time Bally's, at its sole discretion and without prejudice to related contingencies as described in Section (A)(6)(d), might decide to publish offerings referring either to the single performance of a participant/team or offerings which combine the potential outcomes of 2 or more teams/participants (example: Enhanced Multiples, Boosted Odds, etc), at higher odds than those normally available. Bally's reserves the right to withdraw such offers, edit the respective odds and effect any further changes Bally's might deem necessary at its sole discretion. Settlement of these offers will be based on the following criteria in the listed order:

- i. Unless specifically stated the offer refers only to the listed day(s) and/or next official match/event/round (as applicable) that the listed participants/teams are scheduled to take part in at the time the offer is published.
- ii. Results settled as per respective Sport-specific rules. All related events must be completed as scheduled within the applicable timeframes for bets to stand unless any other outcome in the offer would incontrovertibly determine the outcome of the offer in a way that completion (or lack of thereof) of the other events listed in the offer would not influence the outcome of the offer. Such markets will be settled according to the already determined outcomes.
- iii. Unless explicitly stated within the offer, result settlement will only take into account occurrences deriving from the actual play. Results attributable to walk-overs, protests, changes to the first official result, etc will not be taken into consideration. Bets will be voided should it be impossible to determine a winning outcome in accordance with the respective Sport-specific rules.
- iv. All connotations related to the offer must be fully and unquestionably complied with, for the bet to be deemed as winning, regardless of any possible conflict with the Sport-Specific rules, or with any potential interpretation based on previous or current presentation of offers related to events in that particular sport and the way these are

normally presented in the Bally Bet Sports Book. Where applicable, should the offer include any outcome the result of which ties exactly the chosen Over/Under or Spread line (aka PUSH) this will not be considered as having accomplished the listed occurrence and will result in the bet being settled as LOST.

While precautions have been taken by Bally's to ensure a superior user experience, it is to be understood that markets might fluctuate in such a way that, at any given point in time, these markets do not represent an enhanced value comparable to related bet offers currently present on the Bally Bet Sports Book. All bets remain valid regardless of these eventual fluctuations.

- (t) During selected events, Bally's will provide users with functionality to place bets combining outcomes and occurrences from the same event (aka Intra-Event Combinations), either through pre-established combinations present in the Bally Bet Platform(excluding Enhanced Multiples, Boosted Odds, etc for which Section (B)(3)(u) applies), or through the BetBuilder functionality. Such functionality is only present at Bally's sole discretion and without prejudice to related contingencies as described in Section (A)(6)(d). Settlement will be based on the respective Sport-specific rules. All related occurrences must be fully accomplished for a bet to be considered as having happened and eventually paid out at the odds struck. Stakes refunded should any part of the combination be settled as VOID. Where applicable, should the combination feature any outcome the result of which ties exactly the chosen Over/Under or Spread line (aka PUSH), such part of the combination will be removed from settlement calculation and bets will be paid out taking into consideration only the other parts of the combination.
- (u) "Teaser+" allows the user the possibility to allocate the same pre-set amount of points to all outcomes present in a parlay (combination) containing Spreads (Handicaps), Totals (Over/Unders) or a combination of both. Example: User combines NFL Team X +6.5 points in a parlay with Over 41 points in the NFL match between Team Y and Team Z. By choosing the "Teaser+ Football 6 points" option, the lines and odds get recalculated into a parlay featuring Team X +12.5 points (previously +6.5), combined with Over 35 points (previously Over 41). Should any part of a "Teaser+" bet be settled as void (push), that particular selection will be excluded from the parlay and the computation of odds/payout will be re-adjusted accordingly.
- (v) Bets referring to "Rest of the match" or similar will consider only outcomes and occurrences obtained from the time of bet placement until the end of the listed timeframe, thus disregarding any occurrences registered before the time the bet was placed and accepted.
- (w) Bets on specific timeframes/intervals (example: Match result between 60:00-89:59), will consider only outcomes and occurrences accumulated during the specified timeframe/interval. Settlement will not take into account any other points/goals/events tallied from other parts of



the event/match outside the specified timeframe/interval, including stoppage/injury time, unless specified.

#### **4. SYSTEM BETS**

- (a) In Pre-match and Live betting, it is possible to combine up to twelve (12) different offers on a single coupon. Based on these twelve offers, Account Holders can choose their own number of singles, doubles, trebles etc.
- (b) Bally's reserves the right to limit the amount of combinations due to what is known as outcome dependency/related contingencies, as defined in Section (A)(6)(d).
- (c) It is possible to include one or several matches as 'bankers' which means that the selected matches/events will be included in all coupons.
- (d) A 'Trixie' is a combination, which includes one treble and three doubles from a selection of three matches.
- (e) A 'Patent' is a combination, which includes one treble, three doubles and three singles from a selection of three matches.
- (f) A 'Yankee' is a combination, which includes one fourfold, four trebles and six doubles from a selection of four matches.
- (g) A 'Canadian' (also known as 'Super Yankee') is a combination, which includes one fivefold, five fourfolds, ten trebles and ten doubles from a selection of five matches.
- (h) A 'Heinz' is a combination, which includes one sixfold, six fivefolds, fifteen fourfolds, twenty trebles and fifteen doubles from a selection of six matches.
- (i) A 'Super Heinz' is a combination, which includes one sevenfold, seven sixfolds, twenty-one fivefolds, thirty-five fourfolds, thirty-five trebles and twenty-one doubles from a selection of seven matches.
- (j) A 'Goliath' is a combination, which includes one eightfold, eight sevenfolds, twenty-eight sixfolds, fifty-six fivefolds, seventy fourfolds, fifty-six trebles and twenty-eight doubles from a selection of eight matches.

For display purposes, when necessary, the second digit after the decimal point of the odds is shown as rounded up in the Account Holder's bet history to the nearest decimal number. The payout will however be made based on the actual odds multiplied by the stake, disregarding the aforementioned rounding.

## 5. RESULT SETTLEMENT

- (a) When settling results Bally's will do its utmost to attain itself to information obtained first-hand (during or exactly after the event has been concluded), through TV transmissions, streaming (web-based and through other sources) as well as official sites. Should this information be omitted from first-hand viewing and/or official sources and/or there is an obvious mistake in the information included in the sources above, the settlement of the bet offer will be based on other public sources. Nevertheless, unless a clear and verifiable Obvious Error is noted in the first official result, settlement of bets will not include any changes deriving from and/or attributable to, but not limited to: disqualifications, penalisations, protests, sub-judice results and/or successive changes to the official result after the event has been completed and a result has been announced, even preliminarily.
- (b) Settlement of markets held over for more than 1 round/stage (e.g., Season Bets), will only consider amendments affecting bets for which settlement has not yet been decided. Such measures must be announced by the governing body before the last scheduled round/stage will be considered. Any changes effected after this date, or else referring to bets which have already been settled based on events happening during the event/competition will not be considered.
- (c) Unless otherwise specified within the offer, implied by the official competition rules or announced beforehand as being the official format for that particular event, any changes from the default sport/event/competition format that result in Bally's offering odds/lines/totals which are incongruent with the revised playing format, will result in the voiding of the bets affected by the format change.
- (d) Offers where the format change does not preclude the governing body from declaring a winner (ex. Season winner), irrespective whether there will be a continuation of play or not, revised length of season/competition etc., will be settled according to the result issued by the governing body granted that said result is issued as per the timeframes listed below and is congruent to the odds/lines/totals available at time of offer publishing. The following settlement provisions apply in such cases:
  - (i) Should the governing body declare a relevant outcome within 3 months from the last match played before the interruption (be it final classification, cancellation or intentions to resume play), markets will be determined accordingly.
  - (ii) In case no applicable official communication/result is issued within 3 months from the last match played before the interruption, markets will be settled in accordance with the last classification/rankings available,

regardless of number of matches played/current stage/phase of the competition.

- (iii) Markets which refer to whether a team/participant will reach a subsequent phase of the competition (example: Play-Offs) will be settled as void should there be any changes to the format/number of participants scheduled to contest that particular phase or that particular phase is not played at all, unless an outcome based on the market connotations at time of bet publishing has already been determined and the change in number of applicable matches bears no influence the outcome of the offer.
  - (iv) Markets which odds are dependent/based on a full schedule of matches being played (example: Over/Under Wins in the Regular Season/Points in the League), will be declared void should the number of matches played end up being different than originally scheduled at the time of bet publishing, unless an outcome has already been determined and the change in number of applicable matches bears no influence the outcome of the offer.
- (e) Occurrences which have not been sanctioned and/or acknowledged by the match/event officials (e.g. disallowed goals) will not be taken into account towards the settlement of the bet. As a general rule, and unless the offer specifies otherwise, Bally's will settle offers based on the exact time that the flow of play was interrupted/resumed (as applicable) by the occurrence in question (e.g. ball went out of play for a throw-in/goal kick or crosses the line for a goal), or play is interrupted by the referee, whichever is earliest. Occurrences are only considered awarded, if the subsequent related action is performed i.e. (Offside must result in a free kick, corners must be taken, and Goal kicks must be taken). Should the occurrence be only awarded and not taken, it will not be considered for settlement purposes.
- (f) All bet offers related to matches/events which do not take place at all or are awarded a result through a walk-over decision, will be declared void.
- (g) In case of an abandoned event, all bet offers that have been decided prior to the abandonment and could not possibly be changed regardless of future events, will be settled according to the decided outcome. Should the abandoned event not resume within 12 hours of its start time, all pending offers related to the event will be settled as void.
- (h) In case an event is abandoned and is scheduled to restart from the beginning, all bets placed before the initial match which could not be settled through the outcomes deriving from the play prior to abandonment, will be declared void regardless of whether or when the match is continued.

(i) Unless otherwise stated either in the Sport-Specific rules or in conjunction with the bet offer, specific events forming part of tournaments/competitions which are not held, get postponed and/or rescheduled for a time/date longer than 12 hours from the last scheduled time issued by the governing body due to bad weather, crowd trouble or similar scenarios will be declared void with the following exceptions where bets will remain valid:

- Events which starting times have not been officially confirmed yet by the governing body at time of bet placement.
- Events which are moved due to scheduling conflicts/tv broadcasts but remain scheduled to be played within the same matchday/game week/round (as applicable) and the change does not change the order of official fixtures for any of the participants in the offer.
- Events which start times are anticipated (brought forward) but remain scheduled to be played within the same matchday/game week/round (as applicable) and, without prejudice to past-posting and similar occurrences as defined in Section (A)(6)(d), the change does not modify the order of official fixtures for any of the participants in the offer.

For the avoidance of doubt the definition of same matchday/game week/round is to be interpreted as the order of fixtures as dictated by the governing body with each specific match representing a matchday/game week/round. Should this order not be upheld and the sequence of fixtures changes in a way that matches against other teams get scheduled in between so much that the listed fixture ceases to be the next official commitment from that particular tournament/league/competition for all teams involved, that will be considered as not part of the same matchday/game week/round and offers will be declared void. The above does not apply to Season bets which will remain valid granted that the tournament/league/competition is held and decided during the season/year it refers to, regardless of any eventual date changes. In cases of Play-offs series or other series of matches which are scheduled to confront 2 teams over 2 or more matches, any re-scheduling of a single match will be considered as being part of the same matchday regardless of the length of the re-scheduling, granted that the order of home and away fixtures in the series is not modified and the listed fixture takes place within the series. Bets will be declared void otherwise.

(j) In cases of events which have not been completed before their natural conclusion, and a result is issued through a decision by the association not more than 12 hours from the event's start, Bally's will use the issued decision as the official result for offers related to the event's outcome, such as Match, Draw No Bet and Double Chance granted that the issued decision does not change the outcome of the said bet offers at the time of the abandonment. In that case the stakes will be refunded. All offers referring to the tallying of particular occurrences

(example: Total Goals, Handicaps, etc) will be declared void except for those the outcomes of which have been decided prior to the abandonment and could not possibly be changed regardless of future events, which will be settled according to the decided outcome.

- (k) All bet offers related to uncompleted matches/events where the official governing body is not previously acknowledged (e.g. Club Friendlies) will be declared as void unless at least 90% of the stipulated Regular/Full time is played, see in Section (B)(1)(a). Should the match/event be abandoned after 90% has been completed, the settlement will be based on the current score at the time when the match/event was stopped.
- (l) Unless stated alongside the wagering market, settlement of bet offers, such as, but not limited to, shots, shots on target, ball possession, assists, rebounds, etc. will be based according to the definition with which the official governing body issues said statistics. Unless backed by uncontradictory evidence, Bally's will not acknowledge any complaints which derive from a personal interpretation of such terms.
- (m) With the exception of Trotting and Horse Racing, wagers placed on participants/teams who take no part in an event, will be declared void.  
However applicable qualifying stages or similar, are to be considered part of the main event, and any participation within, is considered as validating the wager and will not be voided. Bally's reserves the right, to apply Tattersalls Rule 4, as explained in Section (B)(6), on any competition and this will be stated in correlation to the bet offer and/or the relevant Sport-specific rule.
- (n) No refunds of bets will apply, even if the winning outcome of a match/event is a participant/outcome that has not been listed for betting purposes. On all bet offers, the Account Holder has the possibility to ask for a price on a non-listed participant/outcome. Bally's reserves the right, to accept or decline such requests.
- (o) In case a participant is disqualified/withheld/banned from taking part in a subsequent part/phase of an event/competition, the disqualification will be considered to have taken place at the time of the participant's removal from the event. No alterations will be made to previous results, regardless of any modifications due to said actions. Bets placed after the disqualified participant last took part in the event will be declared void.
- (p) If two or more Participants share the applicable finishing positions and no odds have been offered for a drawn outcome, the payout will be calculated by dividing the odds by the number of participants sharing those certain positions and are settled accordingly. The payout will always be at least equal to the stake, except in cases of "Head to Heads", see Section (B)(2)(e) and Section (B)(5)(s).

- (q) In "Group Betting" (aka "Best of X"), all listed participants must start the event for bets to stand.
- (r) In "Group Betting" (aka "Best of X"), at least one participant from the selection list must successfully complete the event for bets to stand. Should that not be the case, and the governing body does not follow specific tie-breaking criteria, the bets will be declared void.
- (s) In a "Head to Head" between two or three participants, all listed participants must start the particular round/event which the bet refers to, for bets to be considered valid.
- (t) In a "Head to Head" between two participants, all bets will be refunded if both participants share the same position/score or are eliminated at the same stage of the competition, unless the governing body follows specific tie-breaking procedures, in which case, these will be deemed valid.
- (u) In a "Head to Head" between three participants and more than one winning outcome, the odds will be divided by the outcomes sharing the winning position, irrespective whether the net outcome is lower than the Account Holder's stake.
- (v) If a "Head to Head" is offered between different rounds/stages, all participants must take part in the upcoming round/stage for bets to be valid. Should any participant listed in the offer not take any subsequent part, bets placed from after the last time the participant was active in the event will be declared void.
- (w) Unless specifically stated, whenever the organising association deems it fit to include any necessary rounds, matches, or series of matches (e.g. Play-offs, Play-outs, Postseason) following the end of the so-called Regular Season in order to determine the classification, league winners, promotion/relegation, etc., Bally's will take into account the results and outcomes deriving from these matches for settlement purposes of bets referring to the final league classification, promotion, relegation, etc. For example, seasonal bets on the team winning the NHL will refer to the Stanley Cup Winners.
- (x) Offers which confront against each other the performances of two or more individuals/teams over a stipulated timeframe/competition will only be settled based on the result of the listed participants, disregarding all other participants in the same competition/event.
- (y) Unless specifically stated, all offers referring to a single player's performance in a specific domestic league (such as Total Goals Scored by Player X in League Y) or "Head to Head" bet offers involving two players' performances in domestic leagues, will not take into account those events happening during eventual Play-offs/Play-outs/Post-season or any other matches, or series of, which would happen after the so-called Regular Season.

- (z) Offers related to a total amount of occurrences/events scored/tallied by a particular team, either in a single team performance in a specific domestic league (such as Total Goals Scored by Team X), or "Head to Head" bet offers involving two teams' performances in domestic leagues (E.g. Most Goals Scored in League X - Team Y vs Team Z), or a cumulative league performance (E.g. Team to score most Goals in League X) will not take into account those events happening during eventual Play-offs/Play-outs/Post-season or any other matches, or series of, which would happen after the so-called Regular Season, unless otherwise specified.
- (aa) In a single player performance bet offer in a specific domestic league (such as Total Goals Scored by Player X in League Y) or "Head to Head" bet offers involving two players' performances in domestic leagues, unless an outcome has already been achieved, bets will be voided should any of the following occurrences happen to any relevant participant: (i) is not part of the matchday squad for the club/team they are eligible for at time of bet placement in 50% or more of the remaining applicable matches for any reason, (ii) does not take part in at least another match after the bet has been placed, (iii) totals the same amount as the other player, unless a draw/tie option has been offered. Other sports-specific conditions may apply, please refer to the Sport-specific section.
- (bb) In a single player performance bet offer in a specific event (such as Total Goals Scored by Player X in International Tournament) or "Head to Head" bet offers involving two players' performances in specific events, should any of the following occurrences happen to either of the participants in the selection list, the bets will be considered void: (i) does not take part at all in the event (ii) does not take part in at least another match after the bet has been placed, (iii) totals the same amount as the other participant, unless a draw/tie option has been offered.
- (cc) During specific events Bally's might decide to offer for betting a reduced selection of participants and might also include betting options such as "any other", "the field", or similar. This option includes all unlisted participants except for the ones mentioned specifically as available.
- (dd) Offers that make specific reference to a participant's/participants' performance in a particular event (e.g. Player X vs The Field) are to be considered void if the mentioned participant(s) do(es) not take part in the competition.
- (ee) Any form of a qualification ahead of the main event is considered to be a valid part of that competition. Thus any participant who is eliminated at qualification stage will be considered losing to anyone that is pre-qualified or is successful in the qualification part.
- (ff) Bet offers which originally require participant(s) to compete in two or more stages/legs to advance into a subsequent phase/round of a competition, will remain valid regardless of any postponement/movement of the actual match dates, given that said match(es) actually takes place within the frame of the competition.

(gg) A bet on a "To Qualify" market originally requiring just one stage/leg to advance to a subsequent phase/round of a competition (including any eventual prolongations/additional matches, e.g. replays) will be declared void if said match is not decided within more than 12 hours of its supposed start time.

(hh) Should an event be moved from its originally announced venue and/or have its playing surface changed, this will not be treated as a cause for offers to be voided unless (i) the Sport-specific rules dictate such, and/or the new location in which the event takes place is the habitual "home" pitch of either participant involved in the match. As a general principle, Bally's will refer to the Home team (host) and the Away team (visitor) in accordance with the definition issued by the governing body for that particular match/competition. Bets on matches played on so-called "Neutral pitches" will remain valid, regardless of whether such information has been detailed in the bet offer and/or the positioning of the teams on the betting board/display. In cases where there is a discrepancy between the positioning of the teams/participants on the official website and their placement on the betting board/display, and such discrepancy causes a significant effect on the odds of the match/competition Bally's will void the affected bets. Such eventuality is contemplated only in cases where the discrepancy has a material and visible effect on the odds. For example, in cases of swapped Home and Away teams in an Ice Hockey match Bally's will void the bets. Nevertheless Bally's will consider valid bets placed on events where the so-called home-field advantage is not considered and in cases of neutral venues. Examples of such cases include but are not limited to tennis tournaments, MMA fights, singles competitions in general, or specific events such as the final/late stages of team competitions being held in pre-established venues, like the Superbowl, the NCAA Final 4 or the Italian Football Cup Final even if the location can be deemed as a potential customary "home" pitch for either of the teams involved. In such cases, said events will be considered as being played in neutral venues and all bets stand, regardless of the positioning of the teams/participants on the official website and their placement on the betting board/display.

(ii) Information referring to gender of the teams, age groups and youth teams, as well as various definitions of reserve teams (e.g. B and C teams), is to be treated as supplementary information. The inclusion (or lack of) and correctness of such information will not be treated as sufficient cause for the voiding of the offers related to the match/event, given that this does not cause an obvious inconsistency in odds offered.

(jj) While precautions are taken by Bally's to assure the most accurate rendition of all components involved in a bet offer, it is to be assumed that certain denominations could be represented differently due to different interpretations deriving from adaptations into another language. Such linguistic incongruence will not be treated as sufficient cause for the voiding of the offers



related to the match/event, given that it does not create uncertainty with other participants. The same applies for denominations referring to events, team names, sponsor names, etc.

- (kk) In case of bets where there is reference to timeframes, they should be interpreted in the following way: “within the first 30 minutes” will include anything happening until 0 hours 29 minutes and 59 seconds; “between 10 to 20 minutes” will include anything happening from 10 minutes and 0 seconds until 19 minutes and 59 seconds.
- (ll) Unless listed either in conjunction with the bet offer, or else in the Sport Specific rules, bets referring to event/match duration which include non-full integer digits (E.g. 88.5 minutes or X.5 rounds) require the full completion of the full integer of the listed duration for them to be considered won. For example: a bet on Over/Under 88.5 minutes in a Tennis match will be settled as Over only if at least 89 full minutes are completed.
- (mm) Bally’s acknowledges that some bets might require the rounding-up of percentages, units or other criteria which are decisive for the settlement of the bet. Should that be the case, Bally’s reserves the right to adjust and settle accordingly.
- (nn) Any reference to goals scored by specific players will not count if they are defined as ‘own goals’ (scored in their own goals) unless otherwise stated.
- (oo) Any reference to confederation, nationality or similar will be subject to the definition by the governing body.
- (pp) Any medals won by a team/nation per competition will count as one (1) single medal regardless of the number of team members.
- (qq) Offers referring to individual player performances' over a particular period/tournament (example: Total Goals Scored by Player X during the World Cup) or confronting performances from 2 individual players during the course of the season (example: Which of Player X or Player Y will score most goals during the season), require all listed individuals to be an active participant in at least one more fixture applicable for the offer after bet acceptance for bets to stand.
- (rr) Any bets referring to “breaking” of records require the listed occurrence to be fully accomplished. Equalling the record will not be considered as having fully accomplished the feat. Only the listed occurrence will count for settlement purposes.

## **6. TATTERSALLS RULE 4**

(a) In the event of one non-runner or one non-Participant, the odds on the remaining runners or remaining Participants are reduced in accordance with the so-called Tattersalls Rule 4.

▪ Win Betting:

- Current odds of the withdrawn runner/Deductions in percentage of net gain

1.30 and lower	75%
1.31 to 1.40	70%
1.41 to 1.53	65%
1.54 to 1.62	60%
1.63 to 1.80	55%
1.81 to 1.95	50%
1.96 to 2.20	45%
2.21 to 2.50	40%
2.51 to 2.75	35%
2.76 to 3.25	30%
3.26 to 4.00	25%
4.01 to 5.00	20%
5.01 to 6.50	15%
6.51 to 10.00	10%
10.01 to 15.00	5%
15.01 and higher	No deductions made

▪ Place Betting:

- Current odds of the withdrawn runner/Deductions in percentage of net gain

1.06 and lower	55%
1.07 to 1.14	45%
1.15 to 1.25	40%
1.26 to 1.52	30%
1.53 to 1.85	25%
1.86 to 2.40	20%
2.41 to 3.15	15%
3.16 to 4.00	10%
4.01 to 5.00	5%
5.01 and higher	No deductions made

- (b) In the event of two or more non-runners or non-Participants, the total reduction shall not exceed 75%. The deduction in this case will be based on the aggregate odds of the withdrawn runners

### **C. SPORT SPECIFIC RULES**

#### **1. OLYMPIC AND CHAMPIONSHIP EVENTS**

- (a) All conditions stated in this section have priority to any other rule or condition.
- (b) All bets are valid provided that the event is held and decided during the championship and the year it refers to, regardless of any venue changes.
- (c) The previous clause is applicable to offers which reasonably fulfil any of the following criteria:
- i. the bet refers to events scheduled for the final phase of events forming part of Olympic, World and Continental competitions.
  - ii. the final phase of the event is time restricted.

#### **2. FOOTBALL**

- (a) All 'match' bets on American Football are determined on the basis of the result after the so called extra (over) time.
- (b) All 'match' offers will only be considered valid should there be less than 5 minutes of scheduled play left in the 4th Quarter/2nd Half, as applicable. Exception will be done for those the outcome of which have been decided prior to the abandonment and could not possibly be changed regardless of future events, which will be settled according to the decided outcome.

- (c) Offers referring to individual player performances' in a single match (example: Total Passing Yards Thrown by Player X) or confronting performances from 2 individual players during the course of a match (example: Which of Player X or Player Y will throw most Passing Yards), require all listed individuals to participate in at least one more play in the match, after bet acceptance for bets to stand.
- (d) Unless specifically stated or implied in the offer characteristics, settlement of Season bets will be based as per the classifications, definitions and tie-breaking rules as per NFL.com, or the official website of the competition (as applicable).
- (e) Unless otherwise specified, a typical NFL week/round schedule is considered as running from Thursday to the following Wednesday, as per local stadium time. Any events/offers not completed within the aforementioned timeframe will be settled as void, except for those offers the outcomes of which has already been decided and could not possibly be changed regardless of future events, which will be settled according to the decided outcome. Bets referring to events which have been rescheduled within the same week/round will remain valid as much as said events are played within timeframe above.
- (f) Matchday/Weekly props is where it is possible to bet on the performances and outcomes of a pre-defined selection of teams and/or individual players' occurrences happening in a collection of matches/events on a specified week/round/day/match day (example: Total Points Scored in matches from a specific Conference, Highest/Lowest Scoring team, Player Yardage markets etc). All applicable matches/events (including any rescheduling to be played within the aforementioned timeframe), must be completed and validated for the specified week/round/day/matchday for bets to stand except for those the outcomes of which has been decided prior to the abandonment and could not possibly be changed regardless of future events, which will be settled according to the decided outcome. In addition, offers referring to the performance of specified players require that all the specified players participate in at least one more play in the match, after bet acceptance for bets to stand.
- (g) Season bets, regardless whether these include outcomes obtained during Playoffs or otherwise, as well as offers referring to particular teams or player performances, will remain valid irrespective of eventual player trades, team movements, name changes, season length or playoff format changes during any point in the season.
- (h) Offers referring to individual player performances' (example: Total Passing Yards by Player X during the Playoffs) or confronting performances from 2 individual players over a particular period/tournament/season (example: Which of Player X or Player Y will score most Touchdowns during the Regular Season), require that all listed individuals must be an active participant in at least one more fixture applicable for the offer after bet acceptance for bets to stand.

- (i) Bets on Double Result (ie. predicting the outcome at Half Time combined with the result at the end of the 4th Quarter) will not take into account any outcomes deriving from Overtime.
- (j) First/Next Offensive Play markets are settled based on the first/next offensive play from scrimmage (as applicable), excluding Penalties. Should a kick-off be returned for a touchdown, bets will be settled with the outcome of the subsequent kick-off. For settlement purposes, incomplete/intercepted passes, Quarterback sacks or fumbles will be considered as "Pass Play" unless the Quarterback has passed the line of scrimmage, at which point it would be considered as "Run Play". Fumbles on exchanges to the Runningback will be considered as "Run Play".
- (k) Settlement on offers referring to "Offensive Yards" will be based on the net number of yards including any sack yardage lost. Such calculation would be done by adding the relevant passing and receiving yards and subtracting the number of yards lost to sacks from the total.
- (l) Offers referring to any team scoring a specified successive number of times unanswered will consider scorings tallied during eventual Overtime but excludes any PATs (points after Touchdowns or 2 point conversions).
- (m) "Team to call first/next Timeout" offers will not take into consideration for settlement purposes any timeouts lost through any other means such as failed challenges, coaches challenges and/or injuries.
- (n) Settlement on all penalty offers will be based on the penalty being accepted. Declined penalties do not count.
- (o) Bets referring to the outcome of a particular drive will be settled as void in case of an incomplete drive. In cases where Team A has the ball and fumbles with the ball being recovered by Team B who successively fumbles it back to Team A, the outcome will be settled as a "Turnover". Turnover on Downs (failed 4th Down attempt), will also be considered as a "Turnover". Should it happen that a punt is fumbled by the receiving team and recovered by the kicking team, bets will be settled as "Punt".
- (p) Offers on whether a 1st Down will be made, refer only to the team currently in possession achieving said accomplishment. Market will be settled as "YES" should a new set of "Downs" be achieved either by Run, Pass (including cases where a Touchdown is scored as a result) or an Automatic 1st Down Penalty. "Safety", "Field Goal" (irrespective whether the Field Goal being scored or not), fumbles or any change in possession, will settle the offer as "NO". Any Down replayed due to non-automatic penalties will not be considered for settlement purposes unless committed with 5 yards or less to go.
- (q) Settlement on which team will gain most Passing/Rushing yards will be based on the gross number of yards thrown/run, including any negative yarding for rushing.

- (r) For settlement purposes, bets on Touchdown scorers require the listed player to be part of the active roster for that match. Stakes on players which are not on the active roster will be refunded. In cases of “passing Touchdowns” only the player who catches the pass will be considered as the Touchdown scorer.
- (s) Player props and other stats-based offers will be settled according to the official match reports as published after the game by the governing body.
- (t) Unless otherwise specified in conjunction with the bet offer, bets on outcomes related to 2<sup>nd</sup> Half, will only take into consideration points and occurrences tallied/obtained during the specified timeframe and will not consider any points and occurrences tallied/obtained during eventual Overtime.
- (u) Offers referring to tackles made, will be settled according to tackles made on regular defensive plays only. This will be determined by the final defensive statistics in the official gamebook.

### **3. ATHLETICS**

- (a) Unless otherwise stated, all bets on Athletics are determined on the basis of the result after the final stage of that competition. If none of the listed participants takes part in the final stage, all bets will be void, unless the governing body follows specific tie-breaking procedures, in which case, these will be deemed valid.
- (b) All bet offers will be settled based on the first official result being presented. However, [the Operator] will take into account and settle/re-settle accordingly, following any changes to the official result issued within 24 hours after the event has taken place. For such eventuality to be considered, the protest must be attributable to incidents happening exclusively during the event, such as a line infringement, pushes or a false handover in a relay race, etc. No doping cases will be considered. The result available at the end of the aforementioned 24 hours will be deemed as binding regardless of any further protests, changes to the official result, etc.
- (c) If two or more participants take part in different heats during a competition, all Head-To-Head-offers between them will be considered void, unless there is a later stage in the competition that at least one of them qualifies for.
- (d) A participant that is disqualified due to infringement of the start procedure (false start) will be deemed as having taken part in the event.
- (e) The operator reserves the right to apply Tattersalls Rule 4, in cases of non-starters in any athletics events.

#### 4. AUSTRALIAN RULES FOOTBALL

- (a) Unless explicitly stated, should a match or else a specified period (ex. 1st Half, 3rd Quarter, etc.) end in a draw, all bets will be settled according to the so-called "dead-heat" rule, see Section (B)(5)(n). In such case the payout would be calculated after the odds are divided and then multiplied by the stake, irrespective of whether the net payout is lower than the Account Holder's stake.
- (b) Unless otherwise stated, all bets referring to matches will be settled on with the result at the end of 4th Quarter (normal time).
- (c) For any Offer referring to individual player performances' in a single match (example: Total Points Scored by Player X) stakes will be refunded, if the player is not in the starting 22. For any offer between two players (head to head matchups) stakes will be refunded if either player is not in the starting 22.
- (d) First Goalscorer in the match/1st Quarter – Bets will be voided on players who are not in the starting 22. Bets on First Goalscorer in the match, do not require the goal to be scored in the 1st Quarter. Should no goal be scored in the listed period, all bets will be settled as void, unless an option for "no goal" has been offered.
- (e) First Goalscorer in the 2nd, 3rd or 4th Quarter - All bets stand irrespective of the player's participation (or lack thereof) in the listed Quarter and the match. Should no goal be scored in the listed quarter all bets will be settled as void.
- (f) "Wire-to-Wire" betting refers to which team (if any) is leading the match at the end of each quarter.
- (g) Should any replay/extra matches be required to determine any position in the classification, league winners, etc., the outcomes deriving from these replays/extra matches will be used for the settlement of the respective bet offer.
- (h) For match betting on a Grand Final, the betting is specific to the upcoming match to be played, or the current match, in the case of live betting. Bets will not carry over to any replay and a new market will be added for any subsequent matches.
- (i) When settling offers which relate to the performances of two or more individuals/teams over a stipulated timeframe/competition, stages of elimination within the "Finals" will count for the settlement. Should two teams be eliminated at the same stage, the team that finished highest on the AFL ladder at the conclusion of the Regular Season will be considered as having achieved a better position.

- (j) All bets stand, regardless of change of venue.
- (k) Offers referring to individual player performances' (example: Total Points Scored by Player X during the Playoffs) or confronting performances from 2 individual players over a particular period/tournament/season (example: Which of Player X or Player Y will score most points during the Regular Season), require that all listed individuals must be an active participant in at least one more fixture applicable for the offer after bet acceptance for bets to stand.
- (l) For any "time of goal" offer (example: time of first goal) stoppages are not included. All bets are settled according to the match timeline on the official AFL website (no stoppages, time on is included, clock counts upward).
- (m) For all highest scoring quarter offers, the "Same amount" outcome settles on any 2 (or more) quarters being equal highest.
- (n) For all season offers, that are settled at the conclusion of the regular season, the official ladder position is used as the determining factor (i.e. Percentage determines tied positions). Similarly, for the "Team(s) with the Most Losses" offer, in the event of two or more teams recording the same number of losses, the winner will be determined as the team with the lower ladder position (i.e. Percentage determines tied positions).

## **5. BASEBALL**

- (a) Unless otherwise stated, bets on Baseball are determined on the basis of the result after any eventual extra innings, and regardless of the amount of extra innings played, as declared by the respective organising body. In case of a draw after the eventual extra innings, match bets will be settled as void.
- (b) A bet is declared void on a cancelled or postponed match which has not started, or in the case of a result not having been issued within twelve hours of the scheduled start time.
- (c) In the case of a shortened match, "Match" bets (aka Moneyline) will be settled, as per the rules of the respective governing body.
- (d) "Handicap", "Over/Under", "Odd/Even" and all other markets, including player performance markets, but except Moneyline require all scheduled innings to be completed, or at least 8.5 innings to be completed if the home team is in advantage, for bets to stand. This applies to all offers except those the outcome of which has been decided prior to the abandonment and could not possibly be changed regardless of future events. These will be settled according to the decided outcome.



- (e) With the exception of those offers where the start/participation of the listed pitcher(s) is specifically required for the market to be deemed valid, (example: Listed Pitcher Moneyline), whoever is chosen to be the starting pitcher of either team has no relevance on how offers are settled.
- (f) For settlement purposes "First Half" bets are deemed to be referring to the outcomes deriving from the first 5 innings. All 5 innings must be completed for bets to stand except for those offers the outcome of which has been decided prior to the abandonment and could not possibly be changed regardless of future events, which will be settled according to the decided outcome. For games played under a scheduled, shortened format, the first half innings will be shortened accordingly, for example "first half" bets in a 7 innings game refer to outcomes deriving from the first 4 innings.
- (g) Live Betting offers referring to individual player performances' in a single match (example: Total Hits by Player X) or confronting performances from 2 individual players during the course of a match (example: Which of Player X or Player Y will have most Hits), require all listed individuals to participate in at least one more play in the match, after bet acceptance for bets to stand. All Pre-Match markets involving hitters, require for the player to be listed as in the starting lineup, and to have at least one plate appearance. Those involving pitchers, require the Player to throw at least one pitch, for bets to stand. Offers referring to one or more players' performance in a given match, require that all listed players are included in the starting lineup, for bets to stand.
- (h) Unless specifically stated or implied in the offer characteristics, settlement of Season bets and Tournament or Playoff Totals will be based as per the classifications, definitions and tie-breaking rules as per MLB.com, or the official website of the competition (as applicable). Unless otherwise stated, cumulative amounts of such bets will include eventual prolongations (e.g. Extra Innings). "Head to Head" and "Over/Under" bets involving one or more players' performance in the tournament are considered valid given that all listed players take part in the tournament at some stage for bets to stand.
- (i) Offers referring to individual player performances' (example: Total Runs Scored by Player X during the Playoffs) or confronting performances from 2 individual players over a particular period/tournament/season (example: Which of Player X or Player Y will record most hits during the Regular Season), require that all listed individuals must be an active participant in at least one more game applicable for the offer after bet acceptance for bets to stand.
- (j) Season bets, regardless whether these include outcomes obtained during Playoffs or otherwise, as well as offers referring to particular teams or player performances will remain valid irrespective of eventual player trades, team movements, name changes, season length or playoff format changes during any point in the season.

- (k) Bets on the outcome of a particular period (example Inning X) or occurrences achieved during a time-limited period require the specified period to be completed with the exception of those offers the outcome of which is already determined before any interruption and/or any further continuance of play could not possibly produce a different outcome to said offers which will be settled accordingly. For settlement purposes, any Inning (including eventual extra innings) which does not require the Home Team to bat further, or at all, is considered to have been naturally concluded and all bets referring to the inning (example: Result of Inning X, Handicap (Spread) of Inning X, Over/Under (Total) Runs or Hits in Inning X) stand with the exception of those which specifically refer to the single performance of the Home team within the specified inning (example: Over/Under (Total) Runs scored by the Home Team in Inning X) which will be settled as void should the Home Team not bat at all during the specified Inning.
- (l) During certain events Bally's might decide to offer markets related to the outcome of a series of consecutive Regular Season matches playing between the listed teams during the specified timeframes. Settlement will include outcomes deriving from any doubleheaders as much as these are played within the specified timeframe. In cases where no drawn (tie) outcome has been made available for betting, bets will be settled as void should both of the listed teams win the same number of matches. All scheduled matches must be completed as per the rules of the governing body for bets to stand except for those the outcomes of which have been decided prior to the abandonment and could not possibly be changed regardless of future events, which will be settled according to the decided outcome.
- (m) Offers which confront or tally outcome and occurrences obtained/achieved by teams or players taking part in different matches not confronting each other (example: Team to score most runs in their respective match), require that all applicable matches are completed as per the rules of the governing body for bets to stand except for those the outcomes of which have been decided prior to the abandonment and could not possibly be changed regardless of future events, which will be settled according to the decided outcome. In cases where no drawn (tie) outcome has been made available for betting, bets will be settled as void should both of the listed teams/participants obtain/achieve the same amount.
- (n) Series winner results are settled according to which team wins most matches in the series of matches (including any doubleheaders) playing within the listed timeframe. Bets void if teams win the same number of matches. All scheduled matches must be completed as per the rules of the governing body for bets to stand except for those the outcomes of which have been decided prior to the abandonment and could not possibly be changed regardless of future events, which will be settled according to the decided outcome.

## **6. BASKETBALL**

- (a) All 'match' bets on Basketball are determined on the basis of the final result, including potential overtime, unless stated otherwise.

- (b) Bets referring to the match outcome (aka "Moneyline") from ties which are decided over two or more match-ups will have the "Including Overtime" offer voided in case the match ends in a draw and no further play is done in that particular match. Remaining markets (Totals, Handicaps etc) will be settled normally, based on the result at the end of play.
- (c) In multiple legged ties, all points collected during any overtime period will count for the final settlement of that particular match.
- (d) Offers referring to individual player performances' in a single match (example: Total Points Scored by Player X) or confronting performances from 2 individual players during the course of a match (example: Which of Player X or Player Y will get most Rebounds), require all listed individuals to participate in at least one more play in the match, after bet acceptance, for bets to stand.
- (e) All bets referring to aggregated Tournament Totals (such as Points, Rebounds, Assists, etc.) will be settled based on official statistics by the governing body. Unless otherwise stated, cumulative amounts of such bets will include eventual prolongations (e.g. Overtime).
- (f) All NBA and NCAA 'match' offers will only be considered valid should there be less than 5 minutes of scheduled play left in the 4th Quarter/2nd Half, as applicable. Exception will be done for those the outcome of which have been decided prior to the abandonment and could not possibly be changed regardless of future events, which will be settled according to the decided outcome.
- (g) Season bets, regardless whether these include outcomes obtained during Playoffs or otherwise, as well as offers referring to particular teams or player performances will remain valid irrespective of eventual player trades, team movements, name changes, season length or playoff format changes during any point in the season.
- (h) Offers referring to individual player performances' (example: Total Points Scored by Player X during the Playoffs) or confronting performances from 2 individual players over a particular period/tournament/season (example: Which of Player X or Player Y will win most rebounds during the Regular Season), require that all listed individuals must be an active participant in at least one more game applicable for the offer after bet acceptance for bets to stand.
- (i) Bets on Double Result (ie. predicting the outcome at Half Time combined with the result at the end of the 4<sup>th</sup> Quarter) will not take into account any outcomes deriving from Overtime.
- (j) Unless otherwise specified in conjunction with the bet offer, bets on outcomes related to 2<sup>nd</sup> Half, will only take into consideration points and occurrences tallied/obtained during the

specified timeframe and will not consider any points and occurrences tallied/obtained during eventual Overtime.

- (k) For settlement purposes a 'double-double' is considered to have occurred should the player register 10 or more in at least 2 of these categories in a single match (including during eventual overtime): Points Scored, Any Rebounds Won, Assists, Steals and/or Blocked Shots. A 'triple-double' is considered to have occurred should the player register 10 or more in at least 3 of the aforementioned categories in a single match (including during eventual overtime).
- (l) For 3 x 3 basketball:  
"Over/Under" and "Handicap" offers on unfinished matches the outcome of which is already determined before the interruption of play and/or where any further continuance of play could not possibly produce a different outcome to said offers, will be settled based on the result achieved until the interruption. For the calculation of these settlements, the minimum amount of occurrences, which should have been needed to bring the offer to the natural conclusion, will be added as necessary depending on the format of the match. Should this calculation produce a situation where no possible alterations could affect the outcome of the offer, this will be settled as such. See examples from the tennis-section for reference.

## **7. BEACH VOLLEYBALL**

- (a) All bets will remain valid as far as the match/offer is played within the tournament framework regardless of any changes in schedule, conditions, etc.
- (b) "Match" bet offers are based on the general principle of tournament progress or tournament win, depending on which phase of the competition the match refers to. The team progressing to the next round or winning the tournament is to be considered the winner of the bet regardless of match duration, withdrawals, disqualifications, etc. These bets require at least one set to be completed for bets to stand.
- (c) "Over/Under" offers on unfinished matches/events the outcome of which is already determined before the interruption and/or any further continuance of play could not possibly produce a different outcome to said offers, will be settled based on the result achieved until the interruption. For the calculation of these settlements, the minimum amount of occurrences which should have been needed to bring the offer to the natural conclusion will be added as necessary depending on the number of sets which the match is scheduled for. Should this calculation produce a situation where no possible alterations could affect the outcome of the offer, this will be settled as such. See examples from the Tennis section for reference.
- (d) "Handicap" offers require all scheduled sets to be completed for bets to stand except in those events the outcome of which is already determined before the interruption and/or any further continuance of play could not possibly produce a different outcome to said offers which will be settled accordingly. See examples from the Tennis section for reference.

- (e) All "Correct Score", "Odd/Even" and those offers which refer to the winner of a particular period in the match (example "E.g. Team to win the first set") require the relevant part of the match to be completed.

## **8. BOXING**

- (a) All offers will be settled according to the official result of the relevant governing body immediately as declared by the ring announcer at the end of the fight. No amendments made to the official result after being first announced, will be taken into consideration, except for those which the official organization effects to rectify clear cases of human errors by the ring announcer.
- (b) For settlement purposes, in case the match is interrupted for any reason in between rounds, (e.g. retirement before the start of a round, disqualification, failure to answer the bell), the fight will be deemed to have finished, at the end of the previous round. For all the "To go the Distance" offers, to be settled as yes, the official scheduled number of rounds, must be fully completed. In the event of a technical decision, before the end of the scheduled number of rounds, all bets will be settled as a win by decision.
- (c) Offers on fights declared as a "No Contest" or "Technical draw" (prior to the completion of 4 full rounds) will be settled as void, except for those offers the outcome of which have been decided prior to the decision, and which could not possibly be changed regardless of future events, will be settled according to the decided outcome.
- (d) If for any reason, the number of rounds in a fight is changed between the time of bet acceptance and the actual fight, offers which make specific reference to rounds, such as "Round betting", "Group of Rounds", "Over/Under", "Winning Method" and "To go the distance" will be declared void.
- (e) For settlement purposes, betting on rounds or groups of rounds refers to a fighter to win by KO (Knockout), TKO (Technical Knockout), or disqualification during that round or group of rounds. If for any reason, a points decision is awarded before the full number of scheduled rounds is completed (Technical Decision), offers such as "Alternate Round Betting", "Group of rounds" and "Over/under" will be declared void, unless the outcome is already determined.
- (f) Bets referring to round/fight duration represents the actual time passed in the round/fight, as applicable, depending on the scheduled round/fight duration. For example, a bet on Over 4.5 Total Rounds in a Boxing fight will be settled as Over once a minute and a half in the 5th Round has passed.

- (g) Any confirmed fight must be completed by 23:59 local time of the following day for bets to stand. Any changes in venue, location will not be deemed valid grounds for voiding of the offers.
- (h) In offers where a draw/tie is possible and odds have not been offered for such outcome, bets will be settled as void should the official result be declared as such. For settlement purposes, fights the outcome of which is declared as either a "Majority draw" or a "Split draw" are to be considered as a drawn/tied outcome and offers will be settled accordingly.
- (i) Settlement of statistics-based offers such as "Boxer X to be knocked down" or similar will be settled based on the results declared by the referee.

## 9. CRICKET

### (a) General Cricket Rules:

- i. In cases where no odds have been offered for a tie and the match/offer ends in a tie, bets would be settled according to the so-called "dead-heat" rule where the payout would be calculated after the odds are divided and multiplied by the stake, irrespective whether the net payout is lower than the Account Holder's stake. In competitions where other means are used to determine a winner after a tie (for example: 'Bowl out' or 'Super over') then offers will be settled based on the result after such prolongations are completed. The only exception to this rule is for "Match Odds" betting in Test/First Class/3, 4 or 5 day matches where, in the event of a tie, where both teams have completed two innings each and have scored exactly the same number of runs, bets on "Match Odds" will be settled as void.
- ii. For "Total Runs Over X" (Over/Under & Odd/Even) betting, "extras" and "penalty runs" (as per match scorecards) are included for settlement purposes. Bets will be void if the over is not completed unless a result has already been determined or the over has reached its 'natural conclusion' (e.g. innings end/declaration). The market refers only to the listed over (e.g. "5<sup>th</sup> over" refers to over number 5, i.e. the over directly following over number 4).
- iii. For "Total Runs Delivery X" (Over/Under & Odd/Even) betting, "extras" (but not "penalty runs") as per match scorecard are included for settlement purposes. Deliveries are counted from the start of the over, and additional deliveries (resulting from 'extras') will be counted consecutively and separately (e.g. If delivery 1 is a wide, the next ball is considered delivery 2).
- iv. For "Boundary Over X" (Yes/No) betting, any instance of the ball striking or clearing the boundary regardless of whether the ball comes off the bat shall be deemed a boundary. This includes wides, byes, leg byes & overthrows (e.g. any instance of an in play ball that hits or clears the boundary shall be settled as yes for that over). 4 runs that are "all run" between the wicket shall not be counted as a boundary. Bets will be void if the over is not completed unless a result has already been determined or the over has reached its 'natural conclusion'

(e.g. innings end, declaration). The market refers only to the listed over (e.g. "5<sup>th</sup> Over" refers to over number 5, i.e. the over directly following over number 4).

- v. For "Wicket Over X" (Yes/No) betting, the over must be completed for bets to stand, unless a wicket has already fallen or the innings reaches its natural conclusion (e.g. innings end, declaration).
- vi. For "Total Wides" (Over/Under) betting, settlement will be based on the "Runs" scored from "Wides" and not the number of "Wides" bowled. E.g. If a single wide delivery reaches the boundary it shall count as 5 total wides.
- vii. For "Method of Dismissal" betting, bets will be void if either player retires due to injury or any other reason, before the wicket falls or there are no further wickets.
- viii. For "Most Run Outs" betting, settlement will be based on the batting team not the fielding team. (E.g. run outs count for the team of the player that is dismissed).
- ix. For "Odd/Even" betting, a ball must be bowled for bets to stand.
- x. For any betting involving "ducks", a "duck" is defined as when a player is dismissed for a score of zero runs. Any player not-out for zero runs is not considered a duck.
- xi. For "Maiden in Match" betting, a maiden is considered any over bowled with no runs scored. Only completed overs with zero runs count. A minimum of 1over must be bowled for bets to stand. For settlement purposes leg-byes and byes are not applied to this bet offer, as per the match scorecard.
- xii. For all "4s" betting including but not limited to total 4s, most 4s & player's total 4s; any 'all run' 4s will not count towards the total. Over-throws that reach the boundary and are awarded to the batsman will be counted. No-balls that reach the boundary off the bat and are awarded to the batsman will be counted. Leg-byes & byes that reach the boundary are not included. Wides that reach the boundary are not included.
- xiii. Penalty runs awarded will be counted towards the over, interval and innings for settlement purposes, as per match scorecard. If penalty runs are not awarded to a specific over, they will only count towards innings runs.

**(b) Player Cricket Rules:**

- i. "Top Run Scorer" and "Top Wicket Taker" bets (including all variants by "Home Team", Away Team", "1st Innings" & "2nd Innings") placed on any player not in the starting 11 will be declared void. Bets on players who are selected but do not bat or field will be settled as losers.
- ii. In the event of a tie, dead heat rules as explained in Section (C)(7)(a)(i) will apply.

- iii. Additionally, for all limited overs matches the following will apply.
  - a. Betting requires a minimum of 20 overs to be bowled per innings of a One Day match, unless a team is all-out or the match is completed, or a minimum of 5 overs to be bowled per innings of a Twenty 20 match, T10 or Hundred match unless a team is all-out or the match is completed
- iv. Additionally, for all Test matches & 4/5 day matches the following will apply.
  - a. Betting requires 50 overs to be completed for bets to stand, unless the Innings has reached its natural conclusion (including 'Innings declared').
- v. All "Top Wicket Taker" bets will be settled solely on the number of wickets taken regardless of the number of runs conceded.
- vi. All "Top Wicket Taker" bets will be void if no wicket is taken by any bowler in that innings.
- vii. This rule excludes any Tournament or Series market as covered in Section (C)(7)(e).
- viii. "Man of the Match/Player of the Match" bets placed on any player not in the starting 11 will be declared void. Bets on players who are selected but do not bat or bowl will be settled as losers. In the event of a tie, dead heat rules will apply as explained in Section (C)(7)(a)(i).
- ix. "Next Man Out" & "First Batsman Dismissed" bets will be settled as void if either player retires due to injury or any other reason before the wicket falls or if there are no further wickets. Both named batsmen must be batting at the fall of the nominated wicket for bets to stand.
- x. "Most Runs" (2-way & 3-way) matchups, require that both/all players reach the batting crease while a ball is bowled, though it is not necessary they face a ball nor must the quoted players have batted together, otherwise bets will be void. In the event of a tie, if no draw price was offered, dead heat rules will apply as explained in Section (C)(7)(a)(i).
- xi. "Most Wickets" (2-way & 3-way) matchups, require that both/all players bowl at least 1 ball for bets to stand. In the event of a tie, if no draw price was offered, dead heat rules will apply as explained in Section (C)(7)(a)(i).
- xii. "Player Performance" bets placed on any player not in the starting 11 will be declared void. Settlement is based on the following points based scoring system:
  - a. 1 point per run scored (batsman only);
  - b. 10 points per catch taken (fielder or wicket keeper only);
  - c. 20 points per wicket (bowler only);
  - d. 25 points per stumping (wicket keeper only).
- xiii. Additionally, for all limited overs matches, all bets will be declared as void should the number of overs be reduced due to weather (or any other reason) from the standard scheduled number of overs in a Twenty 20 match or any other limited overs match. Should the outcome of such offers be already decided before the interruption and no further play would possibly change the outcome of such bets, then these will be settled accordingly.



- xiv. For “Player to take 5 or more Wickets/Player’s Total Wickets/Player to take a wicket” bets placed on any player not in the starting 11 will be declared void. Bets will also be void if the player does not bowl a ball.
- xv. “Player to take make a Duck” (Yes/No) bets require that the player reaches the batting crease while a ball is bowled, though it is not necessary they face a ball.
- xvi. For “Player to score Fastest 50/Century” betting, settlement is based on the least number of balls faced to reach the milestone (either 50 runs or 100 runs). In the event of a tie, dead heat rules will apply as explained in Section (C)(7)(a)(i).
- xvii. For “Race to X Runs” bets, both players must open the batting for bets to stand.
- xviii. “Player’s Total Runs/Player’s Total 4s/Player’s Total 6s” (Over/Under) betting requires that the player reach the batting crease while a ball is bowled, though it is not necessary they face a ball. In cases where a batsman's innings is ended by weather or bad light, all bets where a result has not been determined will be declared void. A result is deemed to have been determined if a batsman has passed the run total at which the bet was accepted, has been dismissed or an innings completed/declaration made. For example, if a Batsman's score stands at 50 ‘Not-Out’ when a game or innings is terminated due to bad light or rain, all bets on 50.5 runs will be voided unless the game has reached its natural conclusion. However, all bets on Over 49.5 Runs will be considered as winning while bets on Under 49.5 Runs will be settled as losing. Should a batsman retire due to injury or any other reason, his score at the end of his team's innings will be considered as the result for that bet. Additionally, for all limited overs matches, all bets will be declared as void should the number of overs be reduced due to weather (or any other reason) from the standard scheduled number of overs in a Twenty 20 match or any other limited overs match. Should the outcome of such offers be already decided before the interruption and no further play would possibly change the outcome of such bets, then these will be settled accordingly.
- xix. “Player to Score 50/Half Century” (Yes/No) betting requires that the player reach the batting crease while a ball is bowled, though it is not necessary that they face a ball. A player is deemed to have scored 50 or a ‘Half century’ once their score is 50 or more runs regardless of whether the player scores a century or more. In cases where a batsman's innings is ended by weather or bad light, all bets where a result has not been determined will be declared void, unless the game has reached a natural conclusion. Should a batsman retire due to injury or any other reason, his score at the end of his team's innings will be considered as the result for that bet. Additionally, for all limited overs matches, should the intervention of rain (or any other delay) result in the number of overs being reduced from those initially scheduled at the time the bet was accepted, then all open (player to score 50) bets will be declared void granted that the reduction is 10% or more of those scheduled. If the reduction is less than 10% of the scheduled overs at the time the bet was accepted, then bets will stand. If a team innings is 10 overs or less, then any reduction in overs will void bets. Should

the outcome of such offers be already decided before the interruption and no further play could possibly change the outcome of such bets, then these will be settled accordingly.

- xx. "Player to Score 100/Century/200/Double Century" (Yes/No) betting requires that the player reach the batting crease while a ball is bowled, though not necessarily facing a ball. A player is deemed to have scored 100 or a 'Century' once their score is 100 or more runs regardless of whether the player scores a double century or more. Similarly, a player is deemed to have scored 200 or a "Double Century" once their score is 200 or more runs. In cases where a batsman's innings is ended by weather or bad light, all bets where a result has not been determined will be declared void. Should a batsman retire due to injury or any other reason, his score at the end of his team's innings will be considered as the result for that bet. Additionally, for all limited overs matches, should the intervention of rain (or any other delay) result in the number of overs being reduced from those initially scheduled at the time the bet was accepted, then all open (player to score 100/200) bets will be declared void granted that the reduction is 10% or more of those scheduled. If the reduction is less than 10% of the scheduled overs at the time the bet was accepted, then bets will stand. If a team innings is 10 overs or less, then any reduction in overs will void bets. Should the outcome of such offers be already decided before the interruption and no further play would possibly change the outcome of such bets, then these will be settled accordingly.

**(c) Limited Overs Cricket:**

- i. Should a match be transferred to a 'reserve' day, all bets will remain valid as long as the game commences within 48hrs of the original, scheduled start time.
- ii. Match odds (head to head) betting pays on the official result. In the event of a tie, dead heat rules as explained in Clause 1 of the General Cricket Rules will apply unless a subsequent tiebreaker method is used to determine the winner (e.g. super over, bowl-off), in which case the outcome will be settled on the result of this method. Should the match be declared a 'no-result' all bets are void.
- iii. If any 'Super Over' or tie-breaker is required; any runs, wickets or any other stat that may occur in the super over/tie breaker do not count towards any betting market (except match result) including player bet offers & team totals (e.g. Top batsman/bowler, player runs, total 6's, to take at least X wickets). This rule does not apply to specific bet offers relating to 'Super Overs' (e.g. Super Over Total Runs).
- iv. For "Match Handicap / Winning Margin" betting, settlement will depend on whether the winning team bats 1st or 2nd. If the team batting 1st wins, then the runs handicap will be used for settlement. If the team batting 2nd wins then the wickets handicap will be used for settlement. All bets will be declared as void should the number of overs be reduced due to weather (or any other reason) from the standard scheduled number of overs in a Twenty 20 match or any other limited overs match.

- v. For “Highest 1st 6/15 Overs” all bets will be declared as void should the number of overs in the match be reduced due to weather (or any other reason) from the scheduled number of overs at the time the bet was accepted (whether standard or already reduced). Should the outcome of such offers be already decided before the interruption and no further play would possibly change the outcome of such bets, then these will be settled accordingly.
- vi. In the event of a tie, if no draw price was offered, dead heat rules as explained in Clause 1 of the General Cricket Rules will apply.
- vii. “Highest Total 1st X Overs” bets will be void should the intervention of rain (or any other delay) result in the number of overs in the match being reduced from those initially scheduled at the time the bet was accepted. Should the outcome of such offers be already decided before the interruption and no further play could possibly change the outcome of such bets, then these will be settled accordingly.
- viii. “Highest Opening Partnership” requires that both sides complete their opening partnerships with the exception of those situations where an outcome has already been determined. An opening partnership is considered to have begun once the first ball is bowled in a team innings, and lasts until the fall of 1st wicket or, should no 1st wicket fall, the innings reaching its natural conclusion. In the event of a tie, if no draw price was offered, dead heat rules as explained in Clause 1 of the General Cricket Rules will apply.
- ix. Additionally, all (highest opening partnership) bets will be declared as void should the number of overs in the match be reduced due to weather (or any other reason) from the scheduled number of overs at the time the bet was accepted (whether standard or already reduced). Should the outcome of such offers be already decided before the interruption and no further play would possibly change the outcome of such bets, then these will be settled accordingly.
- x. In “Fall of Next Wicket” & “Opening Partnership” (Over/Under) betting, should either batsman retire due to injury or any other reason before a result has been determined all bets placed before the retirement will be declared void; bets taken after the first ball of the new partnership will stand. A result is deemed to have been determined if the partnership total has passed the run total at which the bet was accepted. If a team reaches their target, the total achieved by the batting team will be the result of the market. If a partnership is disrupted due to weather all bets will stand, unless there is no further play in the match. In such case all bets where a result has not been determined will be declared void.
- xi. In relation to the over number at the fall of next wicket, any quoted half refers to the whole over number not the specific balls bowled in each over (e.g. over/under 5.5 refers to either ‘any delivery in over 5 & earlier’ or ‘any delivery in over 6 & later’).
- xii. Additionally, all (F.O.W) bets will be declared as void should the number of overs in the match be reduced due to weather (or any other reason) from the scheduled number of

overs at the time the bet was accepted (whether standard or already reduced). Should the outcome of such offers be already decided before the interruption and no further play would possibly change the outcome of such bets, then these will be settled accordingly.

- xiii. For “Total Runs – Innings X” (Over/Under) (e.g. Total Team Runs) betting, all bets will be declared as void should the number of overs in the match be reduced due to weather (or any other reason) from the scheduled number of overs at the time the bet was accepted (whether standard or already reduced). Should the outcome of such offers be already decided before the interruption and no further play would possibly change the outcome of such bets, then these will be settled accordingly. For the avoidance of doubt: Any bets taken after the number of overs has been reduced will stand unless there is a further reduction.
- xiv. For “Total Runs – Innings X, Overs X-X” (Over/Under) (e.g. Total Runs – Home Team, Overs 1-15) betting, all bets will be declared as void should the number of overs be reduced due to weather (or any other reason) from the scheduled number of overs in the match at the time the bet was accepted (whether standard or already reduced). Should the outcome of such offers have already been decided before the interruption and no further play would possibly change the outcome of such bets, then these will be settled accordingly. For the avoidance of doubt: Any bets taken after the number of overs has been reduced will stand unless there is a further reduction.
- xv. For “Total 4s/6s/Boundaries/Wickets” (Over/Under) betting, all bets will be declared as void should the number of overs be reduced due to weather (or any other reason) from the scheduled number of overs in the match at the time the bet was accepted (whether standard or already reduced). Should the outcome of such offers have already been decided before the interruption and no further play would possibly change the outcome of such bets, then these will be settled accordingly.
- xvi. Leg-bye and byes that reach/pass the boundary do not count towards total 4s/6s. Overthrows awarded to the batsman do count. Wides that reach the boundary are not counted. No-balls that reach the boundary off the bat and are awarded to the batsman will be counted.
- xvii. For “Most Fours/Sixes/Wides/Run-outs/Boundaries/Ducks/Extras” betting, should the intervention of rain (or any other delay) result in the number of overs being reduced from those initially scheduled at the time the bet was accepted, then all open (Most 'X') bets will be declared void granted that the reduction is 10% or more of those scheduled. If the reduction is less than 10% of the scheduled overs at the time the bet was accepted, then bets will stand. If a team innings is 10 overs or less, then any reduction in overs will void (most 'x') bets. Should the outcome of such offers be already decided before the interruption and no further play would possibly change the outcome of such bets, then these will be settled accordingly. Leg-bye and byes that reach/pass the boundary do not count towards total 4s/6s.

- xviii. In the event of a tie, if no draw price was offered, dead heat rules as explained in Clause 1 of the General Cricket Rules will apply.
- xix. For “Total Wides/Run-outs/Ducks/Extras/Stumpings” (Over/Under) betting, all bets will be declared as void should the number of overs be reduced due to weather (or any other reason) from the scheduled number of overs in the match at the time the bet was accepted (whether standard or already reduced). Should the outcome of such offers have already been decided before the interruption and no further play would possibly change the outcome of such bets, then these will be settled accordingly. For wides and extras, settlement will include the runs scored from wides and not just the number of wides bowled.
- xx. For “Highest Individual Score”, all bets will be declared as void should the number of overs in the match be reduced due to weather (or any other reason) from the standard scheduled number of overs in a Twenty 20 match or any other limited overs match. Should the outcome of such offers be already decided before the interruption then these will be settled accordingly.
- xxi. For “Team of Top Run Scorer” betting, should the intervention of rain (or any other delay) result in the number of overs being reduced from those initially scheduled at the time the bet was accepted, then all open (team of top run scorer) bets will be declared void granted that the reduction is 10% or more of those scheduled. If the reduction is less than 10% of the scheduled overs at the time the bet was accepted, then bets will stand. If a team innings is 10 overs or less, then any reduction in overs will void bets. Should the outcome of such offers be already decided before the interruption and no further play would possibly change the outcome of such bets, then these will be settled accordingly. In the event of a tie, if no draw price was offered, dead heat rules as explained in Clause 1 of the General Cricket Rules will apply.
- xxii. For “Fifty/Century in Match” (Yes/No) betting, should the intervention of rain (or any other delay) result in the number of overs being reduced from those initially scheduled at the time the bet was accepted, then all open (fifty/century in match) bets will be declared void granted that the reduction is 10% or more of those scheduled. If the reduction is less than 10% of the scheduled overs at the time the bet was accepted, then bets will stand. If a team innings is 10 overs or less, then any reduction in overs will void (Fifty/Century in Match) bets. Should the outcome of such offers be already decided before the interruption and no further play would possibly change the outcome of such bets, then these will be settled accordingly.
- xxiii. For “Highest Total Runs in an Over/Maximum Runs in an Over” (Over/Under) bets will be settled on the greatest number of runs (including extras) scored in any one over of either innings in the match.
- xxiv. All bets will be declared as void should the number of overs be reduced due to weather (or any other reason) from the scheduled number of overs at the time the bet was accepted

(whether standard or already reduced). Should the outcome of such offers be already decided before the interruption and no further play would possibly change the outcome of such bets, then these will be settled accordingly.

**(d) Test Matches/First Class Matches/ 3, 4 or 5 day Matches:**

- i. If a match is officially abandoned (e.g. due to dangerous pitch conditions) then all undecided bets on the match are void.
- ii. For “Match Odds” betting in Test/First Class/3, 4 or 5 day matches, in the event of a tie where both teams have completed two innings each and have scored exactly the same number of runs, bets on “Match Odds” will be void, with stakes being refunded.  
In Test and First Class Cricket matches, the match winner will be settled as determined by the competition’s official governing body. If the governing body states that the match has been drawn, then only bets on draw/tie will win on the 3-way match odds market, while bets on either team to win the match will be lost.
- iii. For “Draw No Bet” betting, in the event of a draw or tie bets are void & therefore refunded.
- iv. For “Double Chance” betting, in the event of a tie where both teams have completed two innings each and have scored exactly the same number of runs, bets will be void & therefore refunded.
- v. For “Most Points” betting, offers will be settled based on who has the most points awarded for the match (e.g. Sheffield Shield). In the event of a tie, if no draw price was offered, dead heat rules as explained in Section (C)(7)(a)(i).
- vi. “Highest Opening Partnership” bets require that both sides complete their opening partnerships with the exception of those situations where an outcome has already been determined. Unless otherwise stated, highest opening partnership refers to the first innings of each team only. In the event of a tie, if no draw price was offered, dead heat rules as explained in Section (C)(7)(a)(i).
- vii. In “Fall of Next Wicket” & “Opening Partnership” (Over/Under) betting, should either batsman retire due to injury or any other reason before a result has been determined all bets will be declared void. A result is deemed to have been determined if the Innings total has passed the run total at which the bet was accepted. If a team declares or reaches their target, the total achieved by the batting team will be the result of the market. If a partnership is disrupted due to weather all bets will stand, unless there is no further play in the match. In such case all bets where a result has not been determined will be declared void. Extras and penalty runs awarded before the fall of wicket or during the partnership, according to the match scorecard, will be counted.

- viii. In relation to the over number at the fall of next wicket, any quoted half refers to the whole over number not the specific balls bowled in each over (e.g. over/under 5.5 refers to either 'any delivery in over 5 & earlier' or 'any delivery in over 6 & later').
- ix. For "Total Runs - Innings X" (Over/Under) (e.g. Total Team runs) betting, all bets will be void if 50 overs are not bowled, unless an innings has reached its natural conclusion, or is declared. If an innings is declared at any point bets will be settled on the declaration total. Extras and penalty runs awarded during the innings, according to the match scorecard, will be counted.
- x. "Session Runs" betting requires 20 overs to be bowled in a session for bets to stand. Bets are settled on the total number of runs in the session regardless of which team scores the runs. Extras and penalty runs awarded during the session, according to the match scorecard, will be counted.
- xi. "Session Wickets" betting requires 20 overs to be bowled in a session for bets to stand. Bets are settled on the total number of wickets lost in the session regardless of which team loses them.
- xii. For any betting involving "Session", the following definition of each session will apply to day matches.
- Day X, Session 1 (Start of play until Lunch is taken)
  - Day X, Session 2 (Lunch until Tea is taken)
  - Day X, Session 3 (Tea until stumps/close of play for the day)
- xiii. The following definition of each session will apply to day/night matches.
- Day X, Session 1 (Start of play until tea is taken)
  - Day X, Session 2 (Tea until dinner is taken)
  - Day X, Session 3 (Dinner until stumps/close of play for the day)
- xiv. For "Test Match Finish" betting, where a match finishes in a draw, the winner will be deemed as 'Day 5, Session 3'. If a match is officially abandoned (e.g. due to dangerous pitch conditions) then all bets are void.
- xv. For "Team to Lead after First Innings" betting, both teams are required to be bowled out or declare their first innings for bets to stand. In the event of a tie, if no draw price was offered, dead heat rules as explained in Section (C)(7)(a)(i).
- xvi. "First Innings Century" offers require 50 overs to be bowled unless a result has already been determined or the innings has reached its natural conclusion (including innings declared).
- xvii. For "Fifty/Century/Double Century in match" in either Test or First class matches, bets will be void in drawn matches where the number of overs bowled is less than 200, unless a result has already been determined.

- xviii. For "Fifty/Century/Double Century in match" in 'Home/Away 1st Innings' of either Test or First class matches, bets will be void unless the Innings reaches its natural conclusion (including 'Innings declared') or a result has already been determined.
- xix. For "Fifty/Century/Double Century in match" in Either 1st Innings of either Test or First-class matches, bets will be void unless both Innings reach their natural conclusion (including 'Innings declared') or a result has already been determined.
- xx. For "Fifty/Century/Double Century in match" in 'Home/Away 2nd Innings' of either Test or First-class matches, bets will be void in case the number of overs bowled for that Innings is less than 50, unless a result has already been determined.
- xxi. "Team of Top Run Scorer" betting will be settled of the top run scorer for either the 1st or 2nd innings of either team, i.e. the team of the highest individual run scorer in the match regardless of the overall match result. Bets will be void in drawn matches where the number of overs bowled is less than 200. In the event of a tie, if no draw price was offered, dead heat rules will apply as explained in Section (C)(7)(a)(i).

**(e) Series/Tournament Betting**

- i. Should no draw odds be offered for a "Series Winner" bet and the series is drawn, all bets will be declared void, unless dead heat rule was specified (as explained in Section (C)(7)(a)(i)).
- ii. If a tournament is not completed but a winner or winners are declared by the governing body, bets are paid on the winner(s) as declared. Dead heat rules as explained in Section (C)(7)(a)(i) might apply. Should no winner be declared then all bets will be settled as void.
- iii. All tournament betting includes Finals/Playoffs, unless otherwise stated.
- iv. For "Series Score" (Correct Series Score) betting, if for any reason the number of matches in a series is changed and does not reflect the number envisaged in the offer then all bets will be declared void.
- v. For "Top Series Run Scorer/Wicket Taker" & "Top Tournament Batsman/Bowler" betting, where a tie occurs dead heat rules will apply as explained in Section (C)(7)(a)(i). No refunds will be issued on players not participating. At least one game must be completed in the tournament/series for bets to stand.
- vi. Bets referring to a particular player/teams' performances in a Series/Tournament will not take into account any statistics accumulated from warm-up matches.
- vii. For "Series Handicap" betting, all bets will be settled on the "series score" result not the runs scored in the series. If for any reason the number of matches in a series changes then all bets will be declared void.



- viii. For "To Win a Test in Series" & "Total Test Wins/Draws" betting, if for any reason the number of matches in a series changes then all bets will be declared void with the exception of those situations where an outcome has already been determined.

## **10. CYCLING (ROAD & TRACK)**

- (a) Settlement of offers will be based upon the rider/team achieving the highest position at the end of the stage/event.
- (b) The decisive factor in settling bets will be the highest placing in the specified event as listed by the official organisation at the time of the podium presentation, disregarding subsequent disqualifications, changes to the official result, etc.
- (c) All "Head to Head" and "Over/Under" bets featuring the performance of one or more riders in an event/stage are considered valid given that all listed riders start the relative event/stage and at least one completes the said event/stage.
- (d) Bets referring to the outcome upon completion of the event require that the specified event is considered as completed in full and its result is declared, otherwise bets will be declared void, unless the result is already determined. In case the full number of stages for an event is not totally completed, or if the organizers decide to remove the result of certain stages from the computation of the official result, then the bets will be deemed valid granted that the number of the excluded stages does not exceed 25% of the pre-established number of stages (excluding prologue) at the beginning of the competition.
- (e) All bets will be deemed as valid provided that the event or the relative stage to which the bet refers to, is played within the same year, unless other arrangements have been agreed to.
- (f) Bets on performances in a particular stage stand regardless of any route modifications which the organizers might deem fit to consider and apply during the stage. Exception to this is the case where a stage which has particular characteristics (E.g.: a Mountains stage) is changed by the organizers, before the stage starts, into a stage which has other predominant characteristics (E.g.: Time Trial or low-lying stage). In such case bets which have been placed before the announcement of the change in stage concept will be declared void.
- (g) Unless otherwise specified, in a team/rider performance bet offer in a specific event (such as Total Stage wins by Team/Rider X in Tour Y) or "Head to Head" bet offers involving two riders/teams performances in specific events, occurrences happening in events which are given any of the following denominations will not count towards the settlement: Prologue, Team Time Trial.

## **11. CYCLO CROSS**

- (a) Terms and conditions stated for Cycling apply where applicable.

## **12. SOCCER**

- (a) First/Next Goalscorer – The bet refers to a specific player being the scorer of the listed goal within the applicable timeframe, or else being the first scorer for his team (E.g. “First Goalscorer – Team X”). Bets will be voided on players who do not take part in the match or else come on the field of play after the listed goal to which the bet refers to has been scored. Own goals do not count for the settlement of this offer. Should the goal to which the bet refers to be deemed as an own goal, the next player to score a goal which is not an own goal and conforms with the bet offer parameters will be deemed as the winning outcome. In case no goals (or no further goals, as applicable) is/are scored which are not own goals and fulfil the remaining bet offer parameters, all bets will be considered lost, unless an applicable option has been listed within the offer.
- (b) Last Goalscorer – The bet refers to a specific player being the scorer of the last goal either during a particular timeframe of the event (E.g. “Last goal in the match” or “Last goal in the 1st Half”), or else being the last scorer for his team (E.g. “Last Goalscorer – Team X”). Bets will be voided only on players who do not take part in the match at all. In all other instances bets will remain valid, irrespective of the time of inclusion/substitution of the player. Own goals do not count for the settlement of this offer. Should the goal to which the bet refers to be deemed as an own goal, the previous player to score a goal which is not an own goal and conforms with the bet offer parameters will be deemed as the winning outcome. In case no goals (or no previous goals, as applicable) is/are scored which are not own goals and fulfil the remaining bet offer parameters, all bets will be considered lost.
- (c) "Scorecast" and "Matchcast" are bet offers where it is possible to bet simultaneously on a particular occurrence (e.g. First Goalscorer) combined with another from the same, or related event (e.g. Correct Score in the match, or match outcome). Should the bet refer to First or Last Goal Scorer, terms and conditions as stated in Section (C)(9)(a) and Section (C)(9)(b) will apply, where applicable. Bets will be voided on players who do not take part in the match at all. In all other instances bets will remain valid, irrespective of the time of inclusion/substitution of the player. Own goals do not count for the settlement of this offer.
- (d) Unless otherwise specified, or indicated in conjunction with the bet offer, all bets placed before match start related to whether a specific player(s) will manage to score any number of goals, require the listed player(s) to play from the start of the match to be valid. Similar type of bets placed after the relevant match has started will be settled as void should the listed player(s) not

take any further part in the match for whatever reason after bet acceptance. Own goals will never count as a goal scored for any selected player.

- (e) Offers referring to individual player performances in a single match (example: Total Goals Scored by Player X) or confronting performances from 2 individual players during the course of a match (example: Which of Player X or Player Y will score most Goals), require all listed individuals to play from the start of the match for bets to stand.
- (f) Offers referring to individual player performances' (example: Total Goals Scored by Player X during the World Cup) or confronting performances from 2 individual players over a particular period/tournament/season (example: Which of Player X or Player Y will score most goals during the league), require that all listed individuals must be an active participant in at least one more fixture applicable for the offer after bet acceptance for bets to stand.
- (g) All bets referring to aggregated Tournament Totals (such as Goals, Corners, , etc.) will be settled based on official statistics by the governing body. Unless otherwise stated, cumulative amounts of such bets will include eventual prolongations (e.g. Extra Time) but not Penalty Shoot Outs.
- (h) Unless specifically stated, all bets referring to a particular team winning a number/selection of trophies in the same season will be based on the particular team's performance within the following competitions: the domestic league, the apparent equivalent of the respective FA Cup and League Cup as well as the Champions League or Europa League. Other trophies (e.g. domestic and European Super Cup, World Club Cup) do not count.
- (i) The "Domestic Double" is to be considered as the team's victory in the apparent equivalent of the respective domestic league and FA Cup.
- (j) Bets on whether a particular player(s) will manage to score from certain areas of the pitch (E.g. from outside the 'penalty box') will be settled based on the position of the ball at the time the shot was struck by the player, irrelevant of any further deflections which the ball trajectory might incur following the initial shot. For the sake of clarity, it is to be understood that the lines delineating the 'penalty box' are to be considered as an integral part of such area of the pitch. Thus, should a shot be struck with the ball hovering above, or touching, even partially, said lines, the shot will not be considered as having been outside the box.
- (k) Bets on whether a particular player(s) will manage to hit the cross bar, goal post or any other part of the frame delineating the goal area will only be settled as having accomplished such feat if the shot does not result directly in a goal being awarded exactly after the ball hits a part of the goal frame. Settlement will only take into consideration shots aimed at the goal frame

defended by the opponents of the listed player(s) team. Should a player have a shot which hits the post their team defends this will not be considered as having accomplished such feat.

- (l) During certain events Bally's might decide to offer for betting a reduced selection of participants (E.g. Any unlisted Team X player) or else a single participant as a representation of the whole squad (E.g. "Any Team X player"). In both cases for settlement purposes, all unlisted squad members are to be deemed as starters (and settled as such), including substitutes, regardless whether they take part in the match or not.
- (m) Bets on the performance of players starting the match on the bench will be settled as void if the player is either listed in the starting XI or does not take part in the match at all.
- (n) On offers such as Next Goalscorer, Next Assist and Man of the Match, bets will be voided should the chosen player not take part in the match at all or had no possibility to accomplish such feat during the specified timeframe.
- (o) Bets on "Next Assist" for a particular goal will be settled as void should the governing body declare the specified goal as having been unassisted, the specified goal is an own goal and/or no more goals are scored in the match during the specified timeframe.
- (p) Bets referring to penalty kicks conversion and/or outcome will be settled according to the outcome occurred on the field of play as per the rules governing that specific scenario and in cases of penalty shoot-outs will remain valid regardless of the format employed by the governing body during the shoot-out. Bets stand in case the penalty is ordered to be re-taken and will be settled with the outcome achieved from the re-taken penalty.

As a general principle, settlement will be based on the concept that unless the penalty kick results in a goal being awarded (and settled accordingly), the first person/object/location (as applicable) which the ball initially touches after being kicked will be considered as the winning outcome, disregarding any other persons/objects the ball hits in its subsequent trajectory following any previous deflection, if any. The following examples are being issued as a general guideline on settlement:

"Goal" would be the winning outcome in case of the following scored penalties scenarios:

- Any penalty kick which ends up as a goal without it being deflected;
- Goalkeeper touches the penalty kick but ball ends up as goal;
- Penalty kick touches the woodwork before ending up in goal.

"Save" would be the winning outcome in case of the following missed penalties scenarios:

- Goalkeeper deflects the penalty kick to outside the goal frame;
- Goalkeeper deflects the penalty kick onto the post/crossbar.

"Woodwork" would be the winning outcome in case of the following missed penalties scenarios:

- ☐ Penalty kick hits the woodwork before it is touched/saved by the goalkeeper;
- ☐ Penalty kick hits the woodwork and ball goes outside the goal frame.

"Any other Miss" would be the winning outcome in case of any penalty kick which without any deflection either by the goalkeeper or by the woodwork ends up outside the goal frame:

Exception to the above scenarios would be in in case of penalty shoot-outs, should the ball hit the woodwork, bounce on the goalkeeper and end in goal, such penalty will be considered as having been scored while should said situation occur during any other part of the match which is not a penalty shoot-out, the penalty taker would be considered as having missed to score and "hitting the woodwork" will be considered as the winning outcome.

- (q) Any decision taken by the Video Assistant Referee (VAR) which conflicts with the original decision sanctioned by the officials on the pitch (including non-decisions like allowing play to continue before reviewing the video), thus altering the understood state of the match at the time of bet placement, will result in all bets placed in the timeframe between the actual occurrence of the original incident and the referee's final decision on the incident being deemed as void, unless the odds offered on the specific bet offer are unaffected by the use of VAR or have already been accounted for in the odds offered at the time of bet acceptance. Settlement on all other unrelated bet-offers, including those determined by any play between the time of the original incident and the decision following the VAR review, which are not influenced/altered by the VAR decision will stand.

For resulting purposes VAR reviews, and the decisions emanating from said reviews, are to be considered as having happened at the time of the original incident for which the VAR would be eventually used even if play has not been immediately interrupted. Bally's reserves the right, in accordance with Section (A)(10)(a), to reverse any previously settled offers where the settlement becomes inaccurate following the final referee decision, providing said decision is taken and communicated before the conclusion of the match and/or timeframe listed.

In order to avoid any doubts, Bally's will consider the VAR as having been used if it is understood from the referee's gestures (ex. hand gestures, stopping the match to review the incident themselves), and/or the VAR usage is confirmed by the match report issued by the official organization. In cases where it is unclear whether the VAR has been used due to missing TV coverage and/or conflicting reports, Bally's will settle the bets based on the information acquired from feed providers and reputable online sources on the basis of equity.

- (r) Any reference to “Free Kicks” both when presented as a single outcome, as well as an occurrence will also take into consideration instances awarded for offsidess and any other violation except those sanctioned with a penalty.
- (s) Offers referring to specific player(s) playing the whole match require the specified player(s) to start the match for bets to stand. For settlement purposes, bets will be settled as YES only if the specified player(s) is/are neither substituted nor sent off during Regular Time only. Eventual extra time does not count.

### **13. GOLF**

- (a) All bets will be deemed as valid as much as the Tournament, or the relative round to which the bet refers to, is played within the same sporting season and within 3 months from the last scheduled date (as per local course time), as issued by the governing body, irrespective of any time delays, unless other arrangements have been agreed to.
- (b) All bets referring to Tournament Performance, including but not limited to Winner, Place, Each-way, Winner without X, Group Betting, Top Nationality, Individual Final Position, etc., will be deemed valid as long as the minimum number of holes, applicable to the offer, as per the rules of the governing body (E.g. 36 holes for European Tour sanctioned events and 54 holes for PGA Tour sanctioned events), have been completed by the eligible players, and an official result has been declared by the sanctioning body. Should the format of a tournament be changed so that it features less rounds/holes than originally scheduled, all bets accepted on such offers after the last shot of the last completed round will be declared void.
- (c) Bet offers already decided are considered as valid bets even though 36 holes are not played and/or an official result has not been issued by the organisation.
- (d) Any result deriving from officially-sanctioned playoffs will count towards the settlement of Tournament offers only. Unless otherwise stated, offers referring to the performance within a specific round or hole will not take into account outcomes deriving from playoffs.
- (e) Bets on players who start the tournament, but withdraw or are disqualified, will be settled as losing bets, unless the result of the offer which the bet refers to, is already determined.
- (f) All bets placed on participants who do not compete at all will be refunded.
- (g) In outright bets which include a limited selection of participants, such as Top Nationality, Group Betting, Six-shooters, etc., Bally’s reserves the right to apply Tattersalls Rule 4 on any non-starter. Should it be the case that all players listed in the offer “miss the cut”, the player with the best position at the time “cut” was made will be deemed the winner. Dead Heat rules will

apply except for cases where a play-off has determined a better finishing position, where applicable.

- (h) All "Head to Head" bet offers require all participants to start in the event/round to which the bet refers to.
- (i) In "Head to Head" bets featuring only two players, bets will be voided if both participants share the same finishing position and no draw option has been offered. In "Head to Head" bets featuring three players, should two or more participants share the same finishing position, stakes will be divided in accordance with Section (B)(5)(s).
- (j) Settlement of "Head to Head" bet offers involving the performance of two or more players (e.g. Best Finishing Position in the tournament) will be based upon the best finishing position/lowest score (as applicable) achieved in the relative event/round which the bet refers to.
- (k) Any reference to Make/Miss the "Cut" requires an official cut/exclusion effected by the organisers for bets to stand. In the case of tournaments where players are eliminated during more than one phase, settlement will be based on a whether the player has qualified or not following the first "Cut" made.
- (l) Disqualification/withdrawals by a player before the "Cut" is made, will result in the player being considered as having missed the "Cut". Disqualification/withdrawals subsequent to the "Cut" being made will be irrelevant towards the original settlement of the "Make the Cut" offers.
- (m) In "Head to Heads" based on the best finishing position in the tournament, in case one player misses the cut then the other player will be settled as the winner. If both participants fail to make the "Cut" the player with the lowest score at the "Cut" will be considered as the winner. Should both players fail to make the "Cut" with the same score then the bet will be void. A player disqualified after the "Cut" has been made is deemed to have beaten a player who has failed to make the "Cut".
- (n) Any reference to "Majors" will be based on the tournaments for that particular season to which the PGA attributes said definition, irrespective of any venue, date, or any other changes.
- (o) Should play be stopped after a round has started and the governing body decide to cancel all action referring to that round and start from scratch or cancel altogether said round, then all bets placed after the start of that round on the Tournament outright, Leader After Round market and the Miss/Make the cut market will be void.
- (p) Bets referring to a specific participant placing within a predetermined position (example: Top 5/10/20/40) during a tournament, selection of tournaments or any particular classification will be settled as per "Dead Heat" rules should the participant tie for that particular position.

- (q) Offers related to a participant occupying a particular position on the Leaderboard at a specific time (example: Leader at End of Round X) will be settled in accordance with the result at the end of the specified round/timeframe. Dead Heat Rules will apply for any tied placings.
- (r) In tournaments where the “modified Stableford scoring” is used, bets will be settled on the points scored and not the strokes taken. Listed players must complete at least 1 hole for bets to stand, otherwise bets will be void.
- (s) Settlement of so-called “Action-betting” offers and similar, including but not limited to “Fairways/Greens in Regulation/Bunkers/Water Hazards”, are settled on the exact location where the ball is deemed to have come to rest. Bets will be settled according to the Official Website of the Tour/event involved and should no information for such settlement be published then TV pictures will be used to determine the outcome. The following description and settlement rules are being provided for “Action-betting” offers:
- Fairway in Regulation – Bet refers to a player’s tee shot on a Par 4 or Par 5 hole being deemed to have come to rest on the cut piece of grass known as the “fairway”;
  - Green in Regulation – Bet refers to a player’s approach shot being deemed to have come to rest on the cut piece of grass known as the “green” in the regulation number of strokes, which are to be understood as follows:  
*Regulation number of strokes for Par 3 holes: 1 Stroke*  
*Regulation number of strokes for Par 4 holes: 2 Strokes*  
*Regulation number of strokes for Par 5 holes: 3 Strokes*
  - Water Hazard on Hole – Bet refers to a player’s shot being deemed to have come to rest inside a Water Hazard or beyond the red boundary line of a Water Hazard and therefore within the Hazard.
  - Bunker on Hole – Bet refers to a player’s shot being deemed to have come to rest inside a Sand Bunker. Should a player require to stand within a Sand Bunker to play a shot that lay outside the Sand Bunker, this will NOT be deemed to have come to rest in a Sand Bunker.
  - Nearest the Pin in Regulation – Bet refers to the player who hits it the closest to the Pin with their regulation stroke. Ball must come to rest on the Green to count. Should all players miss the Green in Regulation, then bets will be void.  
*Regulation number of strokes for Par 3 holes: 1 Stroke*  
*Regulation number of strokes for Par 4 holes: 2 Strokes*  
*Regulation number of strokes for Par 5 holes: 3 Strokes*



- (t) "Dead heat" rules will apply on "Winner without X/named player(s) offers" should 2 or more participants share applicable positions. Bets void should the named players not take part in the competition.
- (u) For "Winning Margin" bets at least 36 holes of the tournament must be played for bets to stand.
- (v) In "Straight Forecast" offers, the selected participants must end the tournament in 1st and 2nd place in the order they have been listed. Dead-heat rules will apply in case of any ties. Both listed players must tee off at least once more after bet acceptance for bets to stand.
- (w) "Winning score" bets require all scheduled holes in the Tournament to be completed. Any reduction in number of holes will result in the voiding of the offer.
- (x) For "Hole in One during the Tournament" at least 36 holes of the tournament must be played for bets to stand unless the outcome has already been determined and in such case will be settled accordingly. For "Hole in One during Round X" the full round must be completed by all players for bets to stand unless the outcome has already been determined and in such case will be settled accordingly.
- (y) Bets referring to a specific player being the "Wire to Wire Winner" require that the listed individual is leading the Leaderboard (including any eventual ties) at the end of each and all scheduled rounds of the tournament. Any reduction in scheduled holes/rounds will render the bets void.
- (z) "Winner to Birdie/Par/Bogey the 72nd Hole" refers to the eventual winner of the Tournament's performance on their 18th Hole in Round 4. Bets void should there be any reduction in scheduled holes/rounds of the Tournament. In situations where play is by "Shotgun Start" in Round 4, bets will be made void.
- (aa) "Winner to play in the Final Round Grouping" refers to whether the eventual tournament winner will be emanating from the 2-ball or 3-ball pairings that are scheduled to tee off last as per the tee times issued by the official organization.
- (bb) Season Bets; Player to win on a stipulated tour schedule in a stipulated calendar year.
- Player must play a minimum of 10 events on that Tour for bets to stand, otherwise they will be void.
  - Individual events only will count, team events do not count.
- To finish Top 5, 10, 20 in individual or ALL majors in a stipulated calendar year. Dead Heat Rules will apply for tied positions.

#### **14. HANDBALL**

- (a) Offers referring to individual player performances in a single match (example: Total Points Scored by Player X) or confronting performances from 2 individual players during the course of a match (example: Which of Player X or Player Y will score most Points), require all listed individuals to be an active participant in the applicable match for bets to stand.
- (b) All bets referring to aggregated Tournament Totals will be settled based on official statistics by the governing body. Unless otherwise stated, cumulative amounts of such bets will include eventual prolongations (e.g. Extra Time) but not Penalty Shoot Outs.
- (c) Settlement of player related bets in a specific match will be based on the result after the end of the 2nd half (Regular Time), unless otherwise stated.
- (d) Offers referring to individual player performances' (example: Total Goals Scored by Player X during the World Cup) or confronting performances from 2 individual players over a particular period/tournament/season (example: Which of Player X or Player Y will score most goals during the Regular Season), require that all listed individuals must be an active participant in at least one more fixture applicable for the offer after bet acceptance for bets to stand.

#### **15. ICE HOCKEY**

- (a) Team/match markets which do not refer to a specific timeframe (ex. Period 1, Regular Time, etc) will also include the outcomes emanating from any eventual Overtime and Shootouts, to decide the outcome. Any team winning during Overtime/Shootouts will only be credited as having scored one goal, regardless of the number of goals scored during the eventual prolongations.
- (b) Offers referring to individual player performances in a single match (example: Total Goals Scored by Player X) or confronting performances from 2 individual players during the course of a match (example: Which of Player X or Player Y will score most Goals), require all listed individuals to be an active participant (spends time on the Ice, if not mentioned by the appropriate body, we will settle based on being in the lineup) in the applicable match for bets to stand.
- (c) Settlement of player related and team markets (such as Goals, Assists, Points, Penalty Minutes, Shots on Goal, etc.) will be settled based on official statistics by the governing body. Unless otherwise stated, settlement of such bets will include eventual prolongations (e.g. Over Time) but not Penalty Shoot Outs.
- (d) All NHL and NCAA 'match' offers will only be considered valid should there be less than 5 minutes of scheduled play left in the 3<sup>rd</sup> Period. Exception will be done for those the outcome of

which have been decided prior to the abandonment and could not possibly be changed regardless of future events, which will be settled according to the decided outcome.

- (e) Unless specifically stated or implied in the offer characteristics, settlement of Season bets will be based as per the classifications, definitions and tie-breaking rules as per the official website of the competition (as applicable).
- (f) Season bets, regardless whether these include outcomes obtained during Playoffs or otherwise, as well as offers referring to particular teams or player performances, will remain valid irrespective of eventual player trades, team movements or name changes during any point in the season.
- (g) Offers referring to individual player performances' (example: Total Goals Scored by Player X during the Playoffs) or confronting performances from 2 individual players over a particular period/tournament/season (example: Which of Player X or Player Y will score most points during the Regular Season), require that all listed individuals must be an active participant in at least one more fixture applicable for the offer after bet acceptance for bets to stand.
- (h) Player props and other stats-based offers will be settled according to the official match reports as published after the game by the governing body.

## **16. MOTORSPORT**

- (a) This section is valid for all sports related to Motor Racing, such as: Formula One, A1 GP, CART, Indy Car, Nascar, Circuit Racing, Touring Cars, DTM, Endurance, Rally, Rally-cross, Motorcycling, Superbike.
- (b) Bets are settled according to the publication of live timing and classification as shown on TV at the time of podium presentations, or at the end of the session/race/event (as applicable). Should the information required for the settling of the offer be missing/not shown and/or incomplete, the first official information on the official site will be deemed binding, regardless of subsequent promotions, demotions, appeals and/or penalties inflicted after the termination of the session/race which the bet refers to.
- (c) Events being shortened due to weather conditions or other situations but are deemed official by the governing body will be settled accordingly, regardless of any changes which said associations might make due to the incompleteness of the race.
- (d) Should an event/race/session/lap/heat be restarted from the beginning, bets will stand and will be settled according to the result issued after the restart, except for those bets the outcome of which has already been determined.

- (e) For settlement purposes, a driver/rider who has taken part in an officially-sanctioned practice or qualification session is considered to have taken part in the event, regardless of his eventual participation in the actual race.
- (f) In "Head to Head" bets all listed participants must take part in the session to which the bet refers to for bets to stand, irrespective of whether a driver manages to get an official time.
- (g) In "Outright" or "Place" bets, no refunds will apply on those participants who do not take part for any reason, for the session/event/championship to which the offer refers to.
- (h) Settlement for any offer with reference to "Race completion" will be based on official regulations as issued by the governing body.
- (i) A "Head to Head" bet where both drivers/riders fail to complete the race is determined on the basis of the most laps completed. In case the participants fail to complete the race and are recorded for the same number of laps, the bet is declared void, except in cases of Rally where at least one of the listed participants must complete the event, otherwise the bets will be declared void.
- (j) Time penalties inflicted by the governing body during the qualifying session(s) will count. Other grid demotions/promotions are disregarded.
- (k) A Race is considered to have started when the warm-up lap starts (where applicable), thus all drivers/riders taking part in the warm-up lap are deemed to have started. In case of a participant whose start is delayed, or starts the race from the pit lane, the participant is also deemed to have taken part.
- (l) Settlement of seasonal markets will take into account the classification issued exactly after the completion of the last race of the season including any decisions taken by the organizing body during the season, given that said decision is issued before the last race of the season. Any decision (even on appeal) taken after the end of the last stipulated race is deemed as irrelevant.
- (m) All bets which make reference to teams' performances will stand regardless of any driver/rider changes.
- (n) Bets will stand regardless of any schedule/location/circuit changes as far as the race/event is held within the same year/season, irrespective of any time delays, calendar order, etc., except for those bets placed after 00:00CET of the Monday of the week for which the race/event is scheduled which will be refunded should the race/event/session that the offer refers to not be held within 7 days of the scheduled date at the time the bet was placed.

- (o) Bets referring to specific teams' performance during the race require the initially stipulated number of vehicles from each team to start the race for bets to stand, otherwise they will be declared void (e.g. in Formula 1, two cars from each team should start the race).
- (p) Settlement of bets referring to the inclusion of the "Safety Car" will not take into account those occurrences in which the actual race starts behind the "Safety Car".
- (q) Settlement of offers on the first driver/car to retire will be based on the actual lap in which the driver is considered to have withdrawn from the race. Thus if two or more drivers retire during the same lap bets will be settled in accordance with Section (B)(5)(n).
- (r) Bets on the First/Next Driver to retire during the race will include only the outcomes deriving after the official start of the race. Any retirements/withdrawals previous to the actual start of the GP (including those during the warm-up lap) will not be considered for settlement purposes.

#### **17. RUGBY LEAGUE**

- (a) Unless otherwise stated, settlement of bets on Rugby League is determined on the basis of the result after the so called extra (over) time or Golden Point Rule, as applicable.
- (b) "Margin Betting" and "Half/Time Full Time" offers are settled with the outcome at the end of the 80 minutes play.
- (c) Certain competitions/events might have offers that are relevant to a specific period/match that can end in a draw, either at the end of the normal 80 minutes of play or even after eventual extra (over) time is played. In such cases bets are settled according to the so-called "dead-heat" rule where the payout would be calculated after the odds are divided and then multiplied by the stake, irrespective of whether the net payout is lower than the Account Holder's stake.
- (d) Try Scorers (First/Last/Anytime/Team) – All bets include any potential extra (over) time. Any bets placed on players in the game day 17 stand regardless of the player's participation (or lack thereof) in the match. Stakes on players not included in game day 17 will be refunded.
- (e) Unless otherwise specified, offers referring to individual player performances in a single match (example: Total Tries Scored by Player X) or confronting performances from 2 individual players during the course of a match (example: Which of Player X or Player Y will score most Tries), require all listed individuals to play from the start of the applicable match for bets to stand.
- (f) Offers referring to individual player performances' (example: Total Tries Scored by Player X during the World Cup) or confronting performances from 2 individual players over a particular period/tournament/season (example: Which of Player X or Player Y will score most tries during

the Regular Season), require that all listed individuals must be an active participant in at least one more fixture applicable for the offer after bet acceptance for bets to stand. Bets placed after any news which can even potentially reduce the number of fixtures any listed player is eligible for within the competition (example: injury/transfer/trade news); thus altering the odds even just theoretically in favour of any particular outcome without said odds having been adjusted to reflect the current state of the bet, will be declared void. Settlement of similar bets will be based on the result after potential over (extra) time, unless otherwise stated.

(g) All bets stand, regardless of change of venue.

## **18. RUGBY UNION**

- (a) Unless otherwise specified all bets referring to the match and team performances, etc. are settled in accordance with the result at the end of the 2nd half (after 80 minutes play).
- (b) Certain competitions/events might have offers that are relevant to a specific period/match that can end in a draw, either at the end of the normal 80 minutes of play or even after eventual extra (over) time is played. In such cases bets are settled according to the so-called “dead-heat” rule where the payout would be calculated after the odds are divided and then multiplied by the stake, irrespective of whether the net payout is lower than the Account Holder's stake..
- (c) Try Scorers (First/Last/Anytime/Team) – All bets include any potential extra (over) time. Any bets placed on players in the match day squad stand regardless of the player’s participation (or lack thereof) in the match. Stakes on players not included in the match day squad will be refunded. Penalty Tries will be settled on the “penalty try” outcome listed for each team. In the event of no try scored in the match no bets shall be refunded.
- (d) Unless otherwise specified, offers referring to individual player performances' in a single match (example: Total Tries Scored by Player X) or confronting performances from 2 individual players during the course of a match (example: Which of Player X or Player Y will score most Tries), require all listed individuals to play from the start of the applicable match for bets to stand.
- (e) Offers referring to individual player performances' (example: Total Tries Scored by Player X during the World Cup) or confronting performances from 2 individual players over a particular period/tournament/season (example: Which of Player X or Player Y will score most tries during the Regular Season), require that all listed individuals must be an active participant in at least one more fixture applicable for the offer after bet acceptance for bets to stand. Settlement of similar bets will be based on the result after potential over (extra) time, unless otherwise stated.
- (f) All bets stand, regardless of change of venue.

## 19. LACROSSE

- (a) A two point goal counts as two goals.
- (b) "Total Goals" Refers to the Sum of the Final Score.
- (c) For player props, "Total Goals Scored by the Player" = Points - Assists.
- (d) No refunds on odds to win.
- (e) All games must go the full 60 minutes for bets to be valid.
- (f) Overtime is included for wagering purposes if there is no draw line.

## 20. TENNIS

- (a) All bets will remain valid as far as the match/offer is played within the tournament framework regardless of any changes (either before or during the match), in conditions (indoor/outdoor) and/or surface types, unless other arrangements have been agreed.
- (b) "Match" bet offers are based on the general principle of tournament progress or tournament win, depending on which phase of the competition the match refers to. The player/team progressing to the next round or winning the tournament is to be considered as the winner of the bet regardless of withdrawals, disqualifications, etc. These bets require at least one set to be completed for bets to stand.
- (c) "Over/Under" and "Handicap" offers on unfinished matches the outcome of which is already determined before the interruption of play and/or where any further continuance of play could not possibly produce a different outcome to said offers, will be settled based on the result achieved until the interruption. For the calculation of these settlements, the minimum amount of occurrences which should have been needed to bring the offer to the natural conclusion will be added as necessary depending on the number of sets which the match is scheduled for. Should this calculation produce a situation where no possible alterations could affect the outcome of the offer this will be settled as such. The following examples can be used for consideration:

Example 1 - Over/Under: A retirement occurs in a match scheduled for three sets with the score 7-6, 4-4. The offers: "Total Games Set 2 – 9.5" (or any lines lower than that amount) & "Total Games Played in the Match – 22.5" (or any lines lower than that amount) will be settled with "Over" bets as winning and "Under" bets as losing. Bets on lines higher than that will be settled as void.

Example 2 - Handicap: A retirement occurs at the start of the 3<sup>rd</sup> set in a match scheduled for 5 sets with the score at 1-1. Bets on +2.5/-2.5 Sets will be settled as winners and losers respectively. Offers on any lines lower than that amount will be settled as void.

- (d) All "Correct Score" (namely Set Betting and Game Betting), "Odd/Even", and those offers which refer to the winner of a particular period in the match (example "Which player will win the first set?" and "Set 2 – Game 6: Winner" require the relevant part of the match to be completed.
- (e) All type of offers not specified above require at least one set to be completed for bets to stand, except for those offers the outcome of which is already determined before the interruption of play and any further continuation of play could not possibly produce a different outcome.
- (f) In a Doubles match, all bets will be declared void if any of the stated players are being replaced.
- (g) Any reference to "Grand Slams" will be based on the tournaments for that particular season to which the ITF attributes said definition, irrespective of any venue, date, or any other changes.
- (h) Bets on doubles matches in the Round Robin stages of the Davis Cup Finals, Billie Jean King Cup Finals and ATP Cup will always stand, even if the score in the tie is 2-0. For all other Davis Cup, ATP Cup and Billie Jean King Cup ties, the doubles matches will be void, if the tie has already been decided.
- (i) Results acquired in a "Pro Set" will be valid only for the following offers: "Match", "Set Handicap", "Set Betting" and "Total Sets". All other types of offers will be settled as void, with the exception of offers the outcome of which is already determined.  
Should a match be played in a format/number of sets different than that presumed at time the market was published, Bally's will void the applicable markets pertaining to X, Y, Z unless the necessary number of occurrences has already been achieved regardless of the change in format/number of sets.
- (j) As a general rule "tie-breaks" are always considered as 1 game only, regardless of the number of points needed to win or whatever the format of the "tie-break". The following tie-break scenarios will be settled as follows:
  - "Match tie-break": Normally played instead of the decisive set when both participants have won the same number of sets. For settlement purposes, this is considered as a full set as well as a game and counted accordingly. However, it will not be considered as a tie-break for the settlement of the relevant offers;
  - "Tiebreak at 6-6 in a set, first to 7 points": For settlement purposes, this is considered to be 1 game and counted accordingly as well as a tie-break for the settlement of the relevant offers;
  - "Tiebreak at 6-6 in a set, first to 10 points": For settlement purposes, this is considered to be 1 game and counted accordingly as well as a tie-break for the settlement of the relevant offers;



- "Tiebreak at 12-12 in a set, first to 7 points": For settlement purposes, this is considered to be 1 game and counted accordingly as well as a tie-break for the settlement of the relevant offers;
- "Tiebreak at 3-3 in a set, first to 7 points" (aka Fast 4 format): For settlement purposes, this is considered to be 1 game and counted accordingly as well as a tie-break for the settlement of the relevant offers;
- "Tiebreak Tens": A match which consists solely of a tie-break with the winning participant being the one to first reach 10 points and lead by a margin of 2. This is considered both as a tie-break and as a full match for the settlement of the relevant offers.

Should any match include a tie-break format not listed above, offers will be settled according to the definitions as described by the ITF, or in absentia, the closest in principle to the examples listed above.

- (k) Win/Place and Each-Way bets referring to the Tournament Winner placed between the time of the first publication of the main draw by the governing body and the start of the competition, will be refunded should the listed participant not take any further part in the Tournament. Exception will be done for any participants still involved in the Qualifying stages as these will be considered as active participants.
- (l) Bets on season related performances (e.g. "number of Grand Slam titles won" or "to finish top 20 yes/no" will be void if the player does not play at least 5 ranking point awarding events during the season.

## **21. NETBALL**

- (a) Unless otherwise stated, settlement of bets on will be determined on the basis of the result after the so called extra (over) time.
- (b) "Margin Betting" and "Half/Time Full Time" offers are settled with the outcome at the end of the 80 minutes play.
- (c) A match has to be completed for bets to stand, except for those offers the outcome of which has been decided prior to the abandonment and could not possibly be changed regardless of future events, which will be settled according to the decided outcome.
- (d) Offers referring to individual player performances in a single match (example: Total Points Scored by Player X) or confronting performances from 2 individual players during the course of a match (example: Which of Player X or Player Y will score most points), require all listed individuals to participate in at least one more play in the match, after bet acceptance, for bets to stand.
- (e) Offers referring to individual player performances over a particular period (example: Total Points Scored by Player X during the Regular Season) or confronting performances from 2 individual

players during the course of the season (example: Which of Player X or Player Y will score most Points during the Regular Season), require all listed individuals to be an active participant in at least one more match applicable for the offer after bet acceptance for bets to stand.

## **22. VOLLEYBALL**

- (a) Any points tallied during the so called "Golden Set" will not count for the settlement of the offers relating to that particular match, with the exception of any bets referring to tournament progression and Tournament Totals.
- (b) Offers referring to individual player performances' in a single match (example: Total Points Scored by Player X) or confronting performances from 2 individual players during the course of a match (example: Which of Player X or Player Y will score most Points), require all listed individuals to be an active participant in the applicable match for bets to stand.
- (c) "Over/Under" and "Handicap" offers on unfinished matches the outcome of which is already determined before the interruption of play and/or where any further continuance of play could not possibly produce a different outcome to said offers, will be settled based on the result achieved until the interruption. For the calculation of these settlements, the minimum amount of occurrences which should have been needed to bring the offer to the natural conclusion will be added as necessary depending on the number of sets which the match is scheduled for. Should this calculation produce a situation where no possible alterations could affect the outcome of the offer, this will be settled as such. See examples from the tennis-section for reference.
- (d) All "Correct Score" offers, "Odd/Even", and those offers which refer to the winner of particular period/timeframe in the match (example "Which team will win the 1st set?" and "Set 2 – Race to 15 points" require the relevant part of the match to be completed.
- (e) All type of offers not specified above require at least one set to be completed for bets to stand, except for those offers the outcome of which is already determined before the interruption of play and any further continuation of play could not possibly produce a different outcome.
- (f) Offers referring to individual player performances' (example: Total Points Scored by Player X during the World Championship) or confronting performances from 2 individual players over a particular period/tournament/season (example: Which of Player X or Player Y will score most points during the Regular Season), require that all listed individuals must be an active participant in at least one more fixture applicable for the offer after bet acceptance for bets to stand.

## **23. PESÄPALLO (FINNISH BASEBALL)**

- (a) All bets on Pesäpallo are determined on the basis of the result after the first two rounds (innings). Unless otherwise stated, any scores deriving from prolongation periods (e.g. Supervuoropari) are not taken into consideration.

#### **24. SPEEDWAY**

- (a) All offers will be settled based on the official result declared by the governing body at the completion of the last scheduled heat. Subsequent promotions, demotions, appeals and/or penalties inflicted after the termination of the event which the bet refers to are disregarded.
- (b) "Match" bets between two teams/riders are settled according to the official result, regardless of the number of heats completed.
- (c) "Over/Under" offers on unfinished matches/events the outcome of which is already determined before the interruption and/or any further continuance of play could not possibly produce a different outcome to said offers, will be settled based on the result achieved until the interruption. For the calculation of these settlements, the minimum amount of occurrences which should have been needed to bring the offer to the natural conclusion, will be added as necessary depending on the number of sets which the match is scheduled for. Should this calculation produce a situation where no possible alterations could affect the outcome of the offer this will be settled as such. See examples from the tennis-section for reference.
- (d) "Handicap" offers require all scheduled heats to be completed for bets to stand except in those events the outcome of which is already determined before the interruption and/or any further continuance of play could not possibly produce a different outcome to said offers which will be settled accordingly. See examples from the tennis-section for reference.
- (e) All "Head to Head" and "Over/Under" bets featuring the performance of one or more riders in an event/heat are considered valid given that all listed riders take part in at least one heat for bets to stand.
- (f) Bets referring to a specific heat require the specific heat to be completed and all listed participants to take part in the particular heat for bets to stand.

#### **25. SWIMMING**

- (a) Unless otherwise stated, all bets on Swimming are determined on the basis of the result after the final stage of that competition. If neither of the listed participants takes part in the final stage, all bets will be void, unless the governing body follows specific tie-breaking procedures, in which case, these will be deemed valid.

- (b) All bet offers will be settled based on the first official result being presented. However, [the Operator] will settle/re-settle accordingly, any changes to the official result issued within 24 hours after the event has taken place. For such eventuality to be considered, the protest must be attributable to incidents happening exclusively during the event, such as a lane infringement or an early start in a relay race, etc. No doping cases will be considered. The result available at the end of the aforementioned 24 hours will be deemed as binding regardless of any further protests, changes to the official result, etc.
- (c) If two or more participants take part in different heats during a competition, all Head-To-Head offers between them will be considered void, unless there is a later stage in the competition that at least one of them qualifies for.
- (d) A participant who is disqualified due to the infringement of the start procedure (false start) will be deemed to have taken part in the event.

## **26. TENNIS AND RACKET SPORS (BADMINTON, & TABLE TENNIS)**

- (a) All bets will remain valid as far as the match/offer is played within the tournament framework regardless of any changes (either before or during the match), in conditions (indoor/outdoor) and/or surface types, unless other arrangements have been agreed.
- (b) "Match" bet offers are based on the general principle of tournament progress or tournament win, depending on which phase of the competition the match refers to. The player/team progressing to the next round or winning the tournament is to be considered as the winner of the bet regardless of withdrawals, disqualifications, etc. These bets require at least one set to be completed for bets to stand.
- (c) "Over/Under" and "Handicap" offers on unfinished matches the outcome of which is already determined before the interruption of play and/or where any further continuance of play could not possibly produce a different outcome to said offers, will be settled based on the result achieved until the interruption. For the calculation of these settlements, the minimum amount of occurrences which should have been needed to bring the offer to the natural conclusion will be added as necessary depending on the number of sets which the match is scheduled for. Should this calculation produce a situation where no possible alterations could affect the outcome of the offer this will be settled as such. The following examples can be used for consideration:
  - (s) Example 1 - Over/Under: A retirement occurs in a match scheduled for three sets with the score 7-6, 4-4. The offers: "Total Games Set 2 – 9.5" (or any lines lower than that amount) & "Total Games Played in the Match – 22.5" (or any lines lower than that amount) will be settled with "Over" bets as winning and "Under" bets as losing. Bets on lines higher than that will be settled as void.

- (t) Example 2 - Handicap: A retirement occurs at the start of the 3<sup>rd</sup> set in a match scheduled for 5 sets with the score at 1-1. Bets on +2.5/-2.5 Sets will be settled as winners and losers respectively. Offers on any lines lower than that amount will be settled as void.
- (d) All "Correct Score" (namely Set Betting and Game Betting), "Odd/Even", and those offers which refer to the winner of a particular period in the match (example "Which player will win the first set?" and "Set 2 – Game 6: Winner" require the relevant part of the match to be completed.
- (e) All type of offers not specified above require at least one set to be completed for bets to stand, except for those offers the outcome of which is already determined before the interruption of play and any further continuation of play could not possibly produce a different outcome.
- (f) In a Doubles match, all bets will be declared void if any of the stated players are being replaced.
- (g) Any reference to "Grand Slams" will be based on the tournaments for that particular season to which the ITF attributes said definition, irrespective of any venue, date, or any other changes.
- (h) Bets on doubles matches in the Round Robin stages of the Davis Cup Finals, Billie Jean King Cup Finals and ATP Cup will always stand, even if the score in the tie is 2-0. For all other Davis Cup, ATP Cup and Billie Jean King Cup ties, the doubles matches will be void, if the tie has already been decided.
- (i) Results acquired in a "Pro Set" will be valid only for the following offers: "Match", "Set Handicap", "Set Betting" and "Total Sets". All other types of offers will be settled as void, with the exception of offers the outcome of which is already determined.  
Should a match be played in a format/number of sets different than that presumed at time the market was published, [the Operator] will void the applicable markets pertaining to X, Y, Z unless the necessary number of occurrences has already been achieved regardless of the change in format/number of sets.
- (j) As a general rule "tie-breaks" are always considered as 1 game only, regardless of the number of points needed to win or whatever the format of the "tie-break". The following tie-break scenarios will be settled as follows:
- "Match tie-break": Normally played instead of the decisive set when both participants have won the same number of sets. For settlement purposes, this is considered as a full set as well as a game and counted accordingly. However, it will not be considered as a tie-break for the settlement of the relevant offers;
  - "Tiebreak at 6-6 in a set, first to 7 points": For settlement purposes, this is considered to be 1 game and counted accordingly as well as a tie-break for the settlement of the relevant offers;

- "Tiebreak at 6-6 in a set, first to 10 points": For settlement purposes, this is considered to be 1 game and counted accordingly as well as a tie-break for the settlement of the relevant offers;
- "Tiebreak at 12-12 in a set, first to 7 points": For settlement purposes, this is considered to be 1 game and counted accordingly as well as a tie-break for the settlement of the relevant offers;
- "Tiebreak at 3-3 in a set, first to 7 points" (aka Fast 4 format): For settlement purposes, this is considered to be 1 game and counted accordingly as well as a tie-break for the settlement of the relevant offers;
- "Tiebreak Tens": A match which consists solely of a tie-break with the winning participant being the one to first reach 10 points and lead by a margin of 2. This is considered both as a tie-break and as a full match for the settlement of the relevant offers.

Should any match include a tie-break format not listed above, offers will be settled according to the definitions as described by the ITF, or in absentia, the closest in principle to the examples listed above.

- (k) Win/Place and Each-Way bets referring to the Tournament Winner placed between the time of the first publication of the main draw by the governing body and the start of the competition, will be refunded should the listed participant not take any further part in the Tournament. Exception will be done for any participants still involved in the Qualifying stages as these will be considered as active participants.
- (l) Bets on season related performances (e.g. "number of Grand Slam titles won" or "to finish top 20 yes/no" will be void if the player does not play at least 5 ranking point awarding events during the season.

## **27. WINTER SPORTS**

- (a) This section is valid for the following sports: Alpine Skiing, Biathlon, Cross Country Skiing, Freestyle, Nordic Combined, Short Track, Ski Jumping, Snowboard & Speed Skating.
- (b) Results from a competition will be deemed valid if it is declared as a valid competition for the relevant category, by the governing body for that sport. This applies in case of an event being shortened, such as only consisting of one run/jump instead of two, or an event being moved to another venue.
- (c) In cases of abandoned/uncompleted events, all those offers the outcome of which is already determined before the interruption of play and any further continuation of play could not possibly produce a different outcome are deemed valid and will be settled accordingly.

- (d) All offers will be settled as void if the original/stated format of an event is completely changed, like the size of hill in Ski Jumping, style in Course Country Skiing, etc.
- (e) [the Operator] reserves the right to apply Tattersalls Rule 4 in case of a non-starter in a "Group Betting" ("Best of X") offer.
- (f) Offers related to specific Winter Sports events (excluding for example bets referring to Overall classifications, Olympic, World and Continental competitions), are offered with the explicit assumption that the particular event will be the next event held in that particular sports/discipline. Should the specific event be moved for any reason whatsoever and an exactly similar event for that sports/discipline is held in the same location starting in not more than 72 hours, the bets will be valid for the next scheduled event in that sports/discipline. Thus, if for example two separate races from the same sports/discipline are scheduled for Friday and Saturday and the Friday competition is moved to Saturday or Sunday, the bets on the Friday competition will be settled in accordance with the next scheduled event, in this case Saturday's events. In cases where just 1 event is scheduled in that sports/discipline and the starting time is moved less than 72 hours, bets will remain valid and will be settled accordingly. Should no event with the same connotations be held in the 72 hour period after the initially scheduled time, bets will be settled as void.
- (g) In a "Head to Head" between two or three participants, at least one of the listed participants must complete the final run/stage/jump which the bet refers to, for bets to be considered valid. Such provision is not applicable for Cross-country Sprint events which include different elimination stages as well as Ski Jumping. In such cases, settlement will be based on the official classification irrespective of whether any of the listed participants completes the final run/stage/jump.
- (h) All bet offers will be settled based on the first official result being presented. However, [the Operator] will take into account and settle/re-settle accordingly, following any changes to the official result issued within 24 hours after the event has taken place. For such eventuality to be considered, the protest must be attributable to incidents happening exclusively during the event, such as a line infringement, pushes or a false handover in a relay race, etc. No doping cases will be considered. The result available at the end of the aforementioned 24 hours will be deemed as binding regardless of any further protests, changes to the official result, etc

## **28. MIXED MARTIAL ARTS**

- (a) All offers will be settled according to the official result of the relevant governing body immediately as declared by the ring announcer at the end of the fight. No amendments made to the official result after being first announced will be taken into consideration except for those which the official organization effects to rectify clear cases of human errors by the ring announcer.

- (b) Unless clearly specified that the fights are unconfirmed, bets are only valid should the fight take place on the card/date it was announced for irrespective of any change in venue/location. Bets will be settled as void should there be any official announcement by the organizing body of a date postponement, re-scheduling to a different card or change in fighters even if said match ends up taking place as originally announced.
- (c) The addition or removal of title stipulations (example: a match initially announced as a non-title match gets changed into a title match) or changes in weight classes as well as either/both of the fighters fail to make the pre-established weight, will not result in the voiding of the offers as much as the fight takes place on the card it was announced for.
- (d) If for any reason, the number of scheduled rounds in a fight is changed between the time of bet acceptance and the actual fight, offers which make specific reference to rounds, such as "Round betting", "Group of Rounds", "Over/Under", "Winning Method" and "To go the distance", or other offers which would be affected by such change, will be declared void.
- (e) For settlement purposes, in case the fight is interrupted for any reason in between rounds, e.g. retirement before the start of a round, disqualification, failure to answer the bell, the fight will be deemed to have finished at the end of the previous round.
- (f) Offers on fights declared as a "No Contest" or where neither fighter is declared as the only winner of the fight, will be settled as void, except in cases where such outcome was offered for betting purposes or for those offers the outcome of which has been decided prior to the decision and could not possibly be changed regardless of future events, which will be settled according to the decided outcome.
- (g) The following descriptions are to be considered as the applicable outcomes for the different scenarios:
- "Finish": A win by KO (Knockout), TKO (Technical Knockout), DQ (Disqualification), Submission, 'throwing of the towel' from either fighter's corner, any referee stoppage which declares either fighter as the only winner of the fight;
  - "Points/Decision": Any win based on the judges' scorecards;
  - "Unanimous decision": A decision where all judges declare the same fighter as the winner;
  - "Majority decision": A decision where the majority of judges declare the same fighter as the winner while the minority of the judges declare the fight as a draw;
  - "Split decision": A decision where the majority of judges declare a particular fighter as the winner while the minority of the judges declare the other fighter as the winner;
  - "Majority draw": A decision where the majority of judges declare the fight as a draw while the minority of the judges declare a particular fighter as the winner;



- “Split draw”: A decision where each of the judges’ scorecards declare a different outcome of the fight and no outcome prevails over the other.
- (h) A fight will only be considered as having gone "the distance" only if a points/judges’ decision is awarded after the full duration of all scheduled rounds has been completed. If a judges or referees’ decision is awarded, before the full number of scheduled rounds are completed (Technical Decision or No Contest) offers such as “Alternate Round Betting”, “Group of rounds” and “Over/under” will be declared void, unless the outcome is already determined. For settlement purposes, betting on rounds or groups of rounds is for a fighter to win by KO, TKO, disqualification or submission during that round/group of rounds. In the event of a Technical Decision before the end of the fight, all bets will be settled as a “Win by Decision”.
- (i) In offers where a draw/tie is possible and odds have not been offered for such outcome, bets will be settled as void should the official result be declared as such. For settlement purposes, fights the outcome of which is declared as either a “Majority draw” or a “Split draw” are to be considered as a drawn/tied outcome and offers will be settled accordingly.
- (j) Bets referring to round/fight duration represents the actual time passed in the round/fight, as applicable, depending on the scheduled round/fight duration. For example, a bet on Over 4.5 Total Rounds will be settled as Over once two minutes and 30 seconds in the 5th Round has passed.
- (k) Settlement of statistics-based offers such as "Fighter to have most takedowns" or "Fighter to have most significant strikes" will be settled based on the results issued by the governing body or its recognized official partner for such statistics. Settlement will be based according to the definition with which the official governing body issues said statistics. In cases where both fighters are declared as having accomplished the same result and said outcome not having been available as a possible outcome for betting purposes, bets will be voided.
- (l) Markets which confront or tally different fights from the same card such as “Total KOs/TKOs on the card” or “Total matches to end by decision on the card” will indicate the number of fights required to take place on a card, or list specifically the section of the card the bet relates to. Bets will remain valid should any applicable fight be cancelled yet the number of fights on the card or the applicable specific section of it remain the same (example: re-booking, replacement fighter or undercard/preliminary matches being pushed to the main card). Should for whatever reason the listed number of fights not take place during the card or the specific section of it for which the bet refers to, bets will be settled as void.

## 29. SNOOKER

- (a) All bets will remain valid as far as the match/offer is played within the tournament framework regardless of any changes in schedule, etc.
- (b) "Match" bet offers are based on the general principle of tournament progress or tournament win, depending on which phase of the competition the match refers to. The player progressing to the next round or winning the tournament is to be considered the winner of the bet regardless of match duration, withdrawals, disqualifications, etc. These bets require at least one frame to be completed for bets to stand.
- (c) "Over/Under" offers on unfinished matches/events the outcome of which is already determined before the interruption and/or any further continuance of play could not possibly produce a different outcome to said offers, will be settled based on the result achieved until the interruption has occurred. For the calculation of these settlements, the minimum amount of occurrences which should have been needed to bring the offer to the natural conclusion will be added as necessary depending on the number of frames which the match is scheduled for. Should this calculation produce a situation where no possible alterations could affect the outcome of the offer this will be settled as such. See examples from the Tennis section for reference.
- (d) "Handicap" offers require all scheduled frames to be completed for bets to stand except in those events the outcome of which is already determined before the interruption and/or any further continuance of play could not possibly produce a different outcome to said offers which will be settled accordingly. See examples from the Tennis section for reference.
- (e) All "Correct Score", "Odd/Even" and those offers which refer to the winner of a particular period in the match (example "E.g. Player to win the first set" or "First Player to reach X Frames") require the relevant part of the match to be completed.
- (f) All types of offers not specified above require at least one frame to be completed for bets to stand, except for those offers the outcome of which is already determined before the interruption of play and any further continuation of play could not possibly produce a different outcome.
- (g) In cases of a re-rack all bets on that specific frame will be settled as void and a new market will be opened. An exception will be done for those offers the outcome of which is already determined before the re-rack and any further continuation of play could not possibly produce a different outcome.

- (h) All offers that refer to a “{x}+break” will be settled as yes on occurrences of the break of {x} or more inclusive. For example, the offer “100+ Break in Frame 1” will be settled as yes, if there is exactly a 100 break in frame 1.

### **30. DARTS**

- (a) All bets will remain valid as far as the match/offer is played within the tournament framework regardless of any changes in schedule, etc.
- (b) “Match” bet offers are based on the general principle of tournament progress or tournament win, depending on which phase of the competition the match refers to. The player progressing to the next round or winning the tournament is to be considered the winner of the bet regardless of match duration, withdrawals, disqualifications, etc, granted that the match actually starts.
- (c) “Over/Under” offers on unfinished matches/events the outcome of which is already determined before the interruption and/or any further continuance of play could not possibly produce a different outcome to said offers, will be settled based on the result achieved until the interruption. For the calculation of these settlements, the minimum amount of occurrences which should have been needed to bring the offer to the natural conclusion will be added as necessary depending on the number of legs which the match is scheduled for. Should this calculation produce a situation where no possible alterations could affect the outcome of the offer this will be settled as such. See examples from the Tennis section for reference.
- (d) “Handicap” offers require all scheduled sets to be completed for bets to stand except in those events the outcome of which is already determined before the interruption and/or any further continuance of play could not possibly produce a different outcome to said offers which will be settled accordingly. See examples from the Tennis section for reference.
- (e) All “Correct Score”, “Odd/Even” and those offers which refer to the winner of a particular period in the match (example “E.g. Player to win the first set” or “First Player to reach X Sets”) require the relevant part of the match to be completed.

- (f) All types of offers not specified above require at least one set to be completed for bets to stand, except for those offers the outcome of which is already determined before the interruption of play and any further continuation of play could not possibly produce a different outcome.
  
- (g) Offers combining a number of occurrences by a specific player within a match/event (example: King of the Oche, etc), require that all connotations related to the offer bet must be fully and unquestionably complied with. Should 1 or more parts of the offer end in a tie bets will be settled as LOST.
  
- (h) All offers that refer to a "{x}+checkout" will be settled as yes on occurrences of the checkout of {x} or more inclusive. For example, the offer "100+Checkout – Leg 1" will be settled as yes, if there is exactly a 100 checkout in Leg 1

To: Interim Chair Jordan Maynard  
Commissioner Bradford R. Hill  
Commissioner Eileen M. O'Brien  
Commissioner Nakisha L. Skinner

From: Justin Stempeck, Deputy General Counsel

Re: Tomorrow's Golf League - Esports

Date: June 10, 2024

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Previously the Commission heard from the Sports Wagering Division concerning a proposal on wagering on "Tomorrow's Golf League" ("TGL"), a league that combines hitting into a sophisticated screen for longer shots and putting on a green that can be modified into different configurations. During this discussion the Commission queried whether this type of activity would qualify as "Esports" and whether it would need any type of special approval.

From our review of the governing statute and regulations, TGL would not fit into the traditional definition or understanding of Esports and instead appears to be a unique hybrid category combining elements of traditional golf with highly technical equipment unlike other traditional sports.

Under G.L. c. 23N, § 3, a "sporting event" is defined as:

a professional sport or athletic event, collegiate sport or athletic event, a collegiate tournament, motor race event, **electronic sports event or other event authorized by the commission** under this chapter; provided, however, that "sporting event" shall not include: (i) high school and youth sports or athletic events; or (ii) a collegiate sport or athletic event involving 1 or more collegiate teams from the commonwealth unless they are involved in a collegiate tournament. (emphasis added)

G.L. c. 23N also defines "Electronic Sports" as a "single or multiplayer **video game** played competitively for spectators." Notably, G.L. c. 23N does not define the term "video game," but generally video games are understood to be played using controllers (or keyboard/mouse) through gaming consoles or computers and Esports competitions in other jurisdictions have consisted of tournaments involving the playing of specific video game titles such as Dota 2, Fortnite, Counterstrike, and League of Legends. None of these titles involve the actual physical play component described in the TGL proposal.

Given the differences between the activity proposed in the TGL league and the industry understanding of "esports," we would recommend that if the Commission was interested in approving this event that it could do so under the "other event" category of the "sporting event" definition cited above.

We have reviewed the regulations and statutes of the other jurisdictions where TGL has been approved (AZ, CO, IL, KS, LA, MD, OR, PA, TN and PR) as a golfing event and those jurisdictions largely have similar definitions of esports as Massachusetts (or no specific

definition of esports at all).<sup>1</sup> It is worth noting that several of these jurisdictions have express definitions for esports and yet still approved TGL as a “golfing event.”

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<sup>1</sup> In Arizona an “e-sport” is defined as “an organized multiplayer video game competition....” Ariz Rev. Stat. Ann. § 5-1301.

Colorado law does not specifically define esports, but the Colorado Gaming Division prohibits video game competitions that are not “sanctioned by a sports governing body as an electronic competition,” and has proactively permitted wagers on various popular video game titles.

Illinois does not define esports in its statute or regulations, but the Illinois Gaming Control Board is empowered to authorize wagering on events of “relative skill” beyond traditional athletic events. See 230 Ill. Comp. Stat. Ann. 45/25-10.

Kansas takes a similar approach to Illinois, with no express definition of esports and defining “sporting event” broadly to include “any other special event authorized by the commission.” Kan. Stat. Ann. § 74-8702.

Louisiana’s definition of “sports event” includes “any competitive video game or other electronic sports event.” LA Revised Statutes 27:602(22).

Maryland’s definition of “sporting event” includes “an electronic sports or video game competition in which each participant is at least 18 years old.” Md. Code Ann., State Gov’t § 9-1E-01.

Oregon regulations define a “sporting event” as “a game, match, race, or similar competitive event associated with a governing body in its entirety or a particular event or occurrence within or related to the game, match, race, or similar competitive event such as, but not limited to, a particular play or score.” Or. Admin. R. 177-093-0005.

Pennsylvania regulations contain no reference to esports and would appear to prohibit their approval outright as the definition of sporting event states “a professional or collegiate sports or athletic event or a motor race event, including international team and international individual athletic events.” 58 PA Code § 1401a.2.

Tennessee law specifically defines esports as “any multiplayer video game played competitively for spectators, either in-person or via remote connection, in which success principally depends upon the superior knowledge, training, experience, and adroitness of the players.” Tenn. Code Ann. § 4-49-102(9).

Puerto Rico has perhaps the most detailed authorization of esports, noting in its regulations the following:

In addition, wagering on electronic game leagues such as E-Sports is authorized.

- 1) E-sports are organized video game competition events in which individual competitors from different leagues or teams compete against each other in popular games in the video game industry.
- 2) E-sports include the following types of games:
  - a. Real-time strategy
  - b. Fighting
  - c. Shooting or First-Person Shooter (FPS)
  - d. Multiplayer Online Battle Arena (MOBA)
- 3) Electronic sports games (such as soccer, basketball, tennis, hockey, volleyball, etc.) are permitted within E-sports competitions. Additionally, different products within the electronic sports category can be used, such as FIFA, PES, Motorsports, NBA2K, etc.
- 4) E-Sports Betting has the players bet on the result of the event or on determined incidents that occur in electronic sports competitions or in videogame competitions.
- 5) These competitions range from two-person match-up to team competitions.

While TGL does rely on significant technological determinations made by the interactive screen involved in calculating initial ball location from tee off, this factor does not make TGL an “esport.” This heavy reliance on technology may raise other questions concerning the system integrity of the software and hardware responsible for these calculations, particularly where they have a critical impact on determining results of wagers. Many other sports do have a technological component, but TGL as a league would not exist without the technology contained in the hitting screen. For this and the other reasons discussed above we would recommend that if the Commission were inclined to approve TGL, that it do so as an “other event” pursuant to G.L. c. 23N, § 3.



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

**FROM:** Andrew Steffen, Sports Wagering Operations Manager

**MEMO** **MEETING**

**DATE:** June 13, 2024 **DATE:** June 20, 2024

**RE:** Request to add Tomorrow's Golf League (TGL) to MGC Event Catalog

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**BACKGROUND:**

Pursuant to [205 CMR 247.03](#), a sports wagering operator must petition the Commission for approval of a new sporting event or wager category. Accordingly, BetMGM has submitted the required form to request for the addition of Tomorrow's Golf League (TGL) to be added to the [MA Sports Wagering Catalog](#).

Under 247.03(8), the Commission may grant, deny, limit, restrict, or condition a request made pursuant to this rule, and may revoke, suspend, or modify any approval granted under this rule.

**SUPPORTING DOCUMENTS:**

Petition from BetMGM  
TGL Wagering Approval Form

**OVERVIEW/ TGL DETAILS:**

In partnership with the PGA TOUR, the TGL is an innovative golf league combining advanced technology and live action golfing. The inaugural season is set to tee off on January 7, 2025, with all matches being held at the purpose-built SoFi Center at Palm Beach State College in Florida. The season will include a total of six teams with four players assigned to each team. The six teams have been announced as Atlanta Drive GC, Boston Common Golf, Jupiter Links GC, Los Angeles Golf Club, New York Golf Club, and TGL San Francisco. Players from the teams include Tiger Woods, Justin Thomas, Rory McIlroy, Justin Rose, and Tommy Fleetwood. Each TGL match will feature three players competing for each team in a modern match-play format in a two-hour team golf competition in front of fans.

The golfing experience in this league is unlike any other golf league currently approved in the MA Event Catalog. Playing a hole in the TGL requires all the same shots as on any other golf



course, however instead of hitting onto an open green, golfers will be swinging into a virtual screen. The virtual screen is a giant 64x46 foot simulator powered by Full Swing. Golfers hit from tee boxes with real grass, fairway, rough, or sand into the screen for all tee shots as well as their approach shots. For any shots less than 50 yards to the pin, the golfers will transition to the Greenzone. The Greenzone is a physical, custom-built, 22,475 square foot short game area that can transform between holes. The Greenzone includes a 41-yard-wide turntable that rotates the green to change approach and angles and can morph its own topography.

The ownership group includes TMRW Sports, PGA TOUR Inc, individual team owners, and individual TOUR players. Individual team owners include Arthur Blank and Tiger Woods. The events will be broadcast on the ESPN or ESPN2.

The official rules are available: [Wagering Approval Form](#). A match will consist of two teams competing head-to-head over 15 holes, with each hole worth one point. If tied at the end of 15 holes, the teams will enter an overtime round to determine the winner. For overall season points, the winning team will earn 2 points, while the losing team will earn 0 points for loss or 1 point for loss in overtime. The top four teams of the six will be entered into the playoffs.

**SUMMARY:**

The current MA Catalog offerings for Golf are as follows:

Sport	Governing Body	League	Website
Golf	International Federation of PGA Tours or its Members	Events sanctioned by the International Federation of PGA Tours or its members	<a href="https://www.worldgolfchampionships.com/international federation.html">https://www.worldgolfchampionships.com/international federation.html</a>
	International Events	International Events	<a href="https://www.worldgolfchampionships.com/international federation.html">https://www.worldgolfchampionships.com/international federation.html</a>
Return to Index	Augusta National Golf Club	Masters Tournament	<a href="https://www.masters.com/en_US/index.html">https://www.masters.com/en_US/index.html</a>
	PGA of America	PGA Championship	<a href="https://www.pga.com/">https://www.pga.com/</a>
	The R&A	The Open Championship	<a href="https://www.randa.org/">https://www.randa.org/</a>
	United States Golf Association	U.S. Open	<a href="https://www.usga.org/">https://www.usga.org/</a>
	The Match Series	The Match Series	<a href="https://www.tntdrama.com/capital-ones-the-match">https://www.tntdrama.com/capital-ones-the-match</a>
	LPGA	LPGA	<a href="https://www.lpga.com/">https://www.lpga.com/</a>
	Ladies European Tour (LET)	Ladies European Tour (LET)	<a href="https://www.ladieseuropeantour.com/">https://www.ladieseuropeantour.com/</a>

At the time of submission, BetMGM informed the Sports Wagering Division this league has been approved for wagering in their 10 jurisdictions of Arizona, Colorado, Illinois, Kansas, Louisiana, Maryland, Oregon, Pennsylvania, Tennessee, and Puerto Rico.

Lastly, BetMGM stated they have informed the TGL of its intentions to petition the league for wagering. While the league does not have a player’s association or union, the TGL is in favor of their league being an approved sporting event and assisted in providing the information to BetMGM. Additionally, all players in the TGL are members that are in good standing with the PGA TOUR.

Based on 247.03(4), certain minimum criteria must be met for the Commission to authorize the addition of the event. Those criteria are outlined below with applicable supporting notes provided.

**(a) The outcome can be verified;**

*BetMGM states in their petition the results will be verified by the official TGL website - <https://tglgolf.com/>.*

**(b) The Sporting Event generating the outcome is conducted in a manner that ensures sufficient integrity controls exist so the outcome can be trusted;**

*BetMGM states the TGL acts as its own governing body, however they do have a partnership with the PGA Tour (the organizer of professional golf tours in the US).*

**(c) The outcome is not likely to be affected by any Sports Wager placed;**

*BetMGM states the TGL, in partnership with the PGA, strictly prohibits game manipulation by athletes, officials, and all league personnel. Within the Wagering Approval Form is an integrity policy, also in partnership with the PGA and U.S. Integrity.*

**(d) The Sporting Event is conducted in conformity with all applicable laws.**

*BetMGM states in their petition the sporting event conforms to all applicable laws and regulations and does not contravene any gaming legislation in the state.*

**CONCLUSION:**

The Sports Wagering division confirms the minimum requirements have been met pursuant to 205 CMR 247.03 and has no reservations approving this league be added to the event catalog.



## MASSACHUSETTS GAMING COMMISSION

# PETITION FOR A SPORTING EVENT OR WAGER CATEGORY

*In accordance with 205 CMR 247.03*

### **Directions:**

Please fill out and address all areas of the form. If an area does not apply to the request, please place 'NA' in the section. Each section will extend to accommodate large answers. If needed, one may attach additional documents. Please make sure any attachments reference the relevant section and number in their title.

### **SECTION A** **BACKGROUND**

1. NAME OF OPERATOR(S) PETITIONING:
2. REQUESTING A SPORTS WAGERING EVENT OR WAGERING CATEGORY:
3. NAME OF EVENT OR WAGERING CATEGORY:
4. IS THIS A VARIATION OF AN AUTHORIZED SPORTING EVENT OR WAGER CATEGORY?
5. IS THIS A COMPOSITE OF AUTHORIZED SPORTING EVENTS OR WAGER CATEGORIES?
6. IS THIS A NEW SPORTING EVENT OR WAGER CATEGORY?

WEBSITE LINK FOR THE EVENT AND/OR GOVERNING BODY:

### **SECTION B** **A COMPLETE AND DETAILED DESCRIPTION OF THE SPORTING EVENT OR WAGER CATEGORY FOR WHICH APPROVAL IS SOUGHT**

1. A summary of the Sporting Event or Wager Category and the manner in which Sports Wagers would be placed and winning Sports Wagers would be determined.
2. A draft of the proposed House Rules, including a description of any technology that would be utilized to offer Sports Wagering on the Sporting Event or Wager Category.
3. Any rules or voting procedures related to the Sporting Event or Wager Category.
4. Assurance that the Sporting Event or Wager Category meets the requirements of 205 CMR 247.03(4) (*details are required in the minimum criteria section below*).
5. Whether and to what extent the outcome of the Sporting Event or Wager Category is determined solely by chance.



**SECTION C**  
**IF THE PROPOSED SPORTING EVENT OR WAGER CATEGORY IS BASED ON ESPORTS ACTIVITIES, PLEASE ANSWER THE FOLLOWING QUESTIONS**

1. The proposed location(s) of the eSports event(s).
2. The video game used for the eSports event, including, without limitation, the publisher of the video game.
3. The eSports event operator, whether the eSports event operator is approved to host events by the video game publisher, and whether the eSports event operator has any affiliation with the video game publisher.
4. The manner in which the eSports event is conducted by the eSports event operator, including, without limitation, eSports event rules and certification from a third party, such as an eSports event operator or the game publisher, that the eSports event meets the Commission's event integrity requirements.

**SECTION D**  
**POLICIES AND PROCEDURES REGARDING EVENT INTEGRITY**

*To the extent known by the operator(s), please provide a description of policies and procedures regarding event integrity.*



**SECTION E**  
**MINIMUM CRITERIA**

1. Can the outcome of the Sporting Event or Wager Category be verified? If yes, explain the verification process.
2. Is the Sporting Event generating the outcome conducted in a manner that ensures sufficient integrity controls exist so the outcome can be trusted? Please explain.
3. Is the outcome likely to be affected by any Sports Wager placed? Please explain.
4. Is the Sporting Event conducted in conformity with all applicable laws? Please explain.

**SECTION F**

**THE COMMISSION WILL CONSIDER THE REQUEST, ALL PROVIDED MATERIALS, AND ANY RELEVANT INPUT FROM THE SPORTS GOVERNING BODY OR THE CONDUCTOR OF THE SPORTING EVENT PRIOR TO AUTHORIZING A SPORTING EVENT OR WAGER CATEGORY.**

1. NAME OF SPORTS GOVERNING BODY:
2. HAS THE SPORTS GOVERNING BODY BEEN INFORMED OF THIS REQUEST?  
*IF 'NO' PLEASE EXPLAIN THE REASON BEHIND IT:*
3. IF THERE IS NO SPORTS GOVERNING BODY, NAME THE ENTITY THAT CONDUCTS THE SPORTING EVENT:
4. HAS THE ENTITY THAT CONDUCTS THE SPORTING EVENT BEEN CONTACTED REGARDING THIS REQUEST?  
*IF 'NO' PLEASE EXPLAIN THE REASON BEHIND IT:*
5. HAS ANY RELEVANT PLAYER'S ASSOCIATION BEEN INFORMED OF THIS PETITION?



IF ANY OF THE ABOVE ENTITIES HAVE BEEN CONTACTED, PLEASE PROVIDE ADDITIONAL  
DETAIL BELOW, INCLUDING BUT NOT LIMITED TO WHEN THE ENTITIES WERE INITIALLY  
CONTACTED ABOUT THE REQUEST ANY COMMENTS OR INPUT PROVIDED BY THE ENTITIES:

**SIGNATURE AND INFORMATION**

*I swear or attest under the pains and penalties of perjury that the information provided as part of this request  
for a hearing is true and accurate to the best of my knowledge and understanding.*

Zachary Krause \_\_\_\_\_  
Signature of individual requesting new event/wager                      Date

[If this request is submitted via email, it may be signed electronically by typing the petitioner’s name on the  
signature line above. In that case, the ‘signature’ must be preceded by /s/ (e.g.- /s/ John S. Doe). Use of an  
electronic signature permits the Commission to rely upon the signature as if it were handwritten.]

Please submit this request and any attachments to the Massachusetts Gaming Commission via email at:  
[mgcsportswagering@massgaming.gov](mailto:mgcsportswagering@massgaming.gov)





**TGL**  
Wagering Approval Form  
January 2024

**CONTEXT & REQUEST:**

- Please provide background/history on your sport, event or property.
  - TMRW Sports is a C-Corp in the state of Delaware responsible for the ideation and creation of the concept, venue and technology. TMRW Sports formed TGL LLC. TGL is comprised of TMRW Sports, the PGA TOUR and Team Owners. There is no governing body. TGL ownership structure is outlined below.

**TGL Ownership Structure:**

- TMRW Sports: 54%
- PGA TOUR Inc.: 18%
- Team Owners: 18% [3% per team – total of 6 teams]
- TOUR Players: 10%

The PGA TOUR is providing the players and governance of the member players. Team owners are responsible for building their brands and creating equity value.

**Top 9 Owners (by % of TMRW Sports)**

- Michael M. McCarley (consolidated entities)
- TWTG LLC
- Symphony Ventures
- Matthew J. Levine
- Connect Ventures I, L.P.
- Joey Brander (consolidated entities)
- Christopher R. Murvin (consolidated entities)
- Eberson-Saint James Family Trust
- 25 Madison Sports LLC

**Team Ownership – Key Owners owning greater than 50% of Team**

- Team 1 – TGRTG, LLC
- Team 2 – TGL Boston LLC
- Team 3 – LA Golf Club, Inc. (Alexis Ohanian as Control Person)
- Team 4 – AMB Team Golf, LLC (Arthur M. Blank as Control Person)
- Team 5 – CPV Golf, LLC (Steven A. Cohen as Control Person)
- Team 6 – TGR (Tiger Woods) Ventures & Harris Blitzer Sports & Entertainment

- Please concisely describe your request for regulators
  - TGL is seeking wagering approval on our events in order to increase fan engagement.



#### **FUNDAMENTAL REQUIREMENTS:**

- Please provide a summary explaining how you comply with the fundamental requirements for permissible wagering and the public policy of a given jurisdiction for your sport / event?
  - TGL is a U.S. professional sport made up of investors, teams and professional athletes who are active, good standing members of the PGA TOUR. TGL has developed a product comprised of data that is valid, consistent and secure for use across wagering opportunities, pre-match and in-play markets. TGL has created an integrity program for its players (via the PGA Tour, Genius Sports and U.S. Integrity) while also launching an employee/vendor/contractor integrity program administered by TMRW Sports, the parent company of TGL.
- Please provide a detailed description of the game rules for your sport/event/organization.
  - See Appendix A for game rules overview.
- Please list the age range of the athletes, whether the league / event is amateur or professional and whether athletes are compensated.
  - The Players are all professional golfers and members of the PGA TOUR in good standing.
  - Ages range from 20 – 50
  - Players are compensated

#### **GOVERNANCE & OVERSIGHT:**

- Describe the governance & oversight of your organization including national governing bodies, international governing bodies and/or state athletic commission approvals required and/or received.
  - TMRW Sports is responsible for the ideation/creation of the concept, venue build-out, and technology to operate all TGL events. There is no governing body as the TGL will govern all rules and participation in coordination with the PGA Tour who is providing the governance of all participating players, including the integrity program.
- Please provide the background of the management of your organization.

##### **Mike McCarley - Founder & CEO, TMRW Sports**

- Advisor, Comcast Sports Tech Accelerator, 2019 – present
- Board of Directors, National Golf Foundation, 2019 – present
- Board of Directors, Arnold & Winnie Palmer Foundation, 2016 – Present
- President, Golf & Global Strategy, NBC Sports Group, March 2011 - Mar 2021
- SVP, Marketing & Communications: Sunday Night Football & Olympics, 2000 – 2011, New York, New York

##### **Chris Murvin - General Counsel and Secretary, TMRW Sports**

- Managing Member, White Swan Advisors, LLC, Jan 2000 – Present
- Senior Vice President of Business Affairs and General Counsel, Golf Channel, Feb 2006-Mar 2021
- Chief Financial Officer, Kessler Collection, Nov 2000 - Nov 2001
- Senior Vice President Business Affairs and General Counsel, Golf Channel, Jan 1995 - Oct 2000
- Managing Partner, Tingle, Murvin, Watson and Bates, P.C., Jan 1988 - Dec 1994
- Partner, LEITMAN, SIEGAL, PAYNE & CAMPBELL, P.C., Sep 1980 - Dec 1987
- Tax Accountant, Price Waterhouse, Oct 1974 - Sep 1977





**Ross Berlin - Senior Vice President, Player Affairs, TMRW Sports**

- Senior Vice President - Player Affairs, PGA Tour, 1992 – 2022
- Senior Vice President – Venues, World Cup USA 1994, 1989 – 1992

**Katy Mollica - Head of Global Partnerships, TMRW Sports**

- Consultant, Apr 2021 – Present, New York, New York, United
- Head of Sales USOPP/LA28, Legends, Jan 2020 - Apr 2021
- Warner Media, VP NCAA Partnerships Turner Sports, September 2007 – Dec 2019
- Virgin, Director Strategic Marketing – Entertainment Group, April 2004 – September 2007
- Screenvision, Marketing Projects Manager, 1999 – 2001
- Promotions/Special Sections Coordinator, The New Yorker, 1997 – 1999

**Andrew Macaulay - Chief Technology Officer, TMRW Sports**

- Chief Technology Officer, Topgolf, January 2015 – December 2022
- Chief Information Officer, WestTower Communications, Mar 2014 - Dec 2014
- SVP & Chief Information Officer, Clearwire, Aug 2009 – Aug 2013
- Principal, Capgemini Consulting, May 2008 – Aug 2009
- SVP Network Engineering, Level 3 Communications, Aug 1998 – Jan 2008
- Systems Development Manager, Sprint, May 1993 – Feb 1998

**Robin Eletto - Chief People Officer, TMRW Sports**

- Chief People Officer, Fanatics, May 2016 – Nov 2021
- Board Member/Sports Committee Advisor, Special Olympics Florida, 2018 – Present
- Chief People Officer, Millennial Media (now Verizon), July 2014 – April 2016
- Executive Vice President Human Resources, Paramount Pictures, July 2012 – June 2014
- Senior Vice President, Human Resources, Disney Consumer Products, Jan 2004 – June 2012
- Director Global Human Resources, AOL/Netscape/Bell Atlantic/Verizon, Nov 1983 – Nov 2003

**Matthew Levine - Senior Vice President, Business Operations, TMRW Sports Group**

- Founder and Managing Partner, CJ Squared, September 2018 – Present
- Co-Founder, Opargo, January 2014 – Present
- Global Chief Operating Officer, People 2.0, Feb 2020 – July 2021
- Chief Customer Officer, Bind On-Demand Health Insurance, Jan 2019 – Dec 2019
- Chief Operating Officer, Workforce Logic, January 2010 – August 2018
- Vice President, Checkpast.com, November 2002 – December 2009
- Operating Consultant, The Tauscher Group, August 2001 – October 2002
- NASDAQ Securities Trader, Onsite Trading, June 2000 – Aug 2001

- Please describe the structure of officiating / judgment / refereeing and who is responsible for overseeing such activity.
  - For all TGL matches, there will be an official referee in the field of play. There will also be a rules official overseeing match play through live viewing and extensive video (replay) purposes. The official will interpret actions of the players and enforce the USGA Rules of Golf, along with the specific TGL modifications noted in Appendix B – Game Rules. The referee and rules official will be supervised by TGL CEO and Vice President of Game Play.



- The individuals selected to administer the roles noted above are Mark Russell and Derrick Stafford.
  - Mark Russell
    - Graduated from Elon University with a degree in History
    - Worked in golf course maintenance at Alamance Country Club in North Carolina
    - Global Director of Golf - Disney
    - Chairman - Walt Disney World Golf Classic
    - Joined the PGA TOUR Rules Committee in 1980
    - Lead the PGA TOUR Competition department from 1999 to 2021 (when he retired)
    - Was the longest active tenured employee at the PGA TOUR at the time of his retirement
  - Derrick Stafford
    - Graduated from Morehouse College with a degree in Business Administration
    - Two-sport athlete at Morehouse playing football and baseball earning all-conference honors
    - Official with the NBA in from 1988 to 2018 (when he retired)
    - Officiated 13 NBA finals games, 180 NBA playoff games, and 1,727 NBA regular season games
    - In addition, officiated 7 years of college basketball
- Please provide an overview of the internal policies and procedures relating to compliance, integrity, oversight, drug testing, etc.
  - In partnership with the PGA TOUR and U.S. Integrity, TGL has developed an extensive Integrity program for its employees, team owners, vendors, contractors and participating players.
  - Please see Appendix A for a formal letter from the PGA TOUR indicating their commitment to the oversight of the player integrity program.
- Please include whether an independent integrity monitoring firm has been engaged.
  - TGL, in partnership with the PGA TOUR, have secured U.S. Integrity to serve as its independent integrity monitoring firm. The partnership was formed in September, 2023 and formally announced on September 13, 2023.

**DATES & TIMES:**

- Please provide the date(s), time(s) and location(s) times of your event(s).
  - The inaugural TGL season will begin on January 7, 2025. Additional schedule details will be released closer to the season launch.
  - All TGL events will take place at the SoFi Center located at 2931 RCA Blvd, Palm Beach Gardens, FL 33410.



Indoor conceptual rendering – SoFi Center:



- Are dates and times of events posted and updated to support wagering activity and in order to prevent past-posting?
  - All dates and times of events will be posted on several digital platforms including the official TGL website, TGL mobile app and TGL social media channels. In addition, our data provider and sportsbook operators will have access to schedules, and updates, in real-time via the TGL product API feed.
  
- Please provide the source of record in which matches / events and dates / times are posted.
  - The source of record for match events, dates, and times will be the official website and mobile app of the TGL.
- Please provide the medium by which viewers / fans will engage and watch the event / sport.
  - Consumers of TGL matches can watch all events live on a national television broadcast through the United States. At the time of submission, we are finalizing a partnership with ESPN for distribution of the events across ESPN and ESPN2.
- Please provide the method of obtaining results and where the results can be found.
  - Match play results can be found on the official website of TGL, the TGL mobile app and various social media channels. In addition, TGL's broadcast partner(s) will distribute all matches live to consumers across the U.S. and Internationally.
  - TGL has developed an internal media distribution platform via ScoreSite. All results will be distributed to 3<sup>rd</sup> parties during and at the conclusion of all matches.
  - TGL is current discussions with partners to serve the digital media market for schedules, scored, and statistics to drive fan activations and engagement.



#### HISTORICAL MISCONDUCT:

- Has your organization ever faced any negative publicity, scandals or controversy in your industry?
  - No
- Has your organization ever been under scrutiny for any controversial business practices or misconduct?
  - No
- Are there any instances in the past where your organization has been accused of any unethical or illegal conduct?
  - No

#### ADDITIONAL INFORMATION:

- Please provide a full description of the types of wagers you are seeking approval for.
  - TGL is seeking betting markets for the following types of wagers:
    - Outright Winner
    - Regular Season Winner
    - Player/Team to reach Semi-Finals/Finals
    - Match Betting
    - Live In-Play Specials
    - Group Betting
    - Hole-In-One
    - To Win Xth Hole
    - Closest to the Pin
    - Leader After 3 Holes
    - Leader After 6 Holes
    - Leader After Session 1
    - Longest Drive of the Match
    - Fastest Ball Speed of the Match
    - Fastest Club Speed of the Match
    - Longest Drive Per Hole (all Par 4's and 5's)
    - Longest Putt
    - Team Markets
    - Head-to-Head Prop Specials
    - Season-Long Stat Leaders
- Please describe the source of data being used for the competition and how you are monitoring its validity and consistency?

The TGL technology infused version of golf has multiple technology components integrated together to create a competitive, accurate, reliable and secure platform.

#### Ball Tracking

- The moment a player hits the specific, USGA approved, TGL golf ball with their USGA approved golf clubs, the tracking systems capture the precise trajectory and spin of the golf ball until it hits the large screen that is between 20 yards and 35 yards from the player, depending on which tee box is being used for the shot.
- **Toptracer Technology** then extrapolates the remainder of the ball trajectory to provide exactly where the ball would have gone if it had not been interrupted by hitting the screen.
- **Toptracer Technology** is the world's most trusted provider of golf ball tracking technology for both driving ranges and professional golf tournaments. They have tracked billions of golf



shots and have the most advanced trajectory extrapolation algorithms. With all players using the same golf ball when hitting into the screen, this makes the tracking even more consistent between players.

- **Full Swing Golf** is the market leader in golf simulator platforms. TGL uses their golf game software to create TGL golf holes and model the ball trajectory information provided by Toptracer accurately and consistently into the 3D computer generated golf hole. Using a full physics model and a Unity gaming engine, the Full Swing game allows the golf ball trajectory to intersect with ground surfaces, or obstacles like trees, and stop in the appropriate position as if it were a real-life version of the golf hole being played.
- TGL competition also uses **Full Swing Golf's** commercially available KIT launch monitor to capture the precise spin of the golf ball when hit by each player. This spin calculation is used to accurately and consistently model the reaction of the ball when it hits an object in the game. For example, a ball with a lot of spin would check up and stop quickly when hitting the green, whereas a ball with low spin would bounce and run a longer distance.
- Full Swing Golf's simulators and KIT launch monitors are used, relied upon, and recommended by the best players in the world.

#### **Competition Scoring & Database**

- Given the unique nature of TGL's competition format and rules, TGL contracted with leading technology consulting firm, **CapTech**, to build a custom match administration and scoring system. This system allows an operator to set up each match before matchday, selecting the teams, players and holes to be played that night and locking it all in so no changes are made on match night.

The human operator/scorer sits court side and uses the Match Admin Console (MAC) software to live score the game based on observing the game and communications from the on-field referee and in-booth rules official.

All data related to the competition is contained in the ScoreSight™ data platform, also built for TGL by CapTech. ScoreSight integrates with all TGL data sources to bring that data into the platform and consolidate game-play and scoring in real-time. It is the single source for all competition related data and it makes that data securely available to all approved 3<sup>rd</sup> parties ensuring consistency of data across all subscribers.

The MAC and ScoreSight are built on Amazon AWS technology platforms using well architected principles validated by Amazon AWS experts.

In addition to being expert technology innovators, **CapTech Consulting** has deep experience in the professional sport of golf, being a technology partner to the PGA Tour and the Official Digital Technology Services Agency of the PGA of America and PGA Championship.

#### **Redundancy/Resilience**

- All the TGL technology platforms have multiple layers of redundancy and resiliency. Unlike other sports, if TGL technology stops working the actual game stops being played.

The network infrastructure, cabling and devices, has no single points of failure and dual redundancy at every layer, including physically geographically diverse connections to the internet, and directly to AWS and for broadcast TV transmissions.



All competition technology hardware and software used for tracking, scoring and recording has a minimum of dual redundancy for every component. The Toptracer Technologies tracking system has 4 levels of redundancy with all 4 instances tracking every shot live.

### **CyberSecurity**

- TGL ensures systems and data are protected from corruption by bad actors through a well architected and implemented CyberSecurity strategy using leading principles for:
  - Governance & Oversight
  - Proactive Cyber Risk Management
  - Cybersecurity Operations
  - Information Protection & Privacy
  - Robust Incident Response & Management
  - Threat Intelligence

This includes partnering with the Department of Homeland Security (DHS) Cybersecurity & Infrastructure Security Agency (CISA), who has designated TGL as Critical Infrastructure based on the high profile and public nature of TGL events. DHS CISA's Critical Infrastructure designation provides TGL with extensive cyber and physical security resources - at no cost - including resilience reviews, site infrastructure surveys, threat assessments, as well as extended partnership development amongst other key federal, state, and local resources.

- Please list any current partnerships, sponsorships or other relationships you have with sportsbooks.
  - There are no current partnerships with sportsbooks. However, TGL is in active conversations to secure a relationship with licensed sportsbook operator(s) in the U.S.
- Please provide contact information including corporate address, email address and phone number for your organization.
  - 807 S Orlando Ave, Suite J, Winter Park FL 32789
  - Email: [info@tmrwsgroup.com](mailto:info@tmrwsgroup.com) or Corporate Officer and SVP, Business Operations: [Matthew.Levine@tmrwsgroup.com](mailto:Matthew.Levine@tmrwsgroup.com)
  - Office Phone Number: 321-641-2024



**Appendix A**  
PGA TOUR Player Integrity Program



**Andy Levinson**  
Senior Vice President  
Tournament Administration

September 7, 2023

To Whom It May Concern:

On behalf of the PGA TOUR, this letter is written to affirm that the PGA TOUR Player Integrity Program (the "Program") will apply to PGA TOUR players participating in the TGL. The Program is a comprehensive system of integrity education, monitoring and policies and procedures designed to prevent wagering-related corruption with respect to the PGA TOUR and its players. The Program will prohibit players from wagering on TGL events and from disclosing inside information for wagering on TGL events, among other things.

We understand TGL will partner with U.S. Integrity to monitor for integrity violations with respect to TGL events and to assist TGL with integrity-related matters. In the event TGL or U.S. Integrity notifies PGA TOUR of a potential violation of the Program by a PGA TOUR player with respect to a TGL event – or PGA TOUR otherwise becomes aware of a potential violation – the PGA TOUR will commence an investigation under the Program, which could result in a suspension or ban from PGA TOUR events. We understand that TGL intends to recognize any such suspension or ban for TGL events.

If you have any questions, please direct them to the undersigned.

Sincerely,

Andy Levinson  
Integrity Officer

PGA TOUR  
1 PGA TOUR Boulevard, Ponte Vedra Beach, FL 32082  
tel 904.280.2487  
PGATOUR.COM



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## Glossary

### Traditional Golf Terms

Addressing Ball	When player stands over the ball with intent to put the ball into play
Backswing	The first part of a swing that involves the club being taken away from the ball
Birdie	A score of one under par on a hole
Bogey	A score of one over par on a hole
Bunker	A hollow area comprised of sand that exists as an obstacle
Chip Shot	A short distance shot to the green
Concede a Hole	Stopping play and admitting the opposing player has "won" the hole
Eagle	A score of two-under-par on a hole
Fairway	The central grass area between the tee box and hole that is kept free of tall grass
Gimmie	A putt that other players agree counts as made without being played
Hole (1)	A unit of play on a golf course; One "hole" refers to the total area from tee box to putting green
Hole (2)	The physical cup on the putting green in which players hit their ball
Re-Hit	To replay a shot from the spot of the previous stroke without penalty
Par	The number of strokes a player is expected to make on a hole
Pin	The stick & flag that stands in the cup on a putting green
Putting Green	The closely cut grass area where the pin and hole are located
Rough	Area of grass that borders the fairway and putting green which is deliberately kept longer
Short Game	Shots played on and around the green, including putting, chipping/pitching, and bunker shots
Tee Box	The area where players tee to start a hole



## TGL Terms

Back Box	Hitting area which is 35yds away from the screen used for all shots 160yds and over
Pre Tee-Shot Hammer	A hammer thrown prior to any shots being hit on a hole and must be accepted, raising the hole value to 2 points
Booth Official	Responsible for starting and stopping shot clock, upholding TGL Rules
The Course	The venue floor that encompasses the entire competition area
Front Box	Hitting area which is 20yds away from the screen used for all shots 159yds and under
Game Engine	Software used to run the virtually simulated environment
Greenplay	The short game shots that are played in the Green Zone
Green Zone	A short game area made up of fairway, rough, and greenside bunkers encompassing the putting green. A version of the Green Zone will be represented on every hole in TGL for both screenplay and greenplay
Hammer	A game modifier that increases the hole value +1 point
Interference	A disruption caused by either player, fan, or outside force that can warrant a pause in play
Launch Monitor	An electronic device that tracks golf ball flight characteristics
Match	Head-to-head competition between two teams over 15 holes
Player	A player refers to a golfer actively participating in a TGL Match
Referee	Will maintain pace of play, and uphold TGL Rules on the course
Screenplay	Shot that are hit into the simulator screen from both the front box and back box
Session	A sub-segment of a match between two teams over 6 or 9 holes consisting of different formats
Singles	Two players play head-to-head against each other for an entire hole
Sky Mark	A custom technology built to aid the Player & Referee in transitioning a ball from screenplay to greenplay
Triples or "Trips"	Three players per team competing in an alternate shot format

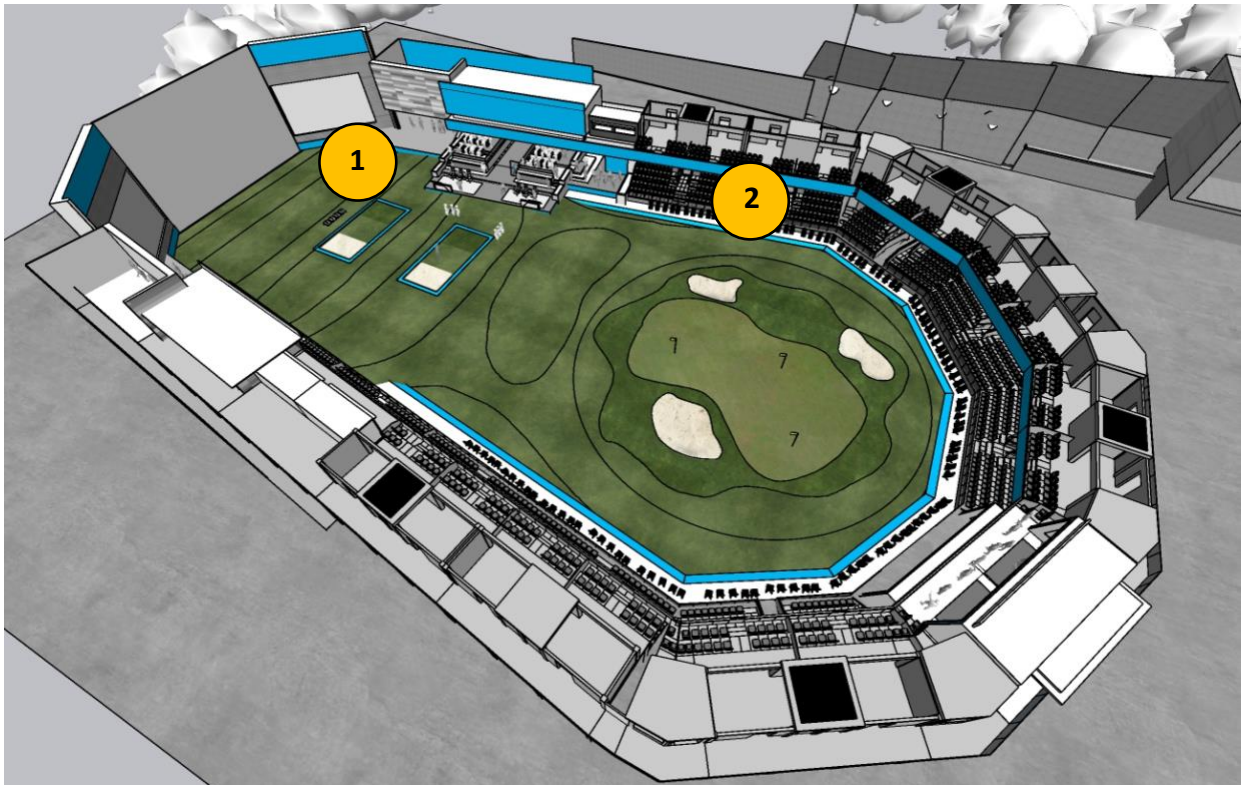


## League Overview

TGL is a mixed reality golf League in partnership with the PGA TOUR fusing golf and technology with the best players in the world competing. The League will consist of six (6) teams who match up against each other in a season long points format. Competitions will take place in a live arena environment where holes begin with shots into the world's largest simulator screen and end by playing in a tech infused short game area.

### Hitting Areas:

Figure 1.0 – TGL Stadium Rendering



(2) **Greenplay:** Players will complete the final stage of each hole in the real-world short game area known as the Green Zone. The main components of this area include:

- One hundred and twenty-four (124) foot turntable that can rotate one hundred and eighty (180) degrees in either direction
- Tech infused putting green with three sections that can create dynamic topographies
- Surrounding apron and rough
- Surrounding bunkers

## Match Week Overview

### Hole Selections for Match

TGL has a large library of holes custom designed by golf course architects to the specifications previously provided by the League. The League will select fifteen (15) holes from that library to be played during a match, and they will be sent to the players participating no less than four days prior to the match.



## Players and Matchup Selections for Match

TGL will consist of six (6) teams of four (4) players, with three (3) active players playing per night. The League reserves the right to select or designate player matchups (i.e., who is playing who) for each match in the regular and post season.

## Home and Away Teams

Each match will have a designated “home” and “away” team. Each team in TGL will have the opportunity to be the home team twice during the regular season. Being the home team will have several benefits otherwise known as “home course advantages” and consist of the following:

- Able to set the playing order (leadoff, middle, anchor) for the match based on the information provided by the League regarding holes to be played and player matchups
- Start the match with possession of the hammer (*See “Article 3: Hammer”*) and first tee honors

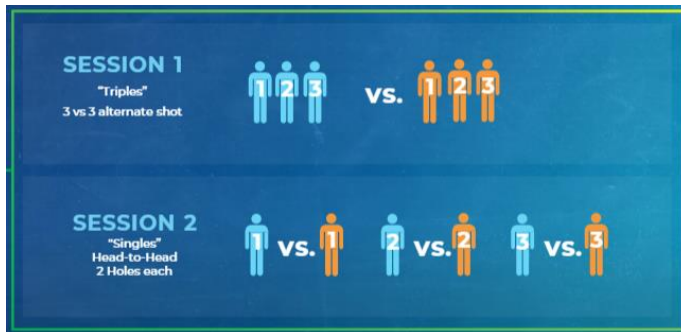
In certain instances, the League will dictate a team matchup as a “rivalry” and therefore will be played as a “neutral site” match. Matchups and playing order for matches of this denotation will be decided by the League. Hammer possession and first tee honors will then be decided by a “pre-match competition” that will take place prior to the start of the match. (*See Match Format & Scoring “Article 2: Pre-Match Competition”*)

## Match Format, Scoring, & Rules

### Article 1: Modern Match Play Scoring

Scoring will be “Modern Match Play” meaning that each hole begins with the value of 1 point and the team with the fewest strokes (shots) on a hole wins the point(s). Ties are worth zero (0) points and there are no carryovers.

### Article 2: Competition Overview



## Match

A “match” will consist of two teams competing head-to-head over 15 holes.

## Sessions

Within a match there will be two sessions played in two golf formats. Session order is as follows:

- Session One is 9 holes of “Triples” or “Trips.” Player one for each team will tee off on holes 1, 4, & 7, player two will tee off on holes 2, 5, & 8, and player three will tee off on holes 3, 6, & 9. Each player will tee off on a par 3, 4, & 5.
- Session Two will be 6 holes “Singles”. Player one for each team will play head-to-head on holes 10 & 13, player two for each team play holes 11 & 14, and player three for each team play holes 12 & 15. Session two will be made up of two par 3’s, two par 4’s, and two par 5’s spread across the six holes.



### **Conceded Holes & Strokes**

In modern match play, players and teams are allowed to concede a stroke to the other player/team, at their discretion. When a stroke is conceded, the opposing team is allowed to pick up their ball and have one (1) additional stroke added to their score (i.e., a gimme). Additionally, players and teams are allowed to concede a hole at any time, giving the opposing team a win on the hole. When a concession has been made it must be announced by the player in a clear and concise manner to the referee who must acknowledge the concession.

### **Winning Team**

The team that wins the most points during the entirety of a match is the winner. If both teams have the same number of points at the end of regulation, teams will compete in an overtime competition.

### **Overtime**

If the match is tied after 15 holes the teams will then play a 1 vs 1 closest to the pin competition in the short game area. The team that started the match with the hammer will go first in overtime. Teams may select their playing order during overtime; however, all players must hit a shot before an individual player can hit again. After each matchup (i.e., Player 1 for each team plays) the team with the ball closest to the pin (ball must still be on the green when it comes to rest) will receive a point. Then the format will continue with Player 2 for each team, and so on until after a team successfully hits two shots closer to the pin than their competitors. The team that went first in the first matchup will go second in the second matchup, and that order will continue to alternate. In the case where more than three shots per team are necessary to prove a winner, teams will continue in the order previously played.

#### Winning team:

- 1 team point for the overall match score (i.e., if match was tied 5-5 then the final match score would be 6-5)
- 2 points towards their season standings

#### Losing team:

- 1 point towards their season standings

### **Regular Season Point System**

TGL will use a points-based system to determine regular season standings. For each match, teams can be awarded up to two (2) points towards their regular season total based on the following:

- Win in Regulation.....2 Points
- Win in Overtime.....2 Points
- Loss in Overtime.....1 Point
- Loss in Regulation.....0 Points

### **Pre-Match Competition**

A “Pre-Match Competition” will take place **in the Green Zone only** prior to the start of a “neutral site” or “rivalry” match. This competition will determine which team starts with hammer and first tee honors since no team is considered the “home team.” The Pre-Match Competition will be a game that can either be a 1 vs 1 first point wins competition, or a first to 2 or 3 point competition including all three team members.

#### Article 3: Hammer

The “hammer” is a game modifier that will change the hole value by adding 1 point to the value. For instance, each hole starts with a value of 1 point, when a hammer is played and accepted the value of the hole would now be 2 points. If another hammer is played and accepted the value of the hole would now be 3 points, etc.



At the start of the match, only the home team shall have possession of the hammer (*See Section “Match Week Overview and Team Format” then “Home and Away Teams” above for initial Hammer possession*) – meaning they are the only team with the option to use it. Once the hammer is used, ownership of the hammer shall switch to the other team which allows them to use it any time they choose.

### **Hammer Mechanics**

Teams or players shall throw the hammer, which will be an item provided by the League, and tell the Referee who must acknowledge the call. After hammer has been thrown the Referee then presents the opposing team with two options:

- Accept hammer – If the opposing team accepts the hammer, the hole value is now worth 1 point more and the hole is continued to be played
- Decline hammer – If the opposing team declines the hammer, the hole is immediately conceded and the point(s) is awarded to the team who called the hammer

After either option is chosen, the hammer changes ownership to the other team who can then use it under the same guidelines. There is no requirement to use the hammer nor is there a limit on the number of times a hammer can be used.

### **Hammer Timing**

“Hammer” can be thrown any time prior to a player addressing the ball. The Referee will put their hand up after they deem the ball has been addressed which will “close the window”. If the player proceeds to back off the ball then the Referee reserves the right to re-open the window by lowering their hand. Teams can only use the hammer after a single shot has been played on a hole.

### Article 4: Pre Tee-Shot Hammer

A hammer thrown prior to a tee shot being hit by either team will be treated the same as a regular hammer, however **the opposing team cannot decline and must accept** the hammer. Possession of the hammer changes as it does with normal hammer rules.

### Article 5: Score Keeping

An official scorer shall be responsible for all score keeping activities such as stroke counting, penalty assessment, and hole result. Players will not be responsible to track their own scores or submit a scorecard at the conclusion of a match.

### Article 6: Local Rules

TGL shall have local rules to accommodate the unique format and stadium features in which a match is played. TGL will not treat rules violations from the traditional matchup:

### **Preparing For and Making A Stroke**

- A ball first becomes “in play” on a hole when the player makes a stroke at it from inside the screenplay area
- Thereafter, any ball which is dropped, placed, or replaced is “in play” when the player makes their next stroke at the ball
- A ball is not in play in the Green Zone until the ball is struck
- 1-Stroke penalty and voided stroke for playing out of turn (either wrong team member or team that does not currently have honors)



- 1-Stroke penalty for grounding your club in a bunker
- A “shot clock violation” is determined by the shot clock reaching zero (0) before the ball is struck
- There is no “one ball rule” a new ball can be placed for a shot at any time
- Players will put their ball into play for every shot in TGL
  - For screenplay, they will place their ball in the fairway and sand, and drop their ball in the rough
  - For greenplay players will always place their ball on the Sky Mark, and will not be required to drop onto any surface

#### **Inaccurate Computation/Unregistered Shot**

- The Referee or Official shall have the ability to deem a shot during screenplay an “inaccurate computation” at their discretion to maintain the integrity of the match and facilitate the competition. They also will have the authority to deem a re-hit. Scenarios where this may incur includes, but is not limited to, the following:
  - Shot not captured – If a ball is struck and the simulator fails to capture it, then the Referee or Official shall invoke a re-hit. The attempted stroke is not counted towards the player’s total strokes attempted. The only exception is when both the Referee and Official decide the ball was in fact mishit (commonly referred to as “shanked”), then they will give the player a 1-stroke penalty.
  - Inaccurate simulator reading – If a ball is struck and the simulator produces an output that is clearly and obviously incorrect, then the Referee or Official shall invoke a re-hit. The attempted stroke is not counted, and the ball is reset to its previous resting position.
  - Interference – A disruption of any kind and a player had already started their swing and hits the ball then the Referee or Official can invoke a re-hit. The attempted stroke is not counted, and the ball is reset to its previous resting position.

#### **Relief in Green Zone**

Players shall qualify for relief from conditions that are clearly unintended or affect the quality of the competition. Such conditions include, but are not limited to, the following:

- Ball coming to rest in a turntable seam
- Ball coming to rest near immovable objects and player is unable to attempt a stroke on the ball
- If a player hits a shot in the Green Zone that comes to rest against the grandstands, then the player shall gain relief from the grandstand from a point no closer to the hole that allows them to make an attempt at a stroke

#### **Rule of Elasticity**

The match Referee will maintain a floating “Rule of Elasticity” for any circumstance that is deemed a deviation from the norm. They will reserve the right to make judgment calls based on their best ability in the given circumstances.

#### Article 7: Penalties

TGL will govern by the League rules set forth in this document as well as the traditional rules of golf played on the PGA TOUR. Rules have been set in place to meet the “spirit of the competition” and remain applicable under the conditions of the TGL environment. Examples of potential penalties from the traditional rules of golf include, but are not limited to, the following:

- 1-Stroke penalty for hitting into penalty areas
- 2-Stroke penalty for deliberately interfering with any moving ball



## Game Timing

### Article 1: Length of Game

A match will not have an official game clock that defines play in regulation. However, the length of a match shall take around two (2) hours to align with broadcast requirements.

### Article 2: Shot Clock

The “shot clock” refers to the timing device that displays the countdown of time in which each player must record a stroke. The shot clock will be forty (40) seconds. After each shot clock violation, a team will incur a 1-stroke penalty.

#### **Shot Clock Enforcement**

League Referee and Official shall be responsible for the management and enforcement of the shot clock.

#### **Starting the Shot Clock**

The shot clock shall start any time the following occurs:

- The Booth Official deems a player can play without interference or distraction
- The Booth Official deems a team or player has had adequate time to prepare for a shot following a timeout
- The Booth Official deems a team or player has had adequate time to transition into the Green Zone

#### **Stopping and Resetting the Shot Clock**

The shot clock shall be stopped & reset any time the following occurs:

- A player has completed their turn
- A player incurs a shot clock violation
- A player incurs a penalty
- A player calls a timeout
- A hammer is thrown
- A Referee or Official determines the shot clock must be reset to accommodate a special circumstance

### Article 3: Timeouts

Each team will have two (2) timeouts per session that will last fifteen (15) seconds each. Timeouts may be called at any point by the team whose player is currently hitting. The opposing team will have until the Referee puts up their hand signaling a player has addressed the ball to call a timeout, in order to avoid interference. Players must wait until the entire fifteen (15) seconds has expired before they can hit their next shot.

#### **Timeout Mechanics**

A member of the team will signal or verbally call a timeout to the referee, who will acknowledge the call. A team cannot call back-to-back timeouts while on the current shot, they must wait until the shot is hit following a timeout to then be allowed to call another.

#### **Injury Timeouts**

If a player becomes injured during a match, Referees/Officials can grant injury timeouts to provide care and treatment to the injured player. Injury timeouts will not be counted against a team’s official timeout count. However, if a player is suspected of taking advantage of injury timeouts as a competitive advantage, the situation will be reviewed by TGL Officials for potential disciplinary action.





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## **Player Eligibility & Injuries/Substitutes**

### Article 1: Eligibility

As noted above, TGL teams will consist of six (6) teams of four (4) players each. To be eligible for the TGL League, players shall be members in good standing with the PGA Tour. Exceptions to be approved in advance by TGL League office.

### Article 2: Injuries

#### **Injuries & Conflicts**

If a "starting" player is unable to compete in a match due to injury, logistical conflict, or other unforeseen circumstances, teams shall be allowed to select a new player to take their place. Players must be approved in advance by the League office. Teams will have up until two (2) hours before the match starts to make a substitution.

#### **Injury Substitutions**

If a player becomes injured during a match, teams will not be allowed to substitute for that player and must continue with only two players. The remaining players will rotate their order of filling in for the injured player and triples will become a two-man alternate shot for that team. During singles the team will keep their order and each player will take a hole previously assigned to the injured player. If a team or player is suspected of taking advantage of an injury substitution for a competitive advantage, the situation will be reviewed by TGL Officials for potential disciplinary action.

## **Match Progression**

### Article 1: Screenplay

Each hole shall begin in the screenplay area where players will hit shots until they progress into the Green Zone.

#### **Teeing Off**

Every tee shot by both teams shall take place in the screenplay area. The order in which players hit off the tee will be determined by the following:

- First hole of match: As mentioned above, the home team will obtain 1<sup>st</sup> tee honors
- Team lineups will be set prior to the match and each player will have designated holes where they will be teeing off for each session:
  - Player 1 for each team will tee off on holes 1, 4, & 7 for Session 1 (Triples) and holes 10, & 13 for Session 2 (Singles)
  - Player 2 for each team will tee off on holes 2, 5, & 8 for Session 1, and holes 11 & 14 for Session 2
  - Player 3 for each team will tee off on holes 3, 6, & 9 for Session 1, and holes 12 & 15 for Session 2
- The rest of the match will follow traditional golf rules of who has the tee honor

#### **Screenplay to Greenplay**

Player order after tee shots shall be determined by distance to pin whereas the player furthest from the hole will hit first.



After each tee shot and the ball has not reached the Green Zone, players will put their ball on the correct section of the hitting area prior to their next shot (sand, fairway, or rough). If the player's ball is in the fairway or sand they will place their ball into position. If they are in the rough then the player must drop their ball into position. *(See Above Section "League Overview" "Screenplay")*

Each drop will be overseen by the Referee who will also be consulting with the Official to ensure fair play. Players shall continue hitting in the screenplay area until they reach the Green Zone threshold on the screen.

## Article 2: Transition to The Green Zone

The Green Zone threshold shall be defined as the criteria required for a player to begin greenplay. Until a player's ball meets the threshold, they shall continue in the screenplay area. Because an exact replica of the real Green Zone will be represented in every virtual golf hole played in TGL, the game engine will determine when a shot has reached the Green Zone threshold. Once in the Green Zone players will pitch, chip and putt until their ball is holed out, the opposing team concedes a putt, or the opposing team concedes the hole.

## Article 3: The Green Zone

### **Ball Placement**

Ball placement in the Green Zone will be done by using the ball placement mechanism "Sky Mark," a custom technology built to guide the transition of a ball from screenplay to greenplay. "Sky Mark" will illuminate an area in the Green Zone where a player must place their ball to correctly matchup with the coordinates in the virtual hole. If "Sky Mark" is on the putting green, then the player can place a ball marker on the "Sky Mark."

### **Regular Season & Playoffs**

As noted above, TGL will consist of a six (6) team League and each team will play each other one time in the regular season.

### **Playoffs**

The **top four teams** with the most regular season points will advance to the playoffs. *(See Above Section "Regular Season Points System")* Playoff seeding will also be based on the most regular season points. In the event of two teams finishing with the same record, tie-breaker criteria will be as follows:

- Total holes won in regular season
- Point differential in regular season matches
- Total hammers won in regular season
- Fewest holes lost in regular season
- Total sessions won in regular season
- Fewest hammers lost in regular season

The playoffs will use a single elimination matchup for round one. The winners of those matchups will then progress to a best of three series format for The Championship where the two teams remaining play until a team has won two (2) matches. Round one match-ups will be determined by seeding as follows:

- #1 Team vs #4 Team
- #2 Team vs #3 Team

The higher seeded team in both matchups will be treated as the "home team" and will therefore retain the "home course advantages" as specified above. *(See "Match Week Overview and Team Format" then see "Home and Away Teams")*



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### **Championship**

As specified above, The Championship will be a best of three series. The winner of the series will be crowned Season Champions. The higher seeded team will be designated as the “home team” for matches one and three, the lower seeded team will be the “home team” for match two. If a match is mathematically over, meaning the losing team cannot possibly earn enough points to overtake the winning team before they have played all 15 holes then the match will be declared finished.

### **Awarding of 3<sup>rd</sup> and 4<sup>th</sup> Place**

Teams losing in the 1<sup>st</sup> round of the Playoffs will be awarded 3<sup>rd</sup> and 4<sup>th</sup> place by which team won the most holes during their semi-final match. If both teams won the same number of holes, then the team that won the regular season matchup between the two teams will be considered the 3<sup>rd</sup> place team

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*Jackrabbit*

MASSACHUSETTS GAMING COMMISSION

MGC Approved Seal

ROUND 2 — 05.01.2024



original



option 1



option 2



option 3



option 4

**If you need help:**

The National Council on Problem Gambling operates the National Problem Gambling Helpline Network (1-800-522-4700). The network is a single national access point to local resources for those seeking help for a gambling problem. The network consists of 28 call centers which provide resources and referrals for all 50 states, Canada and the US Virgin Islands. **Help is available 24/7 and is 100% confidential.**

The National Problem Gambling Helpline Network also includes **text and chat services**. These features enable those who are gambling online or on their mobile phone to access help the same way they play. One call, text, or chat will get you to problem gambling help anywhere in the U.S. 24/7/365.

You can also visit National Problem Gambling Helpline Network here: <https://www.ncpgambling.org/help-treatment/help-by-state/>



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