



NOTICE OF MEETING AND AGENDA

Pursuant to the Massachusetts Open Meeting Law (G.L. c. 30A, §§ 18-25), and St. 2025, c. 2, notice is hereby given of a public meeting of the **Massachusetts Gaming Commission**. The meeting will take place:

Thursday | August 27, 2026 | 10:00 a.m.

VIA CONFERENCE CALL NUMBER: +1-213-631-9908

PHONE CONFERENCE ID: 672 464 124#

All meetings are streamed live at www.massgaming.com.

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

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

PUBLIC MEETING - #596

1. Call to Order – Jordan Maynard, Chair

2. Meeting minutes

a. July 22, 2026

VOTE

b. July 28, 2026

VOTE

3. Research and Responsible Gaming – Mark Vander Linden, Director of Research and Responsible Gaming

- a. Presentation of report, "Perspectives on Sports Betting among Young Adults in Massachusetts: A Community-Engaged Research Study" – Petry Ubri, Senior Research Scientist, NORC at the University of Chicago, Katie Gallant, Research Scientist, NORC at the University of Chicago, and Jared Sawyer, Data Scientist, NORC at the University of Chicago



Massachusetts Gaming Commission

4. Community Affairs Division – Derek Lennon, Chief Financial and Accounting Officer; Mary Thurlow, Senior Program Manager
 - a. Encore Boston Harbor Q2 2026 Quarterly Report – Juliana Catanzariti, Vice President and General Counsel; Tom Coffey, Executive Director of Security and Investigations
 - b. Plainridge Park Casino Q2 2026 Quarterly Report – Marc Guastella, Vice President and General Manager; Bob Charette, Director of Security
5. Sports Wagering Division – Carrie Torrisi, Division Chief of Sports Wagering
 - a. Extension Request for a Temporary Waiver from Amended 205 CMR 247.07 and 205 CMR 248.10 Related to Debit Access Instruments - Tom Lam, Compliance and Operations Manager
 - i. Fanatics **VOTE**
 - b. Updates to BetMGM & MGM Springfield House Rules – Brittany Costello, Compliance Officer II **VOTE**
 - c. Update to Fanatics Betting & Gaming House Rules - David Harrison, Compliance Officer II **VOTE**
6. Investigations and Enforcement Bureau – Caitlin Monahan, Director of Investigations and Enforcement Bureau
 - a. Plainridge Park Casino’s Request for an Amendment to the Beverage License – Richard Lawless, Licensing Interim Chief **VOTE**
7. Legal Division – Kevin Scanlon, General Counsel
 - a. 205 CMR 116.08: Notice – Discussion and Review of Regulation and Small Business Impact Statement for authorization to begin the promulgation process – Jenna Hentoff, Deputy General Counsel **VOTE**
 - b. 205 CMR 229.01: Notice – Discussion and Review of Regulation and Small Business Impact Statement for authorization to begin the promulgation process – Jenna Hentoff, Deputy General Counsel **VOTE**
 - c. 205 CMR 146.18: Baccarat, Midi-baccarat, Mini-baccarat, and Baccarat-chemin de Fer Tables; Physical Characteristics – Discussion and Review of Regulation and Amended Small Business Impact Statement for Final Review and Adoption –Jenna Hentoff, Deputy General Counsel; Judith Young, Senior Associate General Counsel **VOTE**
 - d. MGM Springfield's Request to Join an Existing Wide Area Progressive and Waiver Request – Jenna Hentoff, Deputy General Counsel; Burke Cain, Gaming Agents Division Chief; David DiOrio, Assistant Chief of the Gaming



Massachusetts Gaming Commission

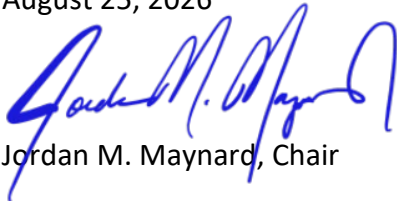
Agents; Kevin Gauvreau, Acting Director of IT Services; Cristian Taveras,
Gaming Technical Compliance Manager **VOTE**

8. Commissioner Updates

9. Other Business - Reserved for matters the Chair did not reasonably anticipate at the time of posting.

I certify that this Notice was posted as "Massachusetts Gaming Commission Meeting" at www.massgaming.com and emailed to regs@sec.state.ma.us. Posted to Website: August 25, 2026 | 10:00 a.m. EST

August 25, 2026



Jordan M. Maynard, Chair

*If there are any questions pertaining to accessibility and/or further assistance is needed,
please email stephanie.smith-abdoo@massgaming.gov*



Massachusetts Gaming Commission

101 Federal Street, 12th Floor, Boston, Massachusetts 02110 | TEL 617.979.8400 | FAX 617.725.0258 | www.massgaming.com



Massachusetts Gaming Commission Meeting Minutes

Date/Time: July 22, 2026, 10:30 a.m.

Place: Massachusetts Gaming Commission

VIA CONFERENCE CALL NUMBER: +1-213-631-9908

PHONE CONFERENCE ID: 153 443 973#

The Commission conducted this public meeting remotely utilizing collaboration technology. 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 Jordan Maynard

Commissioner Eileen O'Brien

Commissioner Bradford Hill

Commissioner Nakisha Skinner

Commissioner Paul Brodeur

1. [Call to Order](#) (06:57)

Chair Maynard called to order the Public Meeting #593 of the Massachusetts Gaming Commission ("Commission"). Roll call attendance was conducted, and all five Commissioners were present for the meeting.

2. [Meeting Minutes](#) (07:32)

a. June 18, 2026

The June 18, 2026 public meeting minutes were included in the Commissioners' Packet on pages 3 through 26.

Commissioner Brodeur moved that the Commission accept the minutes from the public meeting held on June 18, 2026 as included in the Commissioners' Packet and discussed here today, subject to any revisions for typographical errors or any other non-material matters. Commissioner O'Brien seconded the motion.

Roll call vote:

Commissioner O'Brien: Aye.

Commissioner Hill: Aye.

Commissioner Skinner: Aye.

Commissioner Brodeur: Aye.

Chair Maynard: Aye.

The motion passed unanimously, 5-0.

3. [Administrative Update](#) (08:21)

a. Update on position posting - Division Chief, Government and Community Affairs

Executive Director Dean Serpa stated that the Commission would be moving forward with a job posting regarding the recent vacancy for Community Affairs Division Chief though he noted that the position title had changed to Chief of Government and Community Affairs. *A memorandum, the job description, and the job posting were included in the Commissioners' Packet on pages 27 through 35.* Executive Director Serpa explained that this role was a major policymaking position subject to the Commission's Hiring Policy 01.03.01 and would require the filing of an annual Statement of Financial Interest.

Commissioner O'Brien suggested that the job posting should emphasize a preference for candidates with experience with the open meeting law and public records law. Executive Director Serpa noted that he would add that experience to the preferred qualifications. Commissioner Brodeur stated that the growth of prediction markets created a need for knowledge of and interaction with the federal government. He noted that the Community Mitigation Fund being funded again also created a need for this type of role. Executive Director Serpa stated that these matters were considered in developing the job description.

Chair Maynard expressed that he was comfortable with Executive Director Serpa setting up the hiring committee and that he did not feel he needed to serve on the committee. Commissioner Hill agreed. Executive Director Serpa stated that he would keep the Commission updated regarding the hiring process.

In addition, Executive Director Serpa noted that July 19, 2026 was the Spirit of Massachusetts race day at Plainridge Park Casino ("PPC"). Director of Racing and Chief Veterinarian Alexandra Lightbown stated that PPC's racing staff did a good job preparing the track. She stated that the test barn and veterinarians doubled their testing and that the licensing team processed 40 licenses specific to this day. She noted that Chair Maynard and Commissioner O'Brien attended the event and presented the trophies.

4. [Legal Division](#) (17:56)

Prior to discussing legal matters, Chair Maynard stated that the Commission was addressing the discrete issue of simulcast license transfers that would apply to all current and future licensees. He stated that the items on the meeting's agenda did not pertain to any new products currently being considered and discussed by the Legislature.

a. 205 CMR 17.00 – Review of a Proposed Transfer of Interests in a Racing Meeting License – Emergency Adoption (19:09)

Chief Deputy General Counsel Justin Stempeck presented 205 CMR 17.00, a new regulation regarding transfers of interest in a racing meeting license, for emergency promulgation. He noted that the Commission was aware of an agreement by an entity to purchase the property and racing license of the Massasoit Greyhound Association d/b/a/ Raynham Park (“MGA”). Should a transfer occur, the hope is for the facility to be reopened. *The draft of 205 CMR 17.00 and the Small Business Impact Statement were included in the Commissioners’ Packet on pages 36 through 42.*

Commissioner Hill moved that the Commission approve the Small Business Impact Statement and the draft 205 CMR 17.00 as included in the Commissioners’ Packet and discussed here today, and further that staff be authorized to take the steps necessary to file the required documentation with the Secretary of the Commonwealth by emergency and thereafter to begin the regulation promulgation process relative to this regulation; and that staff shall be authorized to modify chapter or section numbers or titles, to file additional regulation sections as reserved, or to make any other administrative changes as necessary to execute the regulation promulgation process. Commissioner O’Brien seconded the motion.

Roll call vote:

Commissioner O’Brien: Aye.

Commissioner Hill: Aye.

Commissioner Skinner: Aye.

Commissioner Brodeur: Aye.

Chair Maynard: Aye.

The motion passed unanimously, 5-0.

b. Application for Greyhound Racing License Transfer (24:43)

Chief Stempeck presented the proposed application for a greyhound racing license transfer. *The proposed application for greyhound racing license transfer was included in the Commissioners’ Packet on pages 43 through 66.*

Commissioner O’Brien moved that the Commission approve the Application for Greyhound Racing License Transfer as included in the Commissioners’ Packet and discussed here today. Commissioner Brodeur seconded the motion.

Roll call vote:

Commissioner O’Brien: Aye.

Commissioner Hill: Aye.

Commissioner Skinner: Aye.

Commissioner Brodeur: Aye.

Chair Maynard: Aye.

The motion passed unanimously, 5-0.

c. Withdrawal of Massasoit Greyhound Association, Inc.’s Application for a Category 2 sports wagering license pursuant to 205 CMR 213 (27:08)

Chief Stempeck presented MGA’s request to withdraw its application for a category two sports wagering license. He noted that the MGA’s application was held open in the event that MGA was able to find a new sports wagering partner. *MGA’s request to withdraw its application for a category two sports wagering license was included in the Commissioners’ Packet on pages 67 through 69.*

Commissioner Hill moved that in accordance with 205 CMR 213.01(2), the Commission find that the Massasoit Greyhound Association has shown good cause to support the withdrawal of its category 2 sports wagering license application and that the Commission approve their Withdrawal Request as included in the Commissioners’ Packet and discussed here today. Commissioner O’Brien seconded the motion.

Roll call vote:

Commissioner O’Brien: Aye.

Commissioner Hill: Aye.

Commissioner Skinner: Aye.

Commissioner Brodeur: Aye.

Chair Maynard: Aye.

The motion passed unanimously, 5-0.

d. Withdrawal of Caesars Qualifiers’ Application as a Qualifier for Massasoit Greyhound Association, Inc.’s Category 2 sports wagering license pursuant to 205 CMR 213 (29:38)

Chief Stempeck explained that American Wagering Inc. d/b/a Caesars Entertainment (“Caesars”) was a pending qualifier related to MGA’s application for a sports wagering license. He noted that Caesars filed to withdraw from the process as a qualifier but that their request had not been acted upon and was pending the final outcome of MGA’s application. *Caesars’ request to withdraw as a qualifier was included in the Commissioners’ Packet on pages 70 through 71.*

Commissioner O’Brien moved that in accordance with 205 CMR 213.01(2), the Commission find that Caesars, and its related entity and individual qualifiers, have shown good cause for the withdrawal of its application as a Qualifier for the Massasoit Greyhound Association and that the Commission approve its Withdrawal Request as included in the Commissioners’ Packet and discussed here today. Commissioner Skinner seconded the motion.

Roll call vote:

Commissioner O’Brien: Aye.

Commissioner Hill: Aye.

Commissioner Skinner: Aye.

Commissioner Brodeur: Aye.

Chair Maynard: Aye.

The motion passed unanimously, 5-0.

e. [Request for Change of Address, Massasoit Greyhound Association, Inc.](#) (31:58)

Chief Stempeck presented MGA's request for a change of address. He explained that this discussion item was intended to provide notice to the Commission of MGA's change of address and required no vote. Chair Maynard acknowledged that the Commission received MGA's letter notifying the Commission of the address change. Commissioner Hill asked if the address was for the new building on MGA's property. Chief Stempeck confirmed that the address was for the new building on the same property. *MGA's request for a change of address was included in the Commissioners' Packet on pages 72 through 73.*

5. [Investigations and Enforcement Bureau](#) (34:23)

a. Review of Sports Wagering Operator Application Materials

Investigations and Enforcement Bureau ("IEB") Director Caitlin Monahan presented updates to the application materials for the sports wagering license application. *The updated application materials were included in the Commissioners' Packet on pages 74 through 186 and in the additional meeting materials document.*

Commissioner Brodeur noted that most of the changes were not substantive policy changes. Commissioner Skinner asked for more details regarding the changes in reporting amount thresholds. Director Monahan explained that the litigation reporting requirement in the Business Entity Disclosure form was increased to \$250,000 to be consistent with the Commission's regulations. Commissioner Skinner asked why the requirement for references was removed from the Massachusetts Supplemental form. Director Monahan stated that references were required by a different form making that requirement redundant.

Commissioner Hill moved that the Commission approve the updated Application for Category 1, 2, & 3 Sports Wagering Operator License and related forms included in the Commissioners' Packet and discussed here today. Commissioner Brodeur seconded the motion.

Roll call vote:

Commissioner O'Brien: Aye.

Commissioner Hill: Aye.

Commissioner Skinner: Aye.

Commissioner Brodeur: Aye.

Chair Maynard: Aye.

The motion passed unanimously, 5-0.

6. [Commissioner Updates](#) (49:27)

Chair Maynard asked if there were any Commissioner Updates and received no response.

7. [Other Business](#) (49:34)

Hearing no other business, Chair Maynard requested a motion to adjourn.

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

Roll call vote:

Commissioner O'Brien: Aye.

Commissioner Hill: Aye.

Commissioner Skinner: Aye.

Commissioner Brodeur: Aye.

Chair Maynard: Aye.

The motion passed unanimously, 5-0.

List of Documents and Other Items Used

1. [Notice of Meeting and Agenda dated July 20, 2026.](#)
2. [Commissioner's Packet from the July 22, 2026, meeting \(posted on massgaming.com\).](#)
3. [Additional Meeting Materials – Business Entity Disclosure Form.](#)



Massachusetts Gaming Commission Meeting Minutes

Date/Time: July 28, 2026, 10:00 a.m.

Place: Massachusetts Gaming Commission

VIA CONFERENCE CALL NUMBER: +1-213-631-9908

PHONE CONFERENCE ID: 426 049 432#

The Commission conducted this public meeting remotely utilizing collaboration technology. 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 Jordan Maynard

Commissioner Bradford Hill

Commissioner Nakisha Skinner

Commissioner Paul Brodeur

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

Chair Maynard called to order the 594th Public Meeting of the Massachusetts Gaming Commission ("Commission"). Roll call attendance was conducted, and Chair Maynard noted that Commissioner O'Brien was not available for this meeting.

2. [Meeting Minutes](#) (00:54)

The June 25, 2026 and July 1, 2026 public meeting minutes were included in the Commissioners' Packet on pages 4 through 12.

Commissioner Brodeur moved that the Commission approve the minutes from the public meeting held on June 25, 2026 and July 1, 2026 as included in the Commissioners' Packet and subject to discussion here today, subject to any revisions for typographical errors or other non-material matters. Commissioner Skinner seconded the motion.

Roll call vote:

Commissioner Hill: Aye.

Commissioner Skinner: Aye.

Commissioner Brodeur: Aye.

Chair Maynard: Aye.

The motion passed, 4-0.

3. Sports Wagering Division (01:47)

a. Category 1 Sports Wagering Operators' Request for Waiver from 205 CMR 254:
Temporary Prohibition from Sports Wagering

Compliance and Operations Manager Andrew Steffen explained that the Sports Wagering Division conducted a review and found potential ambiguity in 205 CMR 254 regarding whether the regulation applied to retail sports wagering. He stated that the Sports Wagering Division consulted each of the retail sports wagering operators and that each operator identified operational and technological limitations that prevented compliance with the requirements of 205 CMR 254. As such, the operators submitted waiver requests. *The operators' waiver requests were included in the Commissioners' Packet on pages 13 through 25.*

Manager Steffen noted that the Sports Wagering Division considered the possibility of an amendment to 205 CMR 254 but ultimately determined that waivers were the best approach at this time. He stated that the waivers could be revisited should technology advance to a point where the implementation of the temporary prohibition features outlined in the regulation could be added to retail operations. Commissioner Brodeur asked if the waivers were temporary. Manager Steffen explained that the waivers would be in place until such time as updated technology allowed compliance.

Commissioner Skinner moved that, in accordance with 205 CMR 102.03(4)(c) and 205 CMR 202.03(2), the Commission issue a waiver to Encore Boston Harbor, Plainridge Park Casino, and MGM Springfield from the requirements outlined in 205 CMR 254.00, as granting the waiver meets the requirements specified in 205 CMR 102.03(4) and is consistent with the purposes of G.L. c. 23K and G.L. c. 23N. Commissioner Hill Seconded the motion.

Roll call vote:

Commissioner Hill: Aye.

Commissioner Skinner: Aye.

Commissioner Brodeur: Aye.

Chair Maynard: Aye.

The motion passed, 4-0.

b. FanDuel Updates to House Rules (08:15)

Manager Steffen presented proposed House Rules updates for Betfair Interactive US, LLC d/b/a FanDuel ("FanDuel"). *FanDuel's updated House Rules were included in the Commissioners' Packet on pages 26 through 28.*

Commissioner Hill moved that the Commission approve the updates to Betfair Interactive US, LLC (d/b/a FanDuel)'s House Rules as included in the Commissioners' Packet and discussed here today. Commissioner Brodeur seconded the motion.

Roll call vote:

Commissioner Hill: Aye.

Commissioner Skinner: Aye.

Commissioner Brodeur: Aye.

Chair Maynard: Aye.

The motion passed, 4-0.

4. Investigations and Enforcement Bureau (10:27)

- a. Briefing on noncompliance matter related to Category 3 Sports Wagering Operator Caesars Sportsbook and discussion regarding next steps. Alleged noncompliance relates to offering wagering on an unapproved event in violation of 205 CMR 247.01(1), 205 CMR 247.01(2)(i), and the Massachusetts Sports Wagering Catalog.

Enforcement Counsel Diandra Franks presented a noncompliance matter related to Caesars Sportsbook (“Caesars”). The Commission reached a consensus to refer this matter back to the Investigations and Enforcement Bureau (“IEB”) for further investigation and a recommendation. *A memorandum with details regarding this noncompliance matter was included in the Commissioners’ Packet on page 29.*

- b. Briefing on noncompliance matter related to Category 1 Sports Wagering Operator Blue Tarp redevelopment, LLC d/b/a MGM Springfield and discussion regarding next steps. Alleged noncompliance relates to offering wagering on an unapproved event in violation of G.L. c. 23N, § 3, 205 CMR 247.01(1), 205 CMR 247.01(2)(i), and the Massachusetts Sports Wagering Catalog. (13:09)

Counsel Franks presented details regarding a noncompliance matter related to Blue Tarp reDevelopment, LLC d/b/a MGM Springfield (“MGM”) which involved wagering on the Heisman Trophy winner. *A memorandum with details regarding this noncompliance matter was included in the Commissioners’ Packet on page 29.*

Commissioner Skinner noted that the facts of this incident were similar to a previous noncompliance incident. Counsel Franks stated that another operator similarly offered wagering on the Heisman Trophy in prior years. The Commission reached a consensus to refer this matter back to the IEB for further investigation and a recommendation.

- c. Briefing on noncompliance matter related to Category 3 Sports Wagering Licensee BetMGM, LLC, d/b/a BetMGM (“BetMGM”) and discussion regarding next steps. Alleged noncompliance relates to BetMGM transmission of marketing materials to two individuals enrolled in the Voluntary Self-Exclusion program in violation of 205 CMR 233.06 and 205CMR 256.07 (15:58)

Enforcement Counsel Nathaniel Kennedy presented details regarding a noncompliance matter in which BetMGM, LLC d/b/a BetMGM sent advertising materials to individuals on the Voluntary Self-Exclusion (“VSE”) list. *A memorandum with details regarding this noncompliance matter was included in the Commissioners’ Packet on page 30.*

Commissioner Skinner sought additional details regarding the circumstances of this incident. Counsel Kennedy stated that BetMGM's marketing team used an automated marketing platform to ensure that digital communications were not sent to prohibited individuals. He noted that human error was involved where a customer relations manager inadvertently turned off the automatic system. Commissioner Skinner requested that the IEB present the next noncompliance incident involving BetMGM prior to the Commission making a decision.

d. Briefing on noncompliance matter related to Category 3 Sports Wagering Licensee BetMGM, LLC, d/b/a BetMGM ("BetMGM") and discussion regarding next steps. Alleged noncompliance relates to BetMGM transmission of marketing materials to two individuals enrolled in the Voluntary Self-Exclusion program in violation of 205 CMR 233.06 and 205CMR 256.07 (18:37)

Counsel Kennedy presented details regarding a noncompliance matter in which BetMGM sent physical advertising materials to two individuals on the VSE list. *A memorandum with details regarding this noncompliance matter was included in the Commissioners' Packet on page 30.*

Counsel Kennedy noted that physical mailers are sent based on a manual extraction process performed by BetMGM's Business Intelligence Team. He stated that the noncompliance occurred because when the marketing team received an extracted list of individuals to receive the mailer, they believed it was scrubbed of those who were not eligible to receive advertisements when rather the Business Intelligence Team believed the list would be run through BetMGM's automated marketing platform, which it was not. He stated that the two noncompliance incidents had different root causes, as one was electronic and the other was physical.

Chair Maynard asked if the issue arose from the same vendor. Counsel Kennedy stated that both incidents arose from BetMGM's internal marketing team and internal procedures for handling excluded individuals. Commissioner Brodeur asked if it was the same two individuals who received the electronic and physical communications. Counsel Kennedy noted that the matters involved separate individuals.

Noting that the Commission took the VSE program seriously, Commissioner Brodeur stated that he was comfortable referring this matter to the IEB for further investigation and a recommendation provided that any recommended sanction reflects that seriousness. Commissioner Skinner agreed with Commissioner Brodeur and asked that the IEB place an emphasis on remedial measures and corrective action during the investigation. The Commission reached a consensus to refer the two BetMGM matters back to the IEB for further investigation and a recommendation.

e. Briefing on noncompliance matter related to Category 3 Sports Wagering Licensee Penn Sports Interactive ("PSI") and discussion regarding next steps. Alleged noncompliance relates to PSI contacting an individual enrolled in a "cool-off" period in violation of 205 CMR 254.02(6) and 205 CMR 254.04 (22:46)

Enforcement Counsel Nathaniel Kennedy presented details regarding a noncompliance matter in which a PSI VIP hose contacted an individual in a “cool-off” period several times. *A memorandum with details regarding this noncompliance matter was included in the Commissioners’ Packet on page 30.*

Chair Maynard stated that given the facts of the situation, Commission review of this noncompliance incident at an adjudicatory hearing was appropriate. Commissioner Skinner agreed and stated that this matter would benefit from an adjudicatory hearing given the scrutiny the Commission has placed on VIP programs.

Commissioner Skinner sought clarification as to whether the IEB would be a party or a witness at the adjudicatory hearing. IEB Director Caitlin Monahan noted that the IEB had historically been a party in this type of proceeding. Chief Deputy General Counsel Justin Stempeck stated that the Commission previously discussed this process and recommended that the IEB act as a party while the Commission acts as factfinder. Commissioner Skinner stated that she supported moving forward with an adjudicatory hearing with the IEB as a party.

Commissioner Brodeur agreed with Commissioner Skinner. He noted that he viewed this incident as four violations rather than a single violation. Chair Maynard asked when the last violation occurred. Counsel Kennedy stated that the last point of contact was a text message on May 29, 2026. The Commission reached a consensus to have an adjudicatory hearing regarding this noncompliance matter.

5. Community Affairs Division (31:20)

Senior Program Manager Mary Thurlow presented two Block Grant Reallocation Requests from the City of Springfield. *The City of Springfield’s requests were included in the Commissioners’ Packet on pages 31 through 36.*

Commissioner Hill moved that the Commission approve the City of Springfield’s request to reallocate funds in the amount of \$250,000, originally granted in connection with its FY 2027 Block Grant for Main Street/Convention District Retail Recruitment Project, to fund the Central Mixed-use Parking Infrastructure Project funded in its FY 2027 Community Mitigation Fund Grant as included in the Commissioners’ Packet and discussed here today, and further moved that the Commission approve the City of Springfield’s request to reallocate FY 2026 funds in the amount of \$250,000, originally granted in connection with the Springfield Regional Visitors/Event Center project, to fund the Central Mixed-use Parking Infrastructure Project, as included in the Commissioners’ Packet and discussed here today. Commissioner Brodeur seconded the motion.

Roll call vote:

Commissioner Hill: Aye.

Commissioner Skinner: Aye.

Commissioner Brodeur: Aye.

Chair Maynard: Aye.

The motion passed, 4-0.

6. [Commissioner Updates](#) (36:28)

Chair Maynard asked if there were any Commissioner updates and received no response. He noted that Commissioner Brodeur would be chairing the upcoming agenda setting meeting on August 5, 2026.

7. [Other Business](#) (36:51)

Hearing no other business, Chair Maynard requested a motion to adjourn.

Commissioner Brodeur moved to adjourn. The motion was seconded by Commissioner Hill.

Roll call vote:

Commissioner Hill: Aye.

Commissioner Skinner: Aye.

Commissioner Brodeur: Aye.

Chair Maynard: Aye.

The motion passed, 4-0.

List of Documents and Other Items Used

1. [Revised Notice of Meeting and Agenda, dated July 24, 2026.](#)
2. [Commissioner's Packet from the July 28, 2026, meeting \(posted on \[massgaming.com\]\(https://massgaming.com\)\).](#)



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

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

CC: Dean Serpa, Executive Director

DATE: August 27, 2026

RE: Sports Betting Among Young Adults in Massachusetts

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 further expands this research agenda to encompass sports wagering.

To fulfill this broad statutory mandate, the Commission identified eight key areas of research: social, economic, public safety, the Massachusetts Gambling Impact Cohort study, data sharing, sports wagering, responsible gaming program evaluation, and community-engaged research. The objective of community-engaged research is to understand and address the impact of casino gambling and sports wagering in Massachusetts communities. The specific research topic or question is developed by the community through a community-driven process.

The Massachusetts Gaming Commission funded NORC at the University of Chicago, in partnership with Gemini Research, in 2023 to increase understanding of sports betting among young adults in Massachusetts. The study used a community-engaged research approach to understand the social and public health impacts of legalized sports betting among young adults ages 18 to 25 in Massachusetts.

Attached are the report and the presentation.



Massachusetts Gaming Commission

Sports Betting among Young Adults in Massachusetts:

Perspectives, Engagement, Impact, and Recommendations



Overview

The Massachusetts Gaming Commission funded NORC at the University of Chicago, in partnership with Gemini Research, to increase understanding of sports betting among young adults in Massachusetts.

The study used a community-engaged research approach to understand the social and public health impacts of legalized sports betting among young adults, ages 18 to 25.

Research Questions

- 1 How do young adults **perceive** and **engage** in sports betting?
- 2 How has legalization affected **awareness, attitudes, and behavior**?
- 3 What **policies** or **programs** can reduce harm and support well-being?

Research Methods



Community-engaged Qualitative Study (2023-2026):

Interviews and/or focus groups with:

- **62** young adults
- **12** sports betting vendors, policymakers, and researchers
- **6** athletic directors and mental health counselors



Community engagement:

- Engaged young adults and community members to serve as collaborators as part of a Community Advisory Board (CAB)
- Trained two young adults from the community to serve as interviewers
- Conducted participatory analysis with CAB members and community interviewers to interpret and validate key findings

Young Adult Participants:

62 young adults participated in interviews or focus groups:

- **71%** previously bet on sports.
- **66%** ages 21-25; **34%** 18-20.
- **56%** identify as female, **42%** as male, **2%** preferred not to answer.
- **63%** identify as White, **21%** as Asian, **8%** as Black or African American, **8%** as Hispanic or Latino.

Sports Betting among Young Adults in Massachusetts

Young Adult Sports Betting Views and Behaviors

VIEWS

Young adults hold ambivalent attitudes toward sports betting, viewing it as a socially acceptable activity with potential risk. While young adults acknowledged risk, they commonly viewed themselves and their peers as exempt from potential harms.

Sports betting is okay in moderation.

- ✓ Promotes social connectedness
- ✓ Increases engagement with sports
- ✓ Can generate income

Sports betting is harmful in excess.

- x Can cause financial loss
- x Can lead to addiction
- x Can create stress and relationship strain

"It's sinking a lot more money into a black hole than [young adults] would normally... that being said, it definitely does offer some interesting entertainment and social interactions, especially around watch parties for sports games."

BEHAVIORS

Most young adult participants shared engaging in sports betting infrequently, wagering less than \$10. A few shared betting more frequently and wagering more.

Young adult perceptions of their sports betting behavior:



Betting on sports is equivalent to "buying a coffee" or "going out to lunch."



Losses pose financial risk, create stress, and snowball when "chasing losses" to recoup.



Sports betting is a social activity that often occurs when consuming alcohol with friends.



Sports betting is easily accessible, normalized, and potentially addictive.

Young adults primarily bet on sports using online platforms and mobile apps.



Type of Bet

Moneyline bets were favored by young adults and perceived as straightforward and less risky when compared to prop bets or parlays.



Sportsbook Selection

Available promotions was a key factor for young adults when selecting a sportsbook. Other factors included recent advertisements and which had the "better line."

Sports Betting among Young Adults in Massachusetts

Sports Betting Normalization and Differential Experiences

NORMALIZATION

Young adults perceive sports betting as normalized among their peers and socially embedded in everyday life.

Young adults often discuss and engage in sports betting across social, academic, and work settings.

"[Sports betting] gives people something to talk about with their friends or it's a fun way to get to know people."



Mobile and Online Platforms have increased the accessibility, convenience, and availability of sports betting for young adults.



Gamification of sports betting has created distance from traditional forms of gambling and minimizes recognizable feelings of risk and loss.



Advertisements feel pervasive, and widespread promotional incentives further contribute to engagement. "Free money" and "bonus bets" promotions contribute to sports betting feeling "lower stakes" and more approachable for young adults.

DIFFERENTIAL EXPERIENCES



Underage (18-20 years old)

- Underage sports betting was perceived as common due to existing loopholes and workarounds.
- Early exposure may contribute to underage engagement.



Gender

- Men were viewed as more frequent bettors than women.
- However, recent advertisements and influencers are perceived to be targeting young women.



College Students

- College campus is a common point of entry for young adults with newfound autonomy.
- Sports betting conversations and engagement are prevalent among peers.



College Athletes

- College athlete participants emphasized the National Collegiate Athletic Association (NCAA) ban on sports betting prevents most from engaging.
- Many expressed concern over pressure and harassment for athletes.

Sports Betting among Young Adults in Massachusetts

Sports Betting Responsibility and Recommendations

Shared Responsibility for Harm Mitigation

 Participants viewed sports betting harm mitigation as a shared responsibility with responsible actors at multiple levels.



Participant Recommendations



Education & Awareness

Expand **financial literacy** and **gambling education** for young adults. Launch **public service announcements (PSAs)** modeled after anti-smoking campaigns.



Advertising & Messaging

Strengthen **regulations and restrictions** on sports betting advertisements to reduce their prevalence and influence.



Support Services

Increase **availability, visibility, and integration** of support services tailored for young adults. Adopt **amnesty policies and education** for collegiate athletes.



App-Based Safeguards

Integrate more prominent **opt-out warnings, disclaimers, limits, loss notifications, and tracking tools** within sports betting apps.



Policy & Regulation

Address existing **regulatory loopholes** that enable **underage betting**. Consider policy-based sports betting restrictions.



Research, Monitoring, & Evaluation

Continue to invest in **research, monitoring, and evaluation**, including quantitative, longitudinal, and equity-focused studies.

FINAL REPORT

July 2026

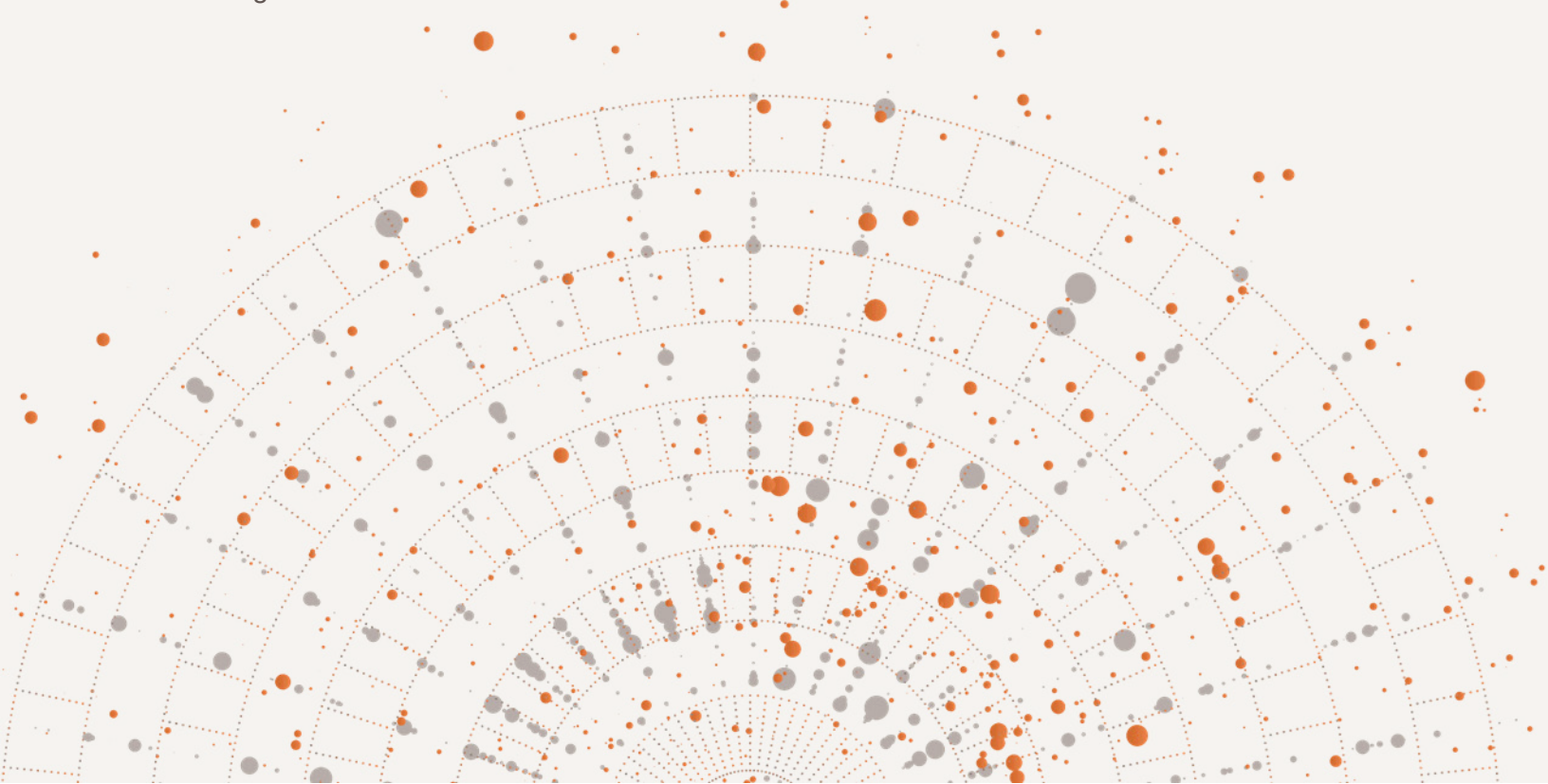
Perspectives on Sports Betting among Young Adults in Massachusetts: A Community-Engaged Research Study

Presented by:

NORC at the University of
Chicago

Presented to:

Massachusetts Gaming
Commission



NORC

Petry S. Ubri
Katie Gallant
Maya Ng-Yu
Jared Sawyer

with special acknowledgement of:

Jenna T. Sirkin
Christina Drymon
Alva Chavez
Samantha Augenbraun

Gemini Research

Rachel Volberg
Calyx Terrafen

Community Advisory Board Members

Anna DiGravio	Josh Garber
Anthony Sardak	Linh Ho
Benjamin Starr	Matthew Jodoin-Siegel
Erica McCummings	Stephanie Cadet
Frank Poon	Veronica Monserratt
Hugo Rengifo	Zachariya Ibrahim
Jacob Wallack	

Interviewers

We would also like to acknowledge the contributions and efforts of our community interviewers who attended training, recruited participants, conducted interviews, interpreted findings, and reviewed the final report. The interviewers also joined the CAB as part of Phase III of the study.

Yanqing Huang
Daniel Echeverría Cordoba

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Executive Summary

Massachusetts legalized sports betting in August 2022, and it became operational in early 2023. The rapid uptake of sports betting has prompted concerns about the potential impact on young adults. To better understand these effects, NORC at the University of Chicago (NORC), in partnership with Gemini Research and informed by a Community Advisory Board (CAB), conducted a community-engaged, multi-phase qualitative study from 2023 to 2026. The study explored young adults' perspectives, behaviors, and experiences with sports betting, as well as recommendations for mitigating potential harms. We completed the following activities:

- Engagement of CAB members across all study phases, including formative research, study design, data collection, and participatory analysis to interpret and contextualize study findings.
- Interviews with 39 young adults and focus groups with 23 young adults (ages 18-25) residing in Massachusetts to understand their experiences with and perspectives on sports betting, as well as perceived impacts of legalization on their lives.
- Interviews with 12 sports betting researchers, policymakers, and vendors (described as “Industry and policy interviewees” throughout this report) to inform study design and provide context on retail and online sports betting in Massachusetts.
- Interviews with six young adult support professionals, including College Counseling Center Directors, Athletic Directors, and mental health clinicians, to better understand the potential impacts of sports betting on young adults and inform recommendations to mitigate potential harms.

Overview of Key Findings

Patterns of Sports Betting Behavior Among Young Adults

Many young adults reported that they bet casually and infrequently, with increased engagement around major sporting events; few young adults noted betting more frequently. The majority of bets reported by young adults ranged from \$0.50 to \$10. Football and basketball were noted as the most popular sports for wagers among young adults, though some also bet on a wide variety of sports. The majority of young adults reported placing Moneyline bets because they perceive single-game bets as more straightforward and less risky than other bet types. Sports betting primarily occurred through online and mobile platforms, with DraftKings frequently cited as one of the main platforms. Several young adults noted using informal peer networks and bookies for sports betting before legalization or when underage, while a few mentioned betting on sports in person. Some young adults also engaged in other forms of related gambling, including fantasy sports, social sportsbooks, and prediction markets.

How Young Adults Perceive Sports Betting

Many young adults perceive sports betting positively as a low-risk, casual form of entertainment, equating it with making discretionary purchases like “*buying a coffee*” or “*going out to lunch*.” However, young adults commonly paired these positive descriptions of sports betting with qualifiers such as “*when done in moderation*” and within limits.

Young adults acknowledged potential risks associated with sports betting, including:

- **Sports betting as a social activity closely intertwined with drinking alcohol:** Some young adults described betting on sports in social settings involving alcohol, such as bars, noting that drinking increases the likelihood of placing riskier bets. Young adult support professionals similarly emphasized that alcohol use can impair judgment and increase impulsivity.
- **Financial impacts:** While many young adults acknowledged financial risks, most framed these impacts as short-term or limited. Some young adults described sports betting as risky and shared anecdotes of financial loss and the associated emotional consequences, including disappointment, frustration, and stress. A few young adults linked concealed betting behavior and financial loss to strain in personal relationships. Young adult support professionals and industry and policy interviewees also raised concerns about young adults’ financial literacy and money management skills.
- **Addiction:** Some young adults expressed concern that increased access, normalization, and advertising may contribute to addiction and problem gambling. A few noted that normalization of sports betting may make it harder to recognize harmful behavior or seek help. Young adult support professionals echoed these concerns, pointing to structural characteristics of sports betting that are associated with gambling addiction.

Although young adults recognized risks associated with sports betting, many downplayed them or exempted themselves and their peers from being affected. Several young adults described sports betting as “trivial” or questioned whether it should be considered gambling at all. Some attributed this perspective to the gamification of sports betting, which they felt distanced it from traditional forms of gambling and reduced perceived personal risk. Young adult support professionals echoed these concerns, cautioning that the framing of sports betting as entertainment, combined with its gamified design and instant accessibility, can delay recognition of problematic behavior.

Young adults also mentioned potential benefits from the legalization of sports betting, including:

- **Increased engagement in watching sports:** Many young adults noted that they are watching, talking about, and going to more sports because they have a financial investment and therefore a personal stake in the outcome of the games.
- **Enhanced consumer protections and state revenue:** A few young adults noted that sports betting was occurring in Massachusetts regardless of and prior to legalization, observing that legalization has led to established platforms for sports betting with greater oversight and regulation. A few young adults also highlighted the public benefits of tax revenue from sports

betting. Young adult support professionals and industry and policy interviewees echoed these benefits and highlighted the increased opportunities for education and resource dissemination.

Normalization of Sports Betting among Young Adults

Sports betting is widely perceived as normalized, driven by its ubiquity and social embeddedness. Young adults linked the normalization of sports betting to:

- **Social context and peer influence:** Young adults consistently described sports betting as a social activity that fosters shared conversation and camaraderie. They also noted that legalization has contributed to sports betting being viewed as increasingly common and socially accepted, especially among their peers. Word of mouth and peer influence have spread interest and generated participation. Young adults reported that their engagement is largely motivated by friends who place bets, while others noted that family dynamics also contribute to normalization and engagement.
- **Proliferation of mobile and online platforms that embed sports betting into everyday life:** Young adults pointed to the accessibility and convenience of online and mobile sports betting apps, which were widely described as “frictionless” and “immediate,” as contributing to its uptake among young adults. Young adult support professionals and industry and policy interviewees similarly believe that the convenience and ease of access of mobile apps increased the prevalence of sports betting among young adults.
- **Pervasive advertising and promotional incentives:** Many young adults described widespread exposure to sports betting advertisements across social media, podcasts, and sports broadcasts, noting that this ubiquity normalizes sports betting but can also detract from the enjoyment of sports. Promotional strategies framed as “free money” were perceived as “lower stakes” and more approachable, especially for young adults with limited disposable income, though some viewed these strategies as misleading. Young adults found sports betting advertising particularly appealing when it featured celebrities, influencers, comedians, and athletes. Although industry and policy interviewees noted that vendors are prohibited from targeting individuals under age 21 in their advertisements, young adults expressed concern about the impact of these ads on young audiences, including underage viewers.

Differential Experiences Across Groups of Young Adults

Experiences of sports betting vary across subgroups of young adults.

- **Underage young adults:** Underage young adults are engaging in sports betting through loopholes, despite age restrictions. Industry and policy interviewees noted that sports and sports betting have been deeply embedded in U.S. history and culture, likely leading young adults to be aware of and engage with sports betting even prior to legalization. Some young adults were unaware of the age restriction or assumed it was 18 and older. Young adult support professionals cautioned that early age exposure to sports betting contributes to continued engagement.

- **Young men and women:** Young adults believe that sports bettors are primarily young men, with most participants noting that young men are most likely to bet on sports. They also described sports betting advertisements as specifically appealing to young men. However, a few young adults noted that since legalization, more young women have begun betting on sports. Young female bettors reported being influenced to start betting by male friends, family, and significant others, as well as by advertisements. Young adult support professionals expressed concern that stigma around gambling for women may lead to increased risk and lower levels of detection.
- **College students and collegiate athletes:** Young adults shared high levels of exposure to and engagement with sports betting on college campuses, frequently noting how often they discuss and participate in online sports betting with their peers. This engagement was especially pronounced within “sports schools,” or colleges and universities with strong collegiate athletics programs. Many believed that college is a point of entry into sports betting and articulated that sports betting is highly visible, socially accepted, and encouraged by peers on campus. Young adults view prohibitions from the National Collegiate Athletic Association (NCAA) as a strong deterrent to sports betting for collegiate athletes. Despite this, some collegiate athletes acknowledged that some of their peers still place bets or did so after leaving athletics. Some young adults expressed concerns about increased pressure on collegiate athletes from sports betting and its impact on their well-being.

Opportunities to Mitigate Risks and Potential Harms of Sports Betting

Many young adults noted that they were not aware of resources for problem gambling, highlighting that they did not know where to go for help. Some young adults were aware of disclaimers and helplines, but questioned how helpful these resources are. Young adult support professionals noted that they lack training and resources for how to support young adults with problem gambling.

Young adults and young adult support professionals view responsibility for mitigating harms as shared across governments, systems, institutions, and individuals.

- **Government bodies:** Young adult support professionals and several young adults identified policymakers, MGC, and other regulatory bodies as central actors in harm mitigation, particularly given the state’s role in legalizing and overseeing sports betting. Several young adults compared sports betting to alcohol and tobacco, noting that the government has historically intervened to restrict advertising and communicate health risks.
- **Sportsbook operators:** Many young adults identified sportsbook vendors as bearing substantial responsibility for harm mitigation given their role in designing, marketing, and profiting from sports betting. They suggested vendor-led interventions, including betting limits, loss-based financial cutoffs, time limits within apps, and clearer disclosures about spending. They also recommended mandatory in-app warnings, helplines, and disclaimers, especially after prolonged use or significant losses, like cigarette package warning labels. However, both young adults and professionals expressed skepticism about the effectiveness of sportsbook operator self-regulation.

- **Colleges and universities:** Young adult support professionals and young adults identified colleges and universities as important settings for harm mitigation, citing their access to young adults and capacity to support early awareness, education, referrals, and open conversations about gambling risks. However, several young adult support professionals acknowledged that power dynamics, concerns about mandatory reporting, or fear of NCAA-related consequences may discourage students from openly discussing their sports betting habits. Participants described more formal educational efforts, including mandatory training, workshops, seminars, and integration of sports betting topics into curricula. Several young adults emphasized the value of peer-led approaches, suggesting that hearing from other young adults or athletes who have experienced gambling-related harms would resonate with their peers.
- **Sports organizations:** Some young adults suggested that professional sports organizations and their governing bodies could play a role in mitigating harassment, particularly within college sports. Industry and policy interviewees and young adult support professionals described differing views on the enforcement of NCAA rules for collegiate athletes. The industry and policy interviewees suggested having stricter enforcement of NCAA policies prohibiting collegiate athletes from engaging in sports betting, particularly in Division II and III programs. In contrast, young adult support professionals described the need for amnesty rather than a solely punitive or zero-tolerance framework.
- **Individuals:** A few young adults and young adult support professionals emphasized individual responsibility, framing sports betting as a personal choice that requires self-regulation. A few young adults noted that individuals must ultimately set limits, budget appropriately, and recognize when betting ceases to be recreational.

Young adults, industry and policy interviewees, and young adult support professionals proposed strategies to reduce the negative impacts of sports betting, including:

- **Education & Awareness Raising:** Develop financial literacy programs that include content on gambling; create mini-courses for colleges about gambling, similar to required courses on substance use; and promote FAQs and resources on apps and websites and across campus.
- **Policy & Regulation:** Ban or restrict sports betting done online or through mobile applications, limit betting to in-person venues; raise minimum age for sports betting (e.g., to 25); and enforce NCAA rules more strictly for student athletes, or alternatively create amnesty policies and enact harm reductionⁱ approaches for collegiate athletes who engage in sports betting.
- **Advertising & Messaging:** Launch public service announcements (PSAs) similar to anti-smoking campaigns; include risks and available resources clearly in betting ads; restrict ads during sports events; and ban gambling content on streaming platforms like YouTube.

ⁱ According to the NCAA, “harm-reduction strategies foster prevention, risk reduction and health promotion. Harm-reduction strategies acknowledge actual behaviors (e.g., some student-athletes do bet on sports) and attempt to meet individuals where they are.” See [link](#) for more information.

- **Support Services:** Expand access to counseling and support groups; promote available support services in advertisements and on betting apps; and include links to helpful resources directly in betting apps.
- **App-Based Safeguards:** Add warnings and disclaimers before bets; implement loss and bet limits and time limits; trigger notifications when users reach designated loss thresholds; provide unprompted access to self-help resources within apps; and provide historical accounting or dashboards of weekly or monthly spending.
- **Research & Evaluation:** Fund independent studies on sports betting impacts; evaluate the cost-benefit of legalization; and use findings to inform policy and public education.

Discussion and Recommendations

In sum, young adults' engagement with sports betting is shaped by perceptions of low risk and high personal control. The normalization of sports betting, driven by post-legalization advertising, accessibility, and peer influence, reinforces these perceptions and supports ongoing engagement. Young adults shared perceptions of underage engagement in sports betting, both informally through peer networks and formally through loopholes. Although young adults discussed multiple risky behaviors associated with sports betting (e.g., financial loss, impulsivity, and addiction) that align with the Diagnostic and Statistical Manual of Mental Disorders, 5th Edition (DSM-5) criteria for gambling disorder, they rarely expressed concern about their own risk, instead viewing problem gambling as something that exclusively impacts others. While the discussion of broader mental health consequences from sports betting was limited, young adult support professionals reported feeling underprepared to address sports betting risk, citing insufficient training, resources, or support.

Given these findings, NORC recommends the following:

- Strengthen statewide education and public awareness on gambling harms
- Regulate sports betting advertising and promotions
- Strengthen app-based safeguards using opt-out defaults
- Expand access to and awareness of gambling-specific support services for young adults
- Address underage sports betting and regulatory loopholes
- Adopt harm reduction approaches for collegiate athletes who engage in sports betting
- Invest in ongoing research, monitoring, and evaluation to inform sports betting policies and programs

Conclusion

This study provides an in-depth exploration of young adults' perspectives on the legalization of sports betting in Massachusetts, highlighting how rapidly sports betting has become integrated into young adult culture. While many young adults view sports betting as benign or even beneficial, these findings raise important concerns about normalization, underestimated risk, and limited recognition of potential harms. This underscores the need for proactive and prevention-oriented approaches to mitigate gambling-related harms among young adults. As sports betting increasingly becomes embedded in everyday life, it is critical to ensure that policies, programs, and interventions are in place to protect young adults' well-being. Policymakers, regulators, educational institutions, and industry stakeholders should prioritize early education, responsible marketing and advertising, and accessible and tailored supports, with a particular focus on reaching young adults who are most vulnerable to targeted marketing and financial risks.

Glossary

Term	Definition
Betting pools	Betting pools involve combining all wagers of a certain type (e.g. all bets placed on the winning horse in a race). A small percentage is typically removed before the winnings are distributed to those in the pool.
CIRTification	CIRTification is a human research protections training program tailored to the unique roles of community research partners. The training is overseen by the University of Illinois Chicago Center for Clinical and Translation Science. For more information, see: https://ccts.uic.edu/resources/cirtification/ .
Encore Community Perspectives Study	The Encore research project was a qualitative research study conducted by NORC and partners to capture community perspectives on how Encore has affected the day-to-day quality of life of people in the Casino's surrounding communities.
Exclude-one-exclude-all policy	This policy refers to when a bettor voluntarily excludes themselves from one betting platform owned by a gaming company, they are then unable to bet on any other platforms or physical properties owned by that same company. The self-exclusion request is applied across a company's entire network, not just the single site where the initial request was made.
Express bets and parlays	Express bets and parlays both describe the combination of single bets and are used interchangeably in this report. See link for more information: https://legalbet.com/betting-school/types-of-sports-betting/ .
Fantasy sports (without monetary prizes)	There are platforms that allow players to participate in fantasy sports betting with no monetary prizes offered. These sites include traditional season-long fantasy platforms, daily fantasy sports sites, or sports betting simulation apps.
Fliff	Fliff is considered a "social sportsbook" where individuals do not play with actual money, but instead with virtual coins. According to a CAB member, Fliff can be downloaded in Massachusetts and operates using geofencing. Therefore, it is only available for download in states in which sports betting is legal.
Kalshi and Polymarket	Kalshi and Polymarket are web-based prediction markets that allow users to buy and sell shares for the outcome of future events, such as elections, economic data, sports, or popular culture events.
Peer-to-peer betting	"Peer-to-peer" betting is typically facilitated through an online platform that matches bettors with opposing views. A small commission is typically taken from the winning side of the wager.

Term	Definition
PlayWell (formerly GameSense)	PlayWell (formerly GameSense) is a responsible gaming program that encourages individuals who choose to gamble to adopt and/or maintain positive behaviors and attitudes that reduce the risk of gambling-related harm. The program offers tips on responsible gaming, tools, advice, and referrals, as necessary.
PrizePicks	PrizePicks operates legally in Massachusetts, offering peer-to-peer pick'em contests rather than traditional against-the-house prop bets.
Stake	Stake is an online sports betting and casino platform that allows players to gamble with cryptocurrency. The company pays Twitter/X users to watermark the Stake logo on viral memes and other posts. Despite community notes that notify X users that the post has an undisclosed gambling ad, memes with the Stake logo continue to be widely posted.
Super Bowl Squares	Super Bowl Squares refers to when participants buy squares and win cash based on the last digit of each team's score at the end of each quarter. Numbers 0–9 are randomly assigned to rows and columns for each team, making it a game of chance where winners hold the intersection of the correct digits.

Final Report

Introduction

As of 2023, individuals 21 and older physically located in Massachusetts can wager on most professional sports leagues. Currently, three retail locations and seven online platforms have licenses to accept sports bets in Massachusetts.¹

Accompanying the ongoing expansion of sports betting in the U.S. are concerns over related increases in gambling-related harms, specifically among young adults. In response, the Massachusetts Gaming Commission (MGC), the entity responsible for overseeing the establishment and regulation of the Commonwealth's sports betting industry, is constructing a regulatory structure to manage this new form of gambling.

NORC at the University of Chicago (NORC), in partnership with Gemini Research and a Community Advisory Board (CAB), received funding from the MGC in 2023 to conduct a study examining perspectives on the health and social impacts of the legalization of sports betting on young adults, ages 18-25, residing in Massachusetts. NORC worked with the CAB, which informed the study design, implementation, analysis, and dissemination, to conduct a multi-phase qualitative research study. The integration of the CAB and culturally responsive research methods, such as participatory principles and community engagement, ensured integration of diverse perspectives.

This study examined the following research questions:

- What are young adults' perspectives on sports betting?
- How are young adults engaging in sports betting?
- What factors influence young adults' engagement with sports betting?
- How has legalized sports betting affected young adults in Massachusetts, for example, social, economic, and well-being impacts of the legalization of sports betting?
- What policies or programs may mitigate the negative effects of or support the well-being of young adults who bet on sports?

This study fills an important gap in the literature by examining and contextualizing perspectives on and the impacts of sports betting on young adults in Massachusetts. Our research approach acknowledges that gambling-related harms impact not only individuals but the community at large, and therefore incorporates the perspectives of individuals who live and work in the community in addition to young adults.

Background

Following the landmark 2018 Supreme Court decision to end the federal ban on sports betting, both online and retail sports betting has been legalized in 30 states, including Massachusetts in 2023. The Commonwealth of Massachusetts Legislature passed an Act to Regulate Sports Wagering, which former Governor Charlie Baker signed into law in August 2022.² This legislation allows for up to 15 sports betting licenses in the Commonwealth, with eight tied to retail land-based partners (three licensed casinos and two racetracks) and the remaining seven online licenses open to competitive bidding. Three retail sites launched on January 31, 2023, and six online operators launched in early March 2023.^{1,3}

Sports betting has rapidly expanded in the U.S. In Massachusetts, the total amount bet on sports in 2025 was \$8.5 billion, with 98.6% of bets placed online, an average of \$710 million per month, and a 31% increase in the amount bet from December 2023 to December 2025.⁴ This rapid growth in sports betting is accompanied by the understanding that young adults have the highest participation rates and are predisposed to problem gambling compared to the general population.⁵ A 2023 National Collegiate Athletic Association (NCAA) study of 18- to 22-year-olds found that 58% of participants reported previously betting on sports.⁶ Similarly, a 2024 NCAA survey found that 22% of 18- to 20-year-olds and 21% of male collegiate athletes aged 21 or older had placed bets on sports in the past year.⁷ The effects of sports betting on young adults are wide-ranging, including worsened mental health and co-occurrence with problem gambling.⁵

Recent sports betting scandals within both collegiate and professional sports have also underscored growing concerns about this booming industry.^{8,9} In recent years, there have been federal investigations, arrests, and the discovery of illegal betting rings, all related to the use of insider information to manipulate games. These incidents also coincide with regulatory instability, including the NCAA's brief rule change in October 2025 to allow collegiate athletes and staff to bet on professional sports.¹⁰ This decision was rescinded within the month, but added uncertainty to NCAA rulings. At the same time, the rapid rise of prediction markets, which may be attributable to underage and young adult bettors, has paved the way for loosely regulated online betting. These platforms serve as loopholes for individuals under 21 to bet on sports and are increasingly targeting female bettors.¹¹ All these developments align with survey data from the Harris Poll in early 2026, which revealed that one-third of adults aged 21-44 bet on sports before turning 21. Early exposure, ambiguous regulations, weak safeguards, targeted marketing, and the normalization of sports betting all contribute to risk for young adults.

Despite growing concern and ongoing expansion, current research is limited, especially among young adults in Massachusetts.¹²⁻¹⁴ Among the limited research, a Social and Economic Impacts of Gambling in Massachusetts (SEIGMA) study highlighted increasing participation in sports betting among Massachusetts bettors ages 25-34 between 2013 and 2022, increasing popularity of sports betting among young and well-educated men, and that sports betting operators are increasingly targeting young women.¹⁵ A separate SEIGMA report found that when compared to other forms of gambling, sports bettors in Massachusetts gambled more, indicating a higher risk of gambling harms due to sports betting.¹⁶ Existing reports published by the MGC investigated developments in internet gambling and

daily fantasy sports;^{17,18} reviewed potential frameworks for regulating sports betting in Massachusetts;¹⁹ assessed the status of legalized sports betting in the US;²⁰ and made recommendations for measures to ensure that sports betting in Massachusetts will be conducted in a manner that minimizes harm.²¹

While states generally regulate how sportsbooks can operate, operators have significant latitude over the content and placement of their advertisements. The legalization of sports betting in Massachusetts has been accompanied by a rapid shift to digital advertising, where young adult exposure and persuasiveness are higher.^{22–25} In particular, there has been a rise in organic, non-paid social media advertising and the promotion of sports betting through influencers and celebrities who appeal to young adults.^{26–28} The 2023 national NCAA study reported that 56% of young adults aged 18-22 had recently seen or heard advertisements encouraging them to engage in sports betting at a casino, sportsbook, or via a mobile app or website.⁶ Of these, 53% reported being more likely to engage in sports betting after seeing or hearing an advertisement.

Taken together, the rapidly evolving legal and social landscape of sports betting underscores the need to understand how legalization is impacting young adults in Massachusetts. Existing research has mainly consisted of population-level surveys or administrative data, which offer limited insight into the lived experiences or social contexts of young adult sports betting. This study fills an important gap by centering the perspectives of young adults, industry and policy interviewees, and support professionals. Through focus groups and interviews, participants discussed perceptions of risk, pathways into sports betting, and recommendations for mitigating harm. Young adults are faced with high levels of exposure to advertising, social pressures, and highly accessible mobile platforms, in addition to increased vulnerability for gambling-related harms due to their developmental stage. By examining how young adults perceive, engage with, and navigate legalized sports betting, this study aims to inform prevention efforts, policy and regulatory decisions, and harm mitigation strategies that are responsive to the realities of young adult sports betting.

Methods

This study used a multi-phase, qualitative, community-engaged research approach to examine perspectives on the health and social impacts of legalized sports betting among young adults ages 18-25 residing in Massachusetts. The study consisted of three phases (**Exhibit 1**):

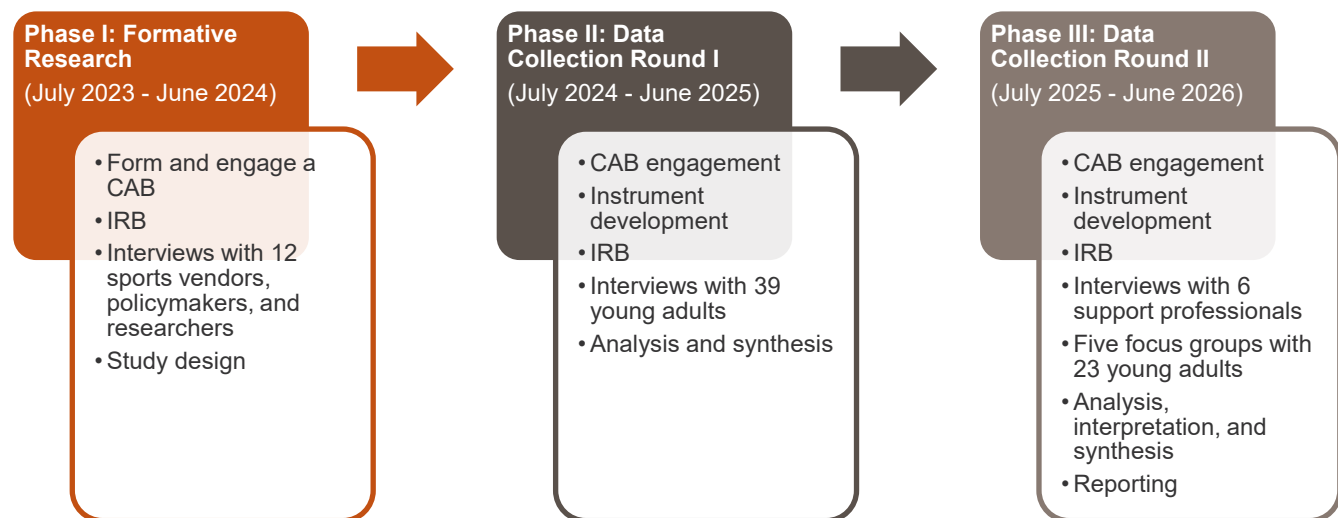
- **Phase I: Formative Research and Study Design (July 2023 – June 2024):** Formative research with CAB members and 12 interviews with sports betting vendors, policymakers, and researchers (i.e. industry and policy interviewees) to understand the current landscape and status of implementation of legalized sports betting in the state, and assess contextual factors shaping implementation and market engagement, particularly among young adults. Findings informed study design.
- **Phase II: Cross-Cutting Young Adult Perspectives (July 2024 – June 2025):** Interviews with 39 young adults, aged 18-25 and residing in Massachusetts, to understand their perspectives on the current context of sports betting for young adults in the state. Findings also informed groups of

interest (e.g., collegiate athletes and non-college students) and topics of focus (e.g., advertising) for Phase III data collection.

- **Phase III: In-Depth Subgroup Insights and Implications (July 2025 – June 2026):** Interviews with six young adult support professionals and five focus groups with 23 young adults to gather more data about the potential impact of sports betting on young adults, based on key themes and gaps from Phases I and II. Data collection included insights into recommendations for mitigating potential harms.

Underlying each phase of the study was NORC's engagement of the CAB to inform study design, data collection, and interpretation of findings.

Exhibit 1. Research Design, by Phase



Community Engagement

Throughout all phases of this study, NORC engaged with a CAB of 15 members, ranging from young adults to community members with an interest or expertise in young adult sports betting. Engaging the CAB in the research process and capturing the voices of young adults who are currently underrepresented were critical to fully understanding how the legalization of sports betting has affected young adults. Capturing CAB perspectives through processes for meaningful feedback at each phase informed the questions asked and the quality of the data collected on young adults' experiences and recommendations for policymaking on sports betting.

Throughout all three phases, this project leveraged NORC's Community-Engaged Research Framework (**Exhibit 2**),²⁹ informed by the CDC's Culturally Responsive Evaluation Framework and other community engagement frameworks, to guide CAB engagement.³⁰ The community-engaged research approach was critical to the long-term sustainability, equitable distribution of benefits, and the productivity of all informed interventions arising from the findings.^{31,32} Through equitable, trusting

partnerships, community-engaged research regularly amplifies the voices of community members as experts in their own experiences and communities.³³

Exhibit 2. Community-Engaged Research Framework



Adapted from the CDC's Culturally Responsive Evaluation Framework and based on principles adapted from various frameworks for community-engaged research.

The framework focuses on developing non-transactional partnerships with communities, a commitment to doing “no harm,” and prioritizing attention to authentic engagement in research to address community needs and promote well-being and health equity. Establishing a CAB at the beginning of the project for input on the research design and implementation process provides community members with opportunities to share their experiences through various methods (e.g., meetings, community discussions, asynchronous engagement) and ensures that the study continuously reflects and prioritizes local needs and concerns.³⁴

CAB Membership

NORC recruited 15 CAB members, including community advocates, students, organization representatives, community leaders, and community members. To recruit members for the CAB, NORC conducted outreach to 20 university contacts, young adult-serving and young adult-led organizations, behavioral health and social service organizations, and CAB members who previously participated in the Encore Community Perspectives Study. Research experience was not required for CAB participation, and we encouraged individuals from diverse professions, perspectives, and languages to join. We identified and recruited CAB members by developing and distributing flyers that outlined the research, CAB responsibilities, time commitment, compensation, and contact information (**Appendix A**). NORC provided each CAB member with a \$150 gift card for each meeting.

Individuals interested in becoming a CAB member completed a short screener that collected demographic information and initial perspectives on the legalization of sports betting in Massachusetts. Two community member interviewers joined the CAB in Phase III of the study, and one additional CAB member joined in 2026 via a NORC colleague's referral. Among 12 CAB members that completed the screener, six CAB members were from the Northeast region of the state, eight were full- or part-time students, seven were aged 25 or younger, and eight were male (**Exhibit 3**).

Community Advisory Board Member Affiliations

- Undergraduates at Brandeis University and Boston University
- Master's students at Tufts University and Boston College
- Youth coordinator at Boston Chinatown Neighborhood Center
- Data analyst at FanDuel
- Financial coordinator at MIT
- Dean at Roxbury Community College
- Leader at Civic Education Alliance
- Employee at GameSense

Exhibit 3. CAB Demographics, Employment, and Student Status

Characteristics	Number	Percent
Massachusetts Region		
Northeast	6	50%
Southeast	5	42%
Western	1	8%
Race/Ethnicity		
Asian	2	17%
Black	2	17%
White	6	50%
Hispanic/Latinx	2	17%
Gender		
Female	4	33%
Male	8	67%
Age		
18-21	5	42%
22-25	2	17%
26-39	2	17%
40+	3	25%
Employment Status		
Full-Time	5	42%
Part-Time	2	17%
Not Working	5	42%

Characteristics	Number	Percent
School Enrollment		
Full-Time	5	42%
Part-Time	1	8%
Not enrolled	6	50%

Data collected via a survey of 12 out of 15 CAB members on their agreement with statements about how the legalization of sports betting in Massachusetts affects young adults.

Throughout all phases of the study, NORC convened the CAB for review and feedback in the development of data collection instruments and protocols. The CAB also engaged with the analysis of study findings and contributed to the development of recommendations. All CAB meetings were scheduled in advance and held virtually to maximize ease of participation. For those unable to attend meetings, asynchronous feedback opportunities were provided.

Data Collection

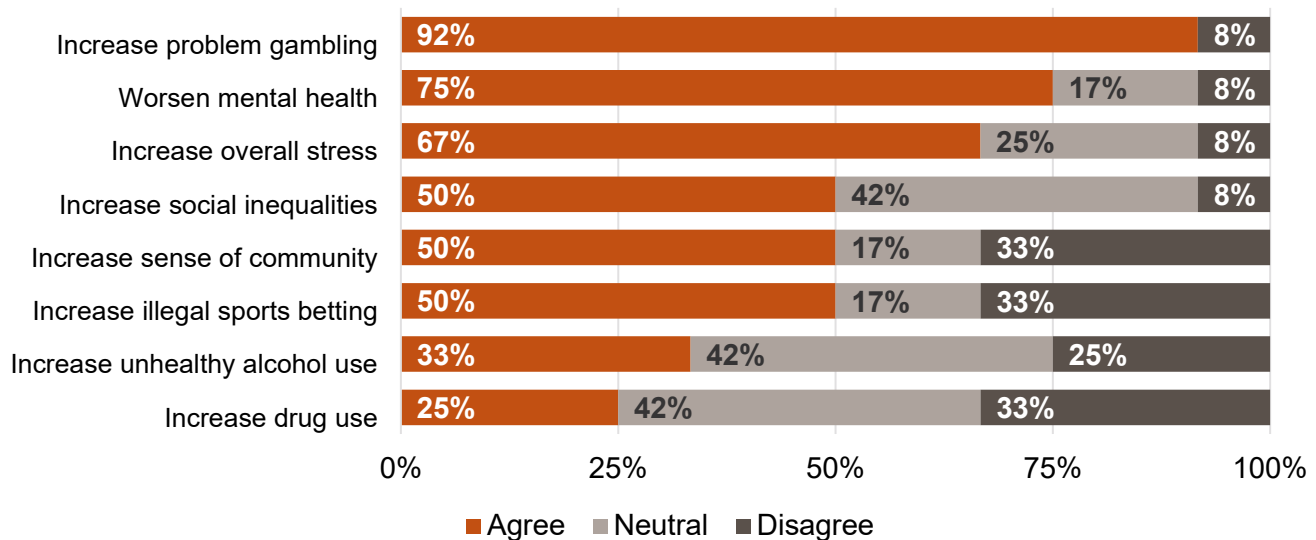
This section provides detailed methods by research phase.

Phase I: Formative Research and Study Design (July 2023-2024)

Phase I (2023-2024) consisted of assessing CAB perspectives on sports betting and conducting interviews with sports vendors, researchers, and policymakers.

CAB Perspectives

Individuals interested in becoming a CAB member completed a short screener that collected demographic information and perspectives on the legalization of sports betting in Massachusetts. **Exhibit 4** summarizes findings on 12 CAB members’ perspectives on the legalization of sports betting in Massachusetts. Overall, CAB members agreed or strongly agreed that sports betting can increase problem gambling (92%), worsen mental health (75%), and increase overall stress levels (67%). In addition, 83% of CAB members thought the legalization of sports betting would increase other forms of legal betting among 18-to 20-year-olds, and 67% thought it would decrease the perceived risks of sports betting. Finally, half of the CAB members believed that the legalization of sports betting would result in increasing social connections and a sense of community, as well as expanding social inequalities among low-income and marginalized groups.

Exhibit 4. CAB Perspective and Attitudes on Sports Betting**Sports betting can...**

Data collected via a survey of 12 out of 15 CAB members on their agreement with statements about how the legalization of sports betting in Massachusetts affects young adults.

During CAB meetings, CAB members provided input into the study design and data collection instruments. They recommended using ‘sports betting’ instead of ‘sports wagering’ among other updates to increase the salience of data collection instruments with young adults. They suggested that interviews with young adults assess the following, among other topics: how much young adults are gambling and how much they are spending; how young adults got involved in sports betting; the importance of influence from celebrities and social media; connection between fantasy leagues and sports betting; the influence of advertisements and other incentives; which sports people are more likely to bet on; if/how young adults engaged in sports betting prior to legalization; whether or not they are interested in/follow sports; rather than asking about problem gambling, ask about the components that make up problem gambling; asking about positive or negative effects of legalized sports betting.

Interviews with Sports Betting Policymakers, Vendors, and Researchers

NORC conducted 12 semi-structured virtual interviews, from January to April 2024, with state-based advocacy and consumer protection organizations (i.e., policymakers), sports betting vendors with active licenses in the state, individuals serving young adults (e.g., post-secondary education administrators), and research organizations with subject matter expertise on sports betting’s potential impacts on young adults broadly. The interviews provided insight into the current landscape and status of implementation of legalized sports betting in Massachusetts, as well as contextual factors shaping implementation and market engagement, particularly among young adults. These industry and policy interviewees noted the importance of understanding the social, economic, and health impacts of legalized sports betting on young adults in Massachusetts.

Interview Guide. NORC worked closely with the CAB and MGC to develop a semi-structured interview guide (**Appendix E**). The guide focused on the following topics:

- Current context of sports betting (both locally and at the regional and national level, and including historical market patterns, advertising, and young adult participation in betting).
- Implementation of sports betting (including the types and impact of advertising strategies currently being utilized, early observations about changes in betting market participation and patterns of betting, and differences from other forms of gambling).
- Strategies that parties central to implementation (i.e., vendors, regulators, service providers) have taken to mitigate potential harms for young adults (including underage betting).
- Opportunities and recommendations for market oversight and mitigation of harms.

Recruitment. NORC worked with the MGC and CAB members to identify interview participants. NORC first worked with the CAB to develop and validate a list of respondent types for recruitment (e.g., policymakers, vendors, researchers, service providers). Then, NORC created an outreach approach for the interviews, drawing upon MGC, CAB, and public websites for contact information. NORC recruited a mix of local and national perspectives; a summary of respondent types is shown in **Exhibit 5** below. NORC contacted 20 individuals, 12 of whom participated (60% response rate).

Exhibit 5. Characteristics of Industry and Policy Interviewees

Respondent Type	Number	Percent
Sports Betting Policymaker	2	17%
Sports Betting Vendor, Actively Licensed in MA	7	58%
Young Adult-Serving Provider/Researcher	3	25%
Total	12	

Phase II: Cross-Cutting Young Adult Perspectives (July 2024-June 2025)

Phase II (2024-2025) consisted of conducting 39 30-minute, semi-structured virtual interviews with young adults aged 18-25 residing in Massachusetts from November 2024 to March 2025.

Interviews with Young Adults

Interview Guide. NORC and the CAB co-designed an interview guide to gather perspectives from young adults on the current context of sports betting for young adults in Massachusetts since legalization, the role of advertising, the impact of legalization, current mitigation strategies, and experiences with sports betting. NORC drafted a semi-structured interview guide based on CAB feedback on priority topics, findings from the industry and policy interviewees, study research aims,

and existing literature. In addition to feedback on the research domains, the CAB provided feedback on question framing and exact wording to ensure salience with young adults.

NORC and the CAB discussed sports betting among young adults in the 18-to-20-year-old range who cannot legally participate in sports betting. The CAB highlighted the need to include 18-to-20-year-olds in the study due to the age group's vulnerability, as well as the understanding that this age group is, and has been, engaging in sports betting in Massachusetts regardless of legality. Discussion then centered on how to avoid asking interview questions that might require self-incrimination for illegal activities. As a result of CAB input, an adapted interview guide was developed for 18-to-20-year-olds that avoided self-implication.

NORC piloted a draft of the interview guide with two young adult members of the CAB to ensure it was salient, comprehensive, flowed as designed, and used accurate terminology. Findings from the pilot informed updates made to the interview guide.

The final guide focused on the following topics (**Appendix F**):

- Current context of sports betting (both locally and at the regional and national level, and including historical market patterns, advertising, and young adult participation in betting).
- Implementation of sports betting (including the types and impact of advertising strategies currently being utilized, early observations about changes in betting market participation and patterns of betting, and differences from other forms of gambling).
- Strategies that parties central to implementation (i.e., vendors, regulators, service providers) have taken to mitigate potential harms for young adults (including underage betting).
- Additional opportunities or recommendations for further market oversight and mitigation of harms.

The guides were available in Spanish, Portuguese, and Chinese. NORC and the CAB reviewed translations for accuracy, accessibility, and correct interpretation.

Interviewer Recruitment and Training. To support nuanced data collection, NORC recruited two young adult community interviewers to lead interviews with young adults. Prior to their first interview, community interviewers received a 90-minute training session to deepen their understanding of the interview consent process, bolster their comfort with conducting semi-structured interviews, and increase familiarity with the interview guide. In addition to this virtual training, community interviewers were required to complete CIRTification human-subject research training. NORC compensated community member interviewers for all time spent, including training completion, interview conduct, and participation in participatory analysis and sensemaking.

Participant Recruitment. NORC recruited young adults aged 18-25 living in Massachusetts through several mechanisms. NORC initiated recruitment by reaching out to the networks of CAB members and community interviewers. NORC, the CAB, and MGC identified 99 organizations and individuals associated with young adults or sports betting. These contacts included university professors, community organizations, athletic groups, and fraternities. Each distinct outreach attempt was

accompanied by a unique Qualtrics URL to enable source tracking and isolate high-fraud locations, as organizations were invited to share the incentivized interview opportunity with their networks, including through social media posts. Nineteen participants were recruited via these outreach efforts. Prior sports betting experience was not required for participation.

NORC also paid for social media advertisements on Facebook and Instagram to increase recruitment reach. However, only fraudulent respondents answered the social media advertisements after weeks of fielding. To ensure adequate recruitment across all regions of Massachusetts and to combat a high volume of fraudulent respondents, NORC contracted with PRC Global Market Research (PRC), a market research firm, to supplement recruitment. An additional 20 participants were recruited through these efforts.

In total, 39 young adults participated in interviews (**Exhibit 6**) and lived across Massachusetts (**Exhibit 7**). Only English-speaking young adults participated in the study. All young adults received a \$25 electronic gift card upon completing their interview.

Exhibit 6. Young Adult Participants (n=39)

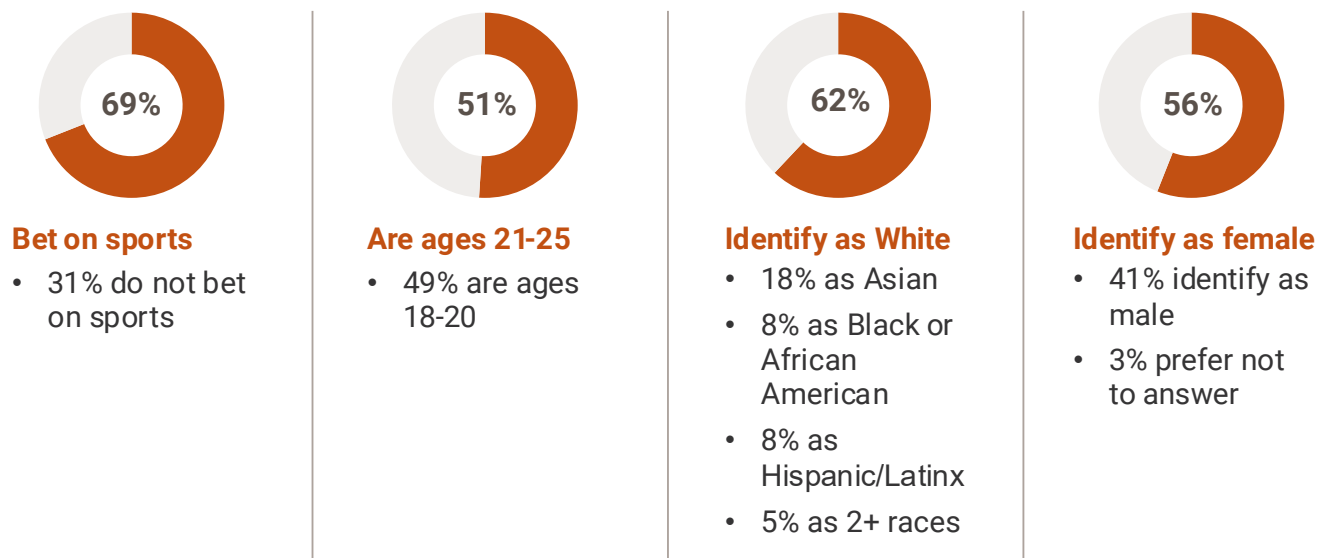
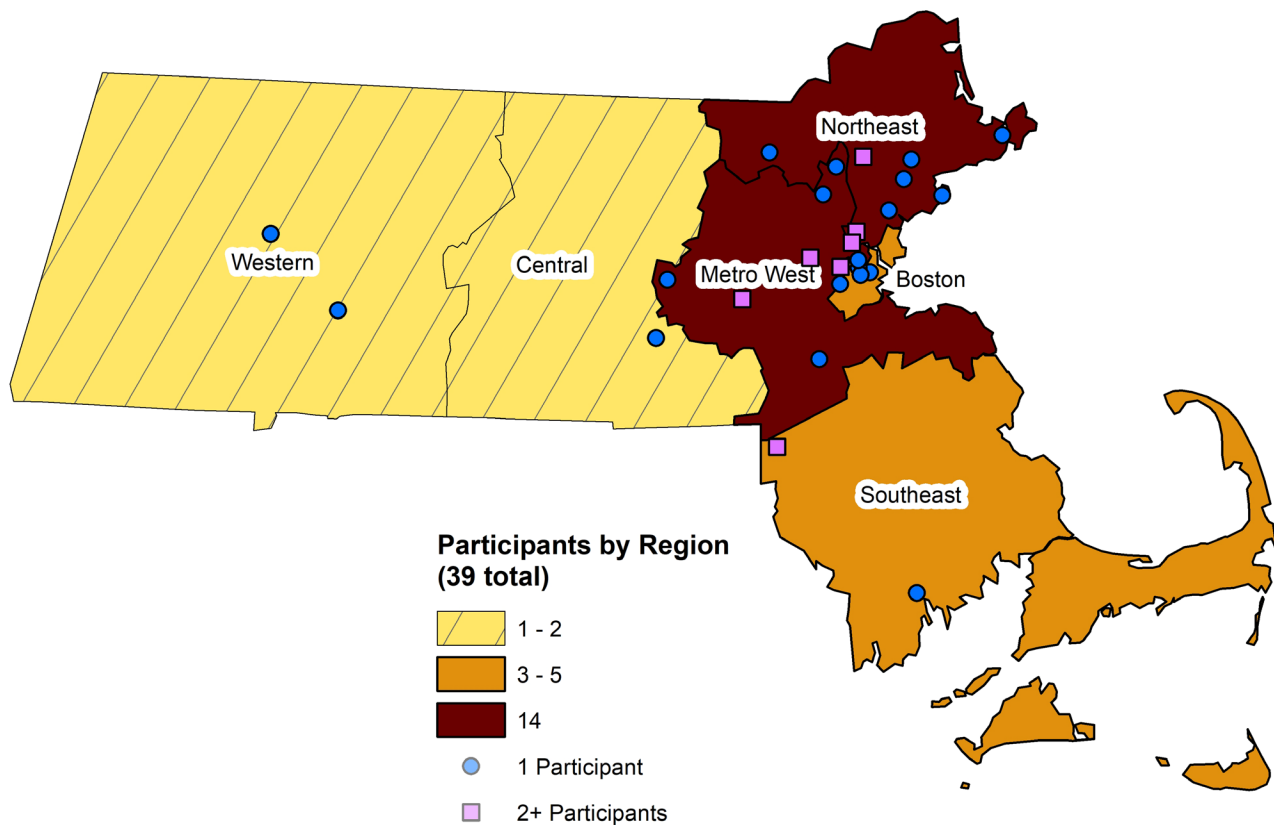


Exhibit 7: Geographic Distribution of Young Adult Participants



Phase III: In-Depth Subgroup Insights and Implications (July 2025 – June 2026)

Phase III (2025-2026) consisted of 6 interviews with young adult support professionals and 5 focus groups with 23 young adults, ages 18-25, residing in Massachusetts who frequently engaged in sports betting, were collegiate athletes, were underage sports bettors (ages 18-20), and/or were not in college.

Interviews with Young Adult Support Professionals

NORC conducted interviews with young adult support professionals (e.g., College Counseling Center Directors, Athletic Directors, mental health clinicians) to understand how they view the impact of sports betting on young adults, particularly on college campuses, and to inform recommendations for mitigating potential harms. These interviews were conducted from November 2025 to January 2026. It is important to note that the first three interviews with Athletic Directors took place in November, the month the NCAA temporarily approved a rule change allowing betting on professional sports for both collegiate athletes and Athletics department staff.³⁵ This decision was rescinded in late November, with

the previous ban on all forms of betting among NCAA Division I schools remaining in place, but the interim period of shifting regulations may have influenced responses from Athletic Director participants.

Interview Guide. NORC drafted a guide based on findings from Phases I and II of the study. The CAB and Gemini Research reviewed and provided feedback on the draft guide. CAB members recommended adding questions about young adult support professionals' engagement with young adults who engage in sports betting, level of concern about sports betting, academic impacts, and social connections. The final guide focused on the following topics (**Appendix G**):

- Context of sports betting
- Impacts of the legalization of sports betting
- Advertising
- Role and experience in addressing sports betting
- Recommendations for mitigating harms

Participant Recruitment. To recruit young adult support professionals, NORC began by compiling a comprehensive list of all colleges and universities in Massachusetts. For each institution, NORC identified and recorded the name and email address of both the Athletic Director and the Counseling Center Director. From this list, NORC selected a geographically diverse sample that represented NCAA divisions and included both public and private institutions. NORC initiated outreach via email, sharing study details and offering scheduling options for participation. A follow-up email was sent to those who had not responded one week later. When initial recruitment efforts did not yield enough participants, NORC expanded our outreach to additional schools. In some cases, individuals who declined to participate noted that they did not have sufficient engagement with young adults who bet on sports or knowledge about sports betting to speak to its impact. In addition, study team members leveraged personal connections at specific institutions to conduct targeted outreach and enhance recruitment. Through these efforts, NORC recruited six young adult support professionals.

Participant Characteristics. The sample consisted of six young adult support professionals, including three Directors of Athletics, two Counseling Center Directors, and one mental health clinician primarily serving youth. Participants were geographically diverse, representing Western, Central, Boston-area, and Southeastern Massachusetts. We did not collect any additional demographic information from participants.

Focus Groups with Young Adults

NORC conducted five 90-minute virtual focus groups with 23 young adults who engage in sports betting. Based on findings from Phases I and II of the study, feedback from the Commissioners on preliminary findings from this study, CAB feedback, and Gemini Research feedback, Phase III focused on engaging the following groups of young adults in Massachusetts:

- young adults aged 21-25 who frequently engage in sports betting

- collegiate athletes
- underage sports bettors (ages 18-20)
- young adults who are not in college

Facilitator Guide. NORC drafted a facilitator guide based on findings from Phases 1 and 2 of the study. NORC and the CAB discussed draft questions for young adult and college student sports bettors. CAB members recommended adding questions about money won or lost, financial literacy, sports betting education, and whether young adults are worried about themselves or others. The NORC Institutional Review Board (IRB) also recommended adapting the guide for underage sports bettors to avoid asking questions that may require self-incrimination in illegal activity. Gemini Research also reviewed and provided feedback on the facilitator guide.

The final guide focused on the following topics (**Appendix H**):

- Reasons for sports betting
- Impacts of the legalization of sports betting
- Advertising
- Sources of support for individuals struggling with the effects of sports betting
- Recommendations for mitigating harms

Participant Recruitment. NORC recruited young adults across Massachusetts for focus groups through various mechanisms. NORC initially developed a list of 70 universities, 29 trade associations, and 57 local organizations that serve young adults. This list was built upon the outreach list for young adult support professional colleges and universities. In addition, NORC and Gemini Research discussed outreach strategies to trade associations, universities in Western Massachusetts, and counseling or student life departments.

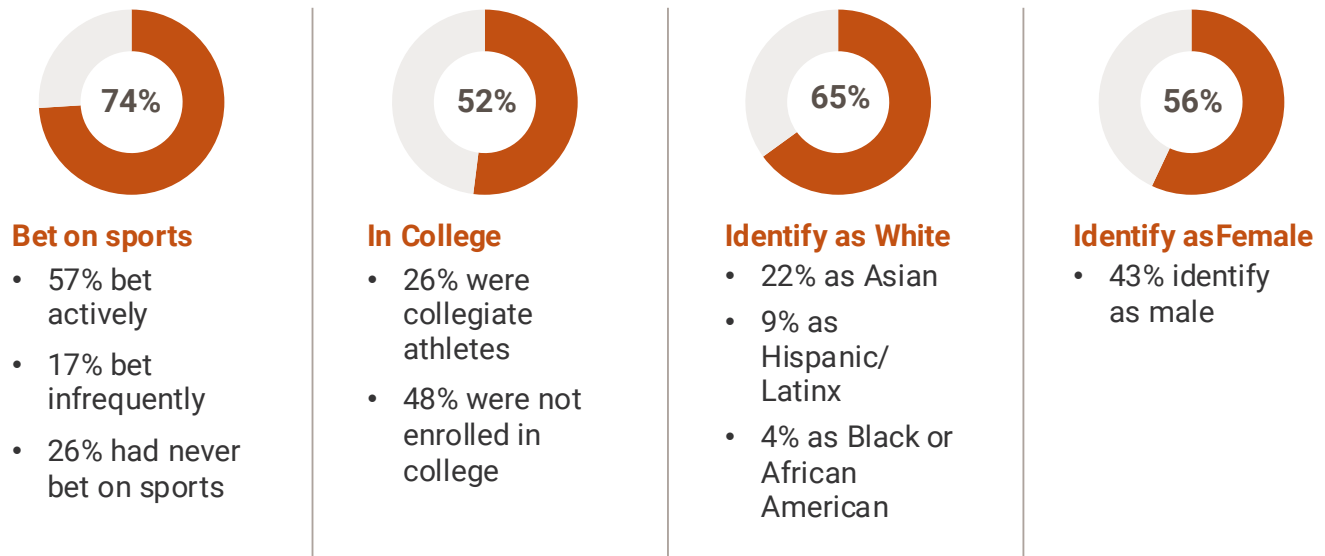
NORC reached out to the universities' student life contacts, previously interviewed young adult support professionals, and contacts available online for trade associations and local organizations. NORC attached a recruitment flyer (**Appendix D**) to all outreach emails and asked organizations to share it with their networks. Eleven participants were recruited via these outreach efforts. NORC engaged the CAB to support outreach efforts and encouraged sharing the opportunity with personal networks. Seven participants were recruited via these outreach efforts.

Due to insufficient recruitment, NORC contracted with the same market research company utilized in Phase II, PRC, to identify additional young adults that met study criteria. NORC specifically worked with PRC to recruit for racial and gender diverse sports bettors, underage sports bettors, and non-college bettors. An additional five participants were recruited through these efforts.

Participants. Twenty-three young adults participated in five focus groups (**Exhibit 8**). About half of the participants were not enrolled in college; among those enrolled, half were actively participating in collegiate athletics. Three-quarters had previous sports betting experience, and about half were active sports bettors. Focus group participants represented six universities in Massachusetts and 11 cities

across the Greater Boston, Central, MetroWest, and Western regions of Massachusetts. Only two focus group participants were in the 18-20 age group; the rest were 21-25. Only English-speaking young adults participated in the study.

Exhibit 8. Characteristics of Focus Group Participants (n=23)



*Active betting included individuals who have previously bet six or more times. Infrequent bettors were individuals who had previously bet no more than 5 times.

Data Collection. Prior to each focus group, we asked participants to engage in a two-part journaling activity about their experiences with sports betting in the week prior to the focus group. NORC, in collaboration with CAB members, developed an online form that we piloted with focus group participants to provide real-time reflections on sports betting. In the first journaling form, participants were asked to document the frequency and amount of sports betting, wins/losses, and real-time perspectives on their sports betting experience in that week. The second form asked them to reflect on their sports betting habits over the past week, including whether they had engaged in sports betting, and how this decision impacted their mood and other areas of life. The questions are available in **Appendix I**. In total, 12 young adults completed the first form, and 18 completed the second.

NORC scheduled times that were convenient for focus group participants and sent reminder notifications before each focus group. Participants received a \$150 electronic gift card via email following completion of the journaling and their participation in the subsequent focus group. Groups ranged from 2 to 6 participants, for a total of 23 participants.

Analysis

Preliminary Analysis. All interviews and focus groups conducted across the three phases were recorded and transcribed. The interviews with policymakers, vendors, and researchers were analyzed in NVivo, a qualitative analysis software for coding and analysis. Interviews with young adult support professionals and focus group transcripts were analyzed in Dedoose, another qualitative analysis software.

NORC developed a codebook in Phase I based on the study's research questions and interview guides. For each subsequent phase, NORC made small revisions to the codebook to align with the study's updated research questions and additional discussion guides, while maintaining consistency in codes across phases. NORC used thematic analysis to analyze the qualitative data, employing a deductive approach in which an initial codebook was informed by the study's research questions, interview guides, and prior research, and was updated as new themes emerged. NORC staff cross-coded a subset of transcripts during each phase and met to review and discuss coding discrepancies and to refine the codebook to capture new and emergent themes.

Participatory Analysis. During the analysis process for each phase, NORC shared preliminary findings with the CAB and community interviewers for participatory sensemaking. This participatory analysis validated key themes and allowed us to co-interpret findings based on the perspectives and lived experiences of CAB members. CAB members and community interviewers shared their perspectives on the findings, validated their interpretation, and articulated their beliefs about the implications. Integrating the CAB into the analytic process enabled the refinement of nuanced findings based on the perspectives and lived experiences of CAB members. NORC also shared this initial synthesis of preliminary findings with Gemini Research and discussed the research themes, priority areas, and reporting suggestions. This process informed the final interpretation and discussion of findings and recommendations presented in this report.

IRB

NORC received initial review and approval from NORC's IRB as 'Exempt' in December 2023. NORC submitted IRB amendments as the study progressed and additional protocols were finalized, and most recently received updated approval in September 2025.

Key Findings

This section presents key findings across all phases of the study. Findings are synthesized from interviews and focus groups (where applicable) with industry and policy interviewees, young adults, and young adult support professionals. Where relevant, additional context and CAB feedback are included in the findings description.

Given the qualitative approach to data collection through semi-structured interviews and focus groups, our goal was not to quantify findings or provide specific percentages, as the methods never intended to capture a representative sample. Instead, through this qualitative approach, we offer an in-depth examination of community-oriented perspectives on sports betting and young adults.

The following descriptive language throughout the findings section approximates the number of participants with the perspectives and themes. Sociodemographic and geographic data for all participants are summarized in the methods section to support the interpretation of findings within this context.

- **Few:** Fewer than 6
- **Several:** 7-12
- **Some:** 14-24
- **Many:** 25-34
- **Most:** 35 or more

Young adult reflections highlighted throughout the findings are derived from responses to the journaling exercise that preceded each focus group.

Patterns of Sports Betting Behavior Among Young Adults

Many young adults bet casually and infrequently, with increased engagement around major sporting events.

Many young adults stated that they bet casually, not regularly. Young adults reported casual betting, though many noted they were more likely to bet on sports during sporting events. These include the Super Bowl, March Madness, and other playoffs and championship games. Many young adults also reported more frequent engagement in sports betting during the National Football League (NFL) and National Basketball Association (NBA) seasons but did not report increasing their bet amounts during these seasons. One young adult shared, *“I’m always gambling on [the championships], but I never gamble too much.”*

A few young adults noted betting more frequently.

Young adults who indicated more frequent engagement with sports betting varied in their level of participation. A few shared that they wager every other day, while others wager at least once per week. A few young adults fell in the middle of that range, noting that they typically place bets two to three times per week depending on ongoing sporting events. A few young adults identified friends or family members that engage with betting more frequently but emphasized their own lower levels of engagement.

The majority of bets reported by young adults

ranged from \$0.50 to \$10, with some young adults

stating that they rarely bet more than \$10. Among young adults who engage more frequently with sports betting, a few shared placing bets greater than \$50. For example, one young adult stated that *“a standard bet might be anywhere from \$20 to \$50 to \$100.”* Some CAB members highlighted how each young adult may have a different definition of what is considered betting *“a little;”* young adults described that, for some of their friends, ‘a little’ is under \$10 while, for others, it could be \$50 to \$100.

Betting Behaviors – Frequency and Amount

Among 13 active sports bettor focus group participants:

- **92%** place bets at least one day per week.
- **46%** spend more than 15 minutes betting per week.
- **54%** spent \$10 or more per week on bets.



Young Adult Reflections

Young adults noted their reasons for not betting on sports on a given day included: lack of interest, money, or major sports events, prior losses, and other priorities. They noted that it made them feel good not to spend money on betting.

“It [made] the games more enjoyable to watch”

–21-to-25-year-old, White, male, sports bettor

“I feel like I was more calm and avoided stressing by not betting”

–23-year-old, Black/African American and White, female, sports bettor

Bet types and the sports young adults bet on varied, but they primarily consisted of Moneyline bets and occurred online via mobile apps.

Football and basketball are popular sports for wagers among young adults, but young adults also bet on a wide variety of sports. In addition to football and basketball, young adults shared betting on baseball, hockey, boxing, mixed martial arts (MMA), Ultimate Fighting Championship (UFC), soccer, tennis, golf, and Formula 1 (F1). The sports young adults reported betting on varied widely by season. For example, young adults noted they are more inclined to bet on basketball during March Madness, and then football and hockey during their respective playoff seasons. Sporting events, such as the Olympics, also diversified the sports on which young adults bet, with two young adults sharing bets they placed on curling. Young adults shared that they prefer to bet on the sports where they are most knowledgeable, with one young adult describing: *“I like betting on things like tennis just because it's a sport that I'm pretty familiar with. But for sports like football or golf, for example, I probably wouldn't touch just because I have a lot more limited knowledge.”*

Active sports bettor young adult focus group participants preferred Moneyline bets because they perceived them as straightforward and less risky. Moneyline bets, wagers where a winner is selected regardless of other outcomes, were viewed as less “serious” bets to place compared to more elaborate bets like parlays, also known as express bets. One young adult noted, *“I'm pretty simple. I usually do Moneyline and then sometimes express [bets]... I don't want to take it that seriously because I'm scared of what it could mean for me.”* Others expressed similar hesitancy on parlays, with one young adult noting that *“the type of bet I usually do is just go for the winner or top 5/top10 of the major PGA [Professional Golfers' Association] events happening throughout the year. I don't have enough confidence to make the parlays or anything big like that.”* Even young adults with more frequent sports betting explained hesitation to place bets on parlays due to their “predatory” nature. One young adult described: *“especially with parlays, it's very predatory in the way [sports betting companies] market it towards people—that it seems like it's just an easy way to make a bunch of money, but you're getting a bad deal.”* While young adults agreed on the risky nature of bet types like parlays, some young adults still reported placing these bets for entertainment purposes, rather than for financial gain. One young adult reflected, *“When I'm betting, I'm not doing it to try to make money. It's more like an entertainment thing.”* This preference for Moneyline bets among the 13 young adult active sports bettor focus group participants remains distinct from national sports betting trends where the popularity of prop bets and parlays are high.^{36–38}

Betting Behaviors - Sportsbook Preference

Percent of 13 active sports bettor focus group participants who have placed the following bet types:

- 100% Moneyline
- 62% parlays
- 62% points spreads
- 54% place round robin
- 46% live
- 46% totals
- 23% prop bets
- 15% futures

Most young adults place bets online or via mobile apps, though some also leverage informal networks.

Most young adults who bet on sports reported primarily doing so through online and mobile platforms, with DraftKings as one of the main platforms. Some young adults use several apps to compare lines and then *“place the bet that has the better line.”* Industry and policy interviewees and young adult support professionals similarly noted that young adults mainly engage in sports betting via online and mobile platforms. Several vendors who participated in interviews noted increases in the number of online and mobile sports betting accounts being created by young adults post-legalization.

Several young adults noted leveraging informal peer networks and bookies. Several young adults described exchanging money (via Venmo, cash) with friends to place *“informal”* or peer-to-peer bets while watching sports together. Some young adults discussed these informal networks and how they have used *“bookies,”* especially before they were of legal betting age. Industry and policy interviewees described peer-to-peer sports betting and *“pooling bets with friends”* as a common form of sports betting among young adults. They noted that *“peer-to-peer”* betting and *“pooling”* bets appeal to young adults’ social needs. CAB members described the process of pooling bets as *“riding a bet together.”* Young adult support professionals also reported awareness that young adults are becoming bookies and expressed concern that this situation can proliferate in residence hall settings on college campuses.

A few young adults mentioned betting on sports in person. Young adults most frequently cited ease of use and accessibility as reasons they participate in sports betting online and via mobile apps rather than in person. Industry and policy interviewees noted that young adults are less likely to engage in in-person sports betting because it limits the frequency and types of bets they can place.

Young adults engage in other related activities such as fantasy sports, social sportsbooks, and prediction markets.

Some young adults reported engaging in fantasy sports through apps like PrizePicks and social sportsbooks like Fliff. Several young adults indicated they participate in fantasy sports annually; others said they have done so only *“once or twice.”* Among young adults who participate in fantasy sports, a few highlighted that they engage but often *“without money involved.”* Young adults also noted engaging with platforms that simulate sports betting, such as Fliff. For example, one young adult explained that Fliff *“gives you a free dollar a day...in five days you would have five dollars,”* which incentivizes participation. A few young adults noted that these faux-simulated sports betting apps can

Betting Behaviors – Bet Type

Percent of 13 active sports bettor focus group participants who have used the following sportsbooks:

- 100% DraftKings
- 38% FanDuel
- 38% Bet365
- 15% BetMGM
- 15% Caesars Sportsbook
- 15% Fanatics Sportsbook
- 8% ESPN BET

help them become exposed to and comfortable with gambling. Members of the CAB similarly described how prevalent fantasy football and poker games are among their friends and colleagues. A few CAB members shared the view that young adults see participating in fantasy sports as separate from traditional forms of sports betting or gambling.

Industry and policy interviewees also noted that young adults regularly engage in other apps that mimic sports betting that have been operational since before the legalization of sports betting. A young adult-serving provider/researcher described, *“there’s a tremendous amount of apps that claim they’re not legally sports betting but mimic the action. And, psychologically, you get that sense of win, loss, reward.”* One Counseling Center Director described how college students will collect bets on “Super Bowl Squares” yet most students do not realize this activity is a form of gambling. The support professional then described, *“recently we had to shut down one of our student organization club’s fundraisers because they were going to do Super Bowl Squares. It’s like well I get it, but that’s sports betting—it’s gambling. You’re paying money in the hope of receiving money in return. But to their credit, or to be fair to the students there, they had no idea.”*

Young adults reported high awareness of prediction markets, but fewer use them regularly to bet on outcomes.

Many young adult focus group participants reported being aware of prediction market apps like Kalshi and Polymarket. However, most noted that they did not actively use them to bet on sports events or other types of events. This increased awareness of these apps was attributed to widespread social media and podcast advertising, with one young adult describing their *“huge marketing success.”* Others commented on recent partnerships between prominent athletes and Kalshi,ⁱⁱ which have increased exposure to these platforms. A few focus group participants described visiting prediction markets *“just for fun”* or because they were *“intrigued”* about how these platforms allow users to bet on the outcomes of elections, award shows, popular culture events, and even the weather. Other young adults were more skeptical about the nature of prediction markets. One young adult conceded, *“I feel like we’re starting to get to the excessive point. I don’t think we really need to be gambling on the weather.”*

— “It starts off as a sports betting game... I’m speaking on the Fliff app that I use. They just recently added a casino called Sidepot. I’d say that’s one way that they’re making ads for that now. I’d say it’s one way that they’re adding to their apps and drawing more people into other paths.”

— 21-year-old Hispanic/Latinx, male, sports bettor

ⁱⁱ As of early 2026, Kalshi has signed partnerships with high-profile athletes, including Giannis Antetokounmpo and Bryson DeChambeau. Other athletes, including several WNBA and NBA players, have also invested in the platform. See [link](#) for more information.

How Young Adults Perceive Sports Betting

Perceptions of Sports Betting Practices

Young adults perceive sports betting positively as a low-risk, casual form of entertainment when used in moderation.

Young adults believe that they wager “*small*” amounts of money that equate with discretionary purchases like “*buying a coffee*” or “*going out to lunch*.” Many positioned betting as a low-stakes, everyday expense rather than as a financial risk. For example, one young adult shared that sports betting has minimal impact on their overall finances, noting that they only bet “*5 or 10 bucks*” which is the same as “*going and buying a coffee a couple times a week*.” Several young adults noted that they only bet money that they would be comfortable losing. CAB members added that this minimization and “*it is not that serious*” mentality is frequent among young adult sports bettors, with one young adult CAB member sharing, “*it’s just another thing to do when I’m bored...it’s just \$5, but it’s a gateway...it’s so accessible and there are so many offers and free money*.” Another added that this mentality is frequent with young adult sports bettors who see betting as activity to do when bored.

“I’m comfortable putting \$10, \$20 into a bet because I know, okay, if I lose that, it’s not a huge amount, and I’m okay with losing that amount.”

—23-year-old, White, female, sports bettor

A few young adults described not incorporating sports betting into budgets or using informal budgeting strategies, such as betting only with “*spare*” funds. A few young adults noted that they do not budget for sports betting. One young adult noted that they only “*place bets on spare money that I have that I’m not really saving for anything*,” while another shared that they just bet with “*money that I’m okay with losing. Once I place a bet, it’s not part of my budget anymore*.” One young adult noted that they place bets opportunistically, when they have money available. One young adult described: “*I haven’t seen someone specifically set aside money to do it. It’s more so, ‘I have money now so I’m gonna do it.’*” Some young adults reported relying on promotional or “*free*” money provided by betting platforms and viewing these as a buffer against personal financial risk. One young adult shared: “*I’m still coasting on the free money that I got when I signed up for the app*,” while another noted that they “*try to stay within the bankroll I have on the apps and try not to deposit more than what I already have on there so it doesn’t affect my personal finances*.”

While young adults shared positive perceptions of sports betting, when asked whether they would advise others to engage in it, many focus group participants expressed hesitation or discouragement. One young adult cautioned a slippery slope: “*Don’t get into it in the first place because you don’t know where it will take you*.” Another highlighted a disconnect between participation and perceived value, noting: “*there are better ways to spend your time... rationally, I know it makes no sense and I’m like, why am I doing this?... Because everyone’s doing it, but I don’t have an actual response that makes sense*.”

Perceptions on Sports Betting Risks

Young adults perceived sports betting as a social activity closely intertwined with drinking alcohol.

Some young adults shared that, when they bet on sports, they are going to bars or other social settings and drinking alcohol. Some young adults associated sports betting with drinking alcohol. One young adult shared, *"I don't think I've ever placed a bet not in a social setting, or...when I'm not drinking,"* while another shared, *"I'll be at a bar with some other people and there will be a game on and I'll be drinking and I'll be like oh why not put a few bucks on this."* One young adult CAB member further explained that *"both [sports betting and drinking alcohol] are social, both feel harmless."*

Several young adults described that drinking increases the likelihood of placing riskier bets.

One young adult highlighted the social push to continue betting in group settings, noting that outings with friends and alcohol often prompt wagers: *"If you're out with friends, you're having drinks, it's definitely like 'oh do five more dollars or do just one more dollar on this.' That definitely is the biggest impact. If I'm just sitting at home, I'm not really betting or doing any of that by myself."*

Several young adults noted that alcohol consumption lowered inhibitions and increased risk-taking, leading to larger or riskier bets.

"If I drink more, then it's probably more likely that I'll place a riskier sport bet."

— Young adult focus group participant

Young adult support professionals echoed these observations, emphasizing that alcohol use can further impair judgment and increase impulsivity. One mental health clinician described, *"at this age, drinking more, and when you're drinking, you're more likely to hit some bet online...when you're not even maybe aware you're doing it because you're under the influence."*

Young adults perceived that sports betting may have negative financial impacts.

Many young adults recognized the financial risks of sports betting. Many young adults acknowledged that sports betting comes with financial risks, but some framed these impacts as exclusively short-term or limited in scope. A few young adults noted a cyclical pattern of losing and winning money, along with uncertainty about *"when to call it quits."* While most young adults believe they generally maintain responsible limits, some acknowledged occasional deviations, such as betting more than intended on a single event or *"chasing losses"* to recoup losses. Nevertheless, many young adults framed sports betting as positive and acceptable *"in moderation"* or with limits, describing their own betting practices as *"responsible."*

Some young adults shared anecdotes of financial loss and a perception of sports betting as risky. Some reported witnessing significant financial losses among peers, including friends losing

substantial sums in short periods (e.g., up to \$2,000 in one day), and noted that, at best, outcomes often result in breaking even. As one young adult reflected, *“I’ve seen a lot of gambling, especially sports betting, caught financially a lot more than it helps in more ways than one, and then when you stop... You can’t even buy yourself a lunch.”* Some young adults linked their skepticism towards sports betting to vicarious experiences, including observing friends or family members experience financial consequences, which reinforced perceptions of gambling as risky despite its normalization.

Some young adults also described how financial losses, regardless of their size, can trigger emotional consequences such as disappointment, frustration, and stress. Although many young adults minimized the impact of losing a bet by emphasizing that they only wager small amounts and are therefore not significantly affected, others noted that repeated losses could accumulate and contribute to stress and anxiety. Several others described feelings of embarrassment or self-criticism, such as *“feeling dumb”* after losing money. Others admitted to short-term depressive reactions after losses. As one young adult explained, *“If I won, I’d be really excited, but if I lost, I’d be really sad.”* Overall, participants perceived these reactions as rare and temporary, minimizing their significance and rarely interpreting them as potential early warning signs of more serious mental health concerns or problematic gambling behavior.



Young Adult Reflections

Young adults believe that sports betting can result in added stress, highlighting related guilt that they did the wrong thing, and that reflecting on their choices affected their worry or stress levels.

One young adult noted they feel **“stress at being constantly pushed to bet when interacting with any sports content.”**

–21-to-25-year-old, White, male, non-sports bettor

Another shared that their **“anxiety is lowered when not sports betting, as I do not feel guilt for myself.”**

–21-to-25-year-old, White, female, sports bettor

A few young adults linked concealed betting behavior and financial loss to strain in personal relationships. Participants described broader relational impacts, noting that betting-related losses can create tension within families and romantic relationships, particularly when betting behaviors are concealed. One young adult recounted that their parents were frustrated after discovering that the young adult had been dishonest in their betting activities, suggesting that secrecy, combined with even relatively modest financial losses, can erode trust and strain interpersonal dynamics.

Young adult support professionals and industry and policy interviewees raised concerns about young adults' financial literacy and money management skills.

Two young adult support professionals described instances in which gambling-related losses directly disrupted students' education. Industry and policy interviewees noted that the structural features of online and mobile sports betting platforms may heighten financial risk for young adults. They pointed to *"sign-on bonuses"* that appeal to younger adults with less disposable income by reducing the *"salience of money,"* putting young adults at risk of debt accumulation. Industry and policy interviewees further noted that these risks may be compounded by developmental factors, highlighting that the prefrontal cortex, which is the part of the brain responsible for impulse control and long-term decision making, does not fully mature until approximately age 25.

CAB members questioned whether the limited financial resources of many young adults, particularly college students, may serve as a protective factor by constraining the total amount of money available for betting, thereby limiting exposure to large absolute losses.

Young adults perceived that sports betting may lead to addiction, particularly in the context of increased access and normalization.**Some young adults believed that access to sports betting can lead to addiction and problem gambling.**

Several young adults described sports betting as *"pretty problematic"* and explicitly linked it to addictive behaviors. One young adult commented on the cyclical nature of sports betting, explaining: *"I spend a lot of money trying to win money back that I've lost... It's like a rotating door."* Others noted that legalization has made it easier both for new users to start betting and for individuals who already bet to do so more frequently or intensely. One young adult described that major sporting events can amplify compulsion through fixation and emotional investment in sports, observing that during periods like March Madness or the Super Bowl, young adults *"fixate on it and focus on it, and they watch it all the time, constantly. They don't really talk about many other things. They get very emotional and very attached to their teams."*

"I've heard through our care team here that someone can't buy their books for classes and then you find out, oh, it's because they lost \$500 on FanDuel...there were at least 2 students...that, actually, had to leave school because of their gambling debt...they owed more than what it cost to go to school here for a year."

— Athletic Director

"For the people that are more problem gamblers where it is actually maybe influencing their life in a significantly negative way, the fact that it's more normalized enables them more because they can just talk to their friends...and then when they talk about it, it's more normalized."

—22-year-old, White, male, young adult, sports bettor

Other young adults emphasized that increased access itself increases risk, with one young adult noting, *“If you have increased access to it, people are probably going to get more addicted.”* A few young adults expressed personal concern about their own vulnerability to addiction. One young adult expressed, *“As much as I’d love to be like, there’s a balance, I don’t really think there is... That’s why I don’t do it often because I’m scared. I know me, if I really get into it, I will be stuck in it.”* Another young adult described sports betting as mentally draining and as *“bad as cigarettes”* in terms of addictiveness.

CAB members echoed these concerns, highlighting the role of instant gratification in sports betting and how rapid feedback and rewards can reinforce more severe or problematic gambling behaviors.

Several young adults linked addiction risk to

normalization and advertising. A few young adults noted that legalization has normalized sports betting to such an extent that it may be harder for individuals experiencing gambling problems to recognize their behavior as harmful and to seek help. Several young adults identified platform features and marketing strategies as contributors to addiction risk. One young adult noted that major sportsbooks *“lure you in with these huge sign-up bonuses,”* creating the perception that betting is *“an easy way to make money, but I think you can quickly spiral.”* Others emphasized that college students and young adults with limited financial resources may be particularly vulnerable to these advertising tactics.

Young adult support professionals reinforced these concerns, pointing to structural characteristics of sports betting that are associated with addiction. This includes frequency of play, speed of betting, variable bet sizes, and the perception that betting outcomes are driven by skill rather than chance. Although they acknowledged the social appeal and growing acceptance of sports betting among young adults, professionals expressed concern that cultural normalization increases risks of addiction, financial harm, and related social consequences. One Counseling Center Director emphasized that constant online access and targeted advertising exacerbate these risks.

A few young adults raised concerns about sports betting as a potential gateway to other forms of gambling. A few young adults noted this as a particular concern for younger generations growing up in environments where sports betting is highly visible and normalized. One young adult noted that early exposure to sports betting can foster misplaced confidence in control: *“It can start that addiction at a younger age, and it can put people in situations where they feel like they have control and then suddenly don’t have control over their behaviors. I do think because it’s sports, which are such an*

“There’s a lot of people that can get addicted to sports betting. Just like anything else. I think that’s always hard because some people have addictive personalities. I know people who personally bet every single day.... Especially if a lot of college students who already don’t have a lot of money are using their resources to sports bet and if they don’t know when to stop, if they’re constantly putting in money and losing it, then that can be harmful.”

– 24-year-old, Asian, female, young adult, sports bettor

Americanized concept and practice, it puts people into this mindset about sports being solely for economic benefit and not necessarily thinking about sports in other ways.”

CAB members shared this belief and referred to young adults as the “*gambling generation*,” highlighting concern about the long-term implications of widespread access and normalization of sports betting among young adults.

While young adults recognized risks associated with sports betting, they often downplayed or exempted themselves and their peers from these risks.

Many young adults recognized financial and addiction risks, yet exempted themselves and their peers from any impact. Many young adults

distinguished their own experiences and those of their immediate social circles from the risky gambling behaviors they described as associated with negative financial impact. These young adults frequently used distancing language, such as “*not personally*,” “*no one in my immediate circle*,” or “*my friends are responsible*,” to describe the absence of financial harm within their own social networks. These young adults also frequently shared that, while they placed bets with low odds of winning, the financial impact was limited due to their “responsible” betting practices, such as small bet sizes and infrequent betting. When sharing about the risk of addiction, several young adults exempted themselves from risk by framing addiction as personality-dependent, with several young adults attributing risk primarily to people with “*more addictive personalities*.”

One young adult CAB member further contextualized this perspective by explaining that it is easy for a young adult to “*casually say, ‘my parlays for the past few months have been messing me up, I need to stop betting,’ but they won’t say ‘I have a problem making unhealthy bets and I need help.’”*

Several young adults described sports betting as “trivial” or questioned whether people who engage in it should be considered gamblers. Overall, young adults tended to separate sports betting from gambling and expressed more favorable views of sports betting as a casual form of entertainment than of gambling. For example, one young adult reflected that sports betting is rarely discussed as gambling, observing: “*Nobody ever really talks about sports betting as being [gambling]... I feel like people don’t consider people in younger generations to be gamblers.*” This young adult went on to reflect that such framing both normalizes the behavior and increases potential harm: “*I truly feel like people think gambling is a joke. It’s like, ‘Oh, yes, I’m addicted to gambling, ha ha, it’s so funny.’ A) it normalizes it a lot, and B) it makes people feel isolated if they actually do have a problem.*”

—**“From my personal experiences and the way that my friends sports bet, I can’t see it being a problem. I know people have gambling addictions... but I think sports betting is different than that. It’s more serious [to go] into a casino and gamble. I feel like when you’re just on your phone placing bets, where you’re watching a game with your friends, I feel like it’s not super serious.”**

—19-year-old, White, female, young adult, sports bettor

Several young adults identified gamification as a key factor that distances sports betting from traditional gambling and diminishes perceived personal risk. The gamification of sports betting has reinforced the framing of sports betting as a low-risk, casual form of entertainment. Several young adults described sports betting apps as designed to make users feel like they are “*playing a game*,” rather than engaging in gambling. One young adult explained: “*There’s more gamification, so it’s not really gambling, it’s like playing a game.*” Another young adult similarly noted that sports betting “*just feels like another game.*” One young adult compared sports betting to social media, noting that the apps are “*optimized for engagement, like social media. So, they’re optimized to make you play as much as possible, to make you wager as much money as possible.*” Other young adults emphasized how promotional framing, such as “*free money*” and game-like play, further reduces perceptions of harm. One CAB member articulated that sports betting “*almost feels like mobile gaming rather than feeling like traditional gambling.*”

Young adult support professionals echoed these concerns, cautioning that the framing of sports betting as entertainment, combined with its gamified design and instant accessibility, can delay recognition of problematic behavior. Support professionals observed that many young adults do not view sports betting as gambling at all, but rather as “*just a fun thing*” to do with friends. This perceived separation between sports betting and gambling may contribute to underestimating risk, postponing help-seeking, and reinforcing beliefs in personal control despite structural features that increase the likelihood of harm.

Perceptions on Sports Betting Benefits

The legalization of sports betting has increased engagement in watching sports because individuals have a personal investment in game outcomes.

Many young adults noted that they are watching, talking about, and attending more sports events because they have an investment in the outcome of the games. Some young adults emphasized the social appeal of sports betting, especially when watching sports in a group setting. Several noted that betting made games more enjoyable overall, “*bringing new energy*” to sports viewing and providing “*another way to be invested*” in games. Many described how sports betting adds excitement and enjoyment to watching sports and increases investment in the outcome of the games. One young adult noted, “*It gets people into sports a lot more because when you have money on the line, you’re going to pay attention to it. No one wants to lose money. You want to win. Even if it’s a big amount or a small amount, who cares? You still want to win.*”

In contrast, a few young adults noted that people are invested in checking apps on their phones as opposed to engaging with each other during sporting events. A few young adults noted that sports betting can make watching sports less fun and more stressful, with a one young adult sharing their decreased enjoyment: *“I love watching football, but I’ll sit there and I’m watching the players that I need to do good. I’m not even sitting there watching the game... You’re watching for these stats to hit. You’re not even watching and enjoying the sport anymore.”* Members of the CAB shared a similar perspective, noting that when you see someone looking down at their phone while watching sports, it is likely that they are checking their bets or placing another.

Young adults identified additional benefits of legalization, including consumer protections and state revenue.

A few young adults noted that sports betting was occurring in Massachusetts prior to its legalization, noting that legalization offered safer platforms for sports betting with greater oversight. Young adults view the legalization of sports betting as a mechanism for enhancing consumer protections. Others emphasized the protections afforded by regulated systems, particularly in contrast to informal or peer-based betting arrangements. One young adult described that some of his peers had been taken advantage of pre-legalization, noting: “having a regulated platform where there’s some oversight of an activity that people would still do, whether it was legal or not, I think is important.” Another noted that legalization provides a “net benefit” as people who want to gamble will do it anyway, regardless of legalization: “At least having some sort of legality there allows people to have greater control over the way that people do sports bet in the future.” A few young adults noted that sports betting is an individual choice, and that legalization allows for the freedom of choice for an individual to bet if they choose to.

“I never had an interest in sports until I started betting on sports. I would watch sports from time to time... but if you have money in it, you’re going to be paying attention to the game, you’re going to be a lot more interested, especially because money is coming out of your pocket that’s actually going to affect you. I tend to pay attention more, my friends tend to pay attention more.”

—24-year-old, Hispanic/Latinx, male, young adult, sports bettor

“I think [sports betting is] a good thing. I think that it already should have been legalized. I think that, especially in Massachusetts, it goes back to the freedom of choice. If we decide that we want to or, me personally if I decide that I want to be able to sports bet, I want to be able to do that. If I decide I don’t want to, I don’t feel like that should necessarily be controlled by the government or anything at a state level.”

— 24-year-old, Hispanic/Latinx, male, young adult, sports bettor

Young adult support professionals and industry and policy interviewees echoed that legalization can provide enhanced protections and increase educational and resource opportunities. Young adult support professionals discussed the broader policy context in Massachusetts, some comparing the legalization of sports betting to that of cannabis. Industry and policy interviewees viewed legalization as pragmatic because of the perception that sports betting would occur regardless, making regulation preferable to prohibition. Further, they acknowledged that legalization offers opportunities for enhanced consumer protectionsⁱⁱⁱ and the expansion of responsible gaming initiatives at both the state and national levels. They highlighted how regulatory frameworks enable funding for problem gambling resources and allow researchers and policymakers to better understand engagement patterns through betting technologies, insights that can inform upstream prevention and harm-reduction strategies.

Industry and policy interviewees also suggested that the shifting social norms may create opportunities to normalize conversations around gambling harms and promote help-seeking among young adults. Overall, professionals believed that legalization has led to greater discussions about sports betting and provides an opportunity to increase access to resources and support.

A few young adults highlighted the public benefits of legalization through tax revenue. A few young adults noted that they hoped proceeds from sports betting could be reinvested in the state for transportation, safety, health, and community programs. Several young adults compared sports betting revenue to that of cannabis in other states, describing legalization as an opportunity to fund broader social improvements. A few young adults, however, expressed skepticism, questioning whether revenue would flow meaningfully back into local communities as public benefits.

ⁱⁱⁱ Consumer protections for sports betting include voluntary self-exclusion, play management tools such as deposit and time limits, and the promotion of the problem gambling helpline. The MGC also enforces strict operational rules to ensure fair and legal conduct by sportsbooks and vendors. See [the link](#) for more information.

How the Normalization of Sports Betting Reshapes Risk

The Role of Social Context and Peer Influence

Sports betting is widely perceived as normalized, driven by its ubiquity and social embeddedness.

Young adults consistently described sports betting as commonplace among peers and as an activity that they frequently encountered in everyday social settings. Across interviews and focus groups, young adults commonly framed sports betting as a routine, socially embedded activity that is a *“fun social thing.”* One young adult spoke to the ubiquity of sports betting and how *“it feels like everyone knows about it, and everyone has done it, or knows someone that [sic] is sports betting.”* Often, they shared that most of their social circles place bets on sports. Regardless of whether they personally engaged in sports betting, young adults described how sports betting is a frequent topic of conversation in social settings, both in person and through group chats, and that it is embedded within everyday conversations and interactions. Many noted that they regularly discuss sports betting, including their wins and losses, with their friend groups and roommates, with one young adult sharing how sports betting is *“what we talk about a lot of the time.”*

Young adults largely described sports betting as increasingly common and socially accepted, especially among their peers, and many linked this shift directly to legalization. Many suggested that legalization signals safety or acceptability, with one young adult explaining, *“That sheer exposure to it, people are now being influenced that it's maybe something that everybody's doing or something that's popular or because it's legal it's good.”*

Young adults consistently describe sports betting as a social activity that fosters shared conversation and camaraderie rather than an activity done in isolation. Overall, young adults perceived sports betting not as a solitary or inherently risky activity, but rather as a normalized and *“fun”* way of engaging with their peers. Several young adults noted that sports betting fosters a fun environment of people *“bonding”* and *“connecting”* while watching sports. Young adults described going to bars and watch parties for major sporting events like the Super Bowl, the World Series, and other playoff games. One young adult noted that *“we socialize by talking about our bets,”* while another noted that sports betting is a way to spend more time with their family. One young adult sports bettor stated that *“people are more connected through [sports betting] in a way. It gives people something to talk about with their friends, or it's a fun way to get to know new people.”* One young adult further highlighted this by describing their betting as an activity exclusive to social settings.

Betting Behaviors – Location

Percent of 13 active sports bettor focus group participants who reported betting in these locations:

- 85% at a social setting
- 85% at home
- 38% at work
- 15% at school



Young Adult Reflections

Young adults reported wagering in social settings (e.g., sports bars), during notable sporting events like the Super Bowl or March Madness, and under social pressure from family or friends.

"When I am surrounded by people who bet, I am more influenced to do so."

–21-to-25-year-old, White, female, non-sports bettor

"I socially sports bet while watching games with friends to make them more interesting."

–21-to-25-year-old, White, male, sports bettor

"I only bet when I am in a social setting, and everyone else around me is doing it."

–21-to-25-year-old, Asian, female, non-sports bettor

Word of mouth and peer influence spread interest and generate participation in sports betting among young adults.

Young adults shared that their engagement is largely motivated by friends who place bets. Many young adults described being initially exposed to sports betting through their social networks after seeing their friends place *"successful bets."* For example, one young adult recalled how they started sports betting after learning that their friends had *"won some insane amounts of money on some bets."* Others spoke to the significance of peer influence on sports betting behaviors. One young adult stated, *"If one of my friends tells me to make a bet, I'll do it,"* while another young adult described, *"I started even considering it because I saw my friends doing it."*

"I'd say 90% of my friends here gamble. My male friends here gamble. It's a lot of people, a lot of college students are definitely into sports betting."

–18-year-old, White, male, young adult, sports bettor

Some young adults shared that family dynamics contribute to normalization and engagement.

Some young adults observed changing attitudes across generations, with parents or older relatives becoming more accepting, and with some parents even participating in sports betting themselves since legalization. One young adult reflected on this normalization among family members: *"I have a younger brother, and when sports betting started happening, my parents were like, be careful, don't waste your time and money, and then now, like a year or two later, my dad's sports betting with my little brother."* Some young adults shared that these familial conversations often occurred around major sporting events or during the holidays, while others discussed sports betting more regularly with their family members. One young adult described how conversations with their father about sports betting happen frequently because *"he probably bets more than I do."*

The Role of Mobile and Online platforms

Mobile and online platforms embed sports betting into everyday life, increasing accessibility and accelerating its normalization.

Young adults pointed to the accessibility and convenience of online and mobile sports betting apps, which young adults widely described as “frictionless” and “immediate,” as contributing to the uptake of sports betting among young adults. Young adults noted that the legalization of sports betting has resulted in more people betting on sports and in people who were already sports betting doing it more, particularly because of the accessibility of online and mobile sports betting apps. They noted that people, particularly young adults, are sports betting more frequently and making it more part of their routine. As one young adult described, *“people that wouldn’t otherwise be doing it are doing it more. People that are already doing it a lot are probably also doing it more with easier access.”* Young adults noted that the legalization of sports betting and broad accessibility via online and mobile apps is what prompted them to bet on sports. For example, one young adult noted, *“I’m not going to leave my state to go place a sports bet. But, because it’s easily accessible on my phone... I felt more comfortable doing it.”* Another young adult referred to sports betting apps as a *“platform for people to participate in gambling when they otherwise wouldn’t be able to.”*

Young adult support professionals and industry and policy interviewees believed that the convenience and ease of access of mobile apps increase the prevalence of sports betting among young adults. Young adult support professionals spoke to a contrast between digital sports betting and earlier forms of betting that required physical presence and greater effort. An Athletic Director noted, *“Now, it’s so easy, the click of a button.”* Many support professionals spoke to the ease of access via QR codes, app downloads, and stored payment methods. One Counseling Center Director shared that sports betting is intertwined with current phone culture, describing sports betting as *“another thing that gets us addicted to our devices.”* Furthermore, several young adult support professionals highlighted how mobile and online platforms distort perceptions of money and loss when young adults are *“pressing a button and the money is gone”* rather than exchanging money in person.

Industry and policy interviewees described how online and mobile platforms offer the convenience, accessibility, and privacy that young adults seek as newly independent individuals, which contributes to their preference for online and mobile sports betting platforms. Industry and policy interviewees also

“I’ve just seen more people doing it. I didn’t know much about sports betting or how it worked before it became legal and was so easy to just do from your phone. I knew there were things like horse race betting... but betting on things like a football game, I didn’t really know that was a big thing until it became legal and people started getting into it.”

—19-year-old, White, young adult, non-sports bettor

expressed concern that the newness of online and mobile sports betting, and its rapidly changing nature, make it difficult to understand, evaluate, and detect problem betting or young bettors.



The accessibility of online apps contributes to mindless engagement for young adults.

Young Adult Reflections

"I tend to check the sports betting apps when I'm bored."

—21-to-25-year-old, White, male, sports bettor

The Role of Advertisements

Pervasive advertising and promotional incentives further contribute to the normalization of sports betting and increased engagement with it.

Most young adults describe being exposed to sports betting advertisements across a broad range of mediums. These include television, social media, mobile apps, podcasts, public transportation, and billboards. Young adults often mentioned social media platforms such as Instagram, TikTok, YouTube, and X (formerly Twitter) as common channels for advertising. This finding mirrors existing research that notes sports betting advertising takes place through various mediums, including national and regional television and radio advertising, online paid placements, influencer marketing, and shareable social media content.³⁹ There have been rapid shifts to novel advertising methods via digital channels and use of influencers that increase exposure to sports betting among young adults.^{22,24,27}

A few young adults highlighted questionable marketing practices, particularly via social media. One young adult described the presence of *"undisclosed ad[s] for the gambling app Stake"* and how these ads are technically against X guidelines, but are nonetheless widespread and serve to increase exposure to sports betting. A few young adults recalled seeing sports betting advertising on their college campus during sporting events. One young adult described how a sports betting company sponsored a large sports event on their campus.^{iv} Some CAB members shared how sports betting advertising is especially prevalent at or around casinos.

Many young adults shared that the ubiquity of sports betting advertisements normalizes it. Many young adults frequently described advertising as being *"everywhere"* and *"hard to escape,"* underscoring the pervasive nature of advertisements that contributes to the normalization of sports betting. One young adult noted, *"I feel like anywhere there could be an ad, usually DraftKings is gonna have a spot there, or FanDuel, [or] some kind of sports betting app."* Young adults who attended college in major cities in Massachusetts frequently mentioned seeing advertisements on nearby

iv This interview was with a Massachusetts resident who attended college in another state.

subway lines, at bus stops, on trash cans, and in college bars, reinforcing the normalization of gambling and its integration into college life, even if this advertising is not found on campus itself. An NCAA survey found that a majority of young adults ages 18 to 22 recalled advertisements encouraging sports betting, highlighting its widespread availability of and ease of access.⁴⁰ Some studies find that advertising is tied to young adult engagement in sports betting and risky betting behavior.^{40–43}

Some young adults discussed how embedded sports betting has become within the sports viewing experience itself, expressing frustration that it can detract from the enjoyment of sports.

Some young adults reflected how sports broadcasters weave sports betting into their coverage of sport events to the extent that it *“feels like that’s all one big ad as well.”* Other young adults similarly lamented that advertisements have negatively impacted the sports viewing experience for fans, with one young adult stating, *“I feel like people care more about the bets that they’re placing than about the teams that they’re a fan of.”* Some young adults described the difficulty of looking up anything about a sports game without being flooded with sports betting advertising. One young adult shared the widespread presence of lines even on non-betting sports apps: *“With ESPN or CBS Sports or those apps where I’m just trying to check scores, they all have lines and stuff on them, and there’s comment sections where people are talking about the lines that they’ve placed. So even the non-sports betting apps have turned into places where people sports bet,”* expressing their frustration about how they *“just wanted to see who was playing,”* rather than encounter multiple ads about which bets to place.

“Social media is a big one, obviously. You can have paid marketing campaigns, you can have organic social campaigns, so [X, formerly] Twitter, Instagram, things like that. Broadcast has also been popular. If you do it during a game or during a sports broadcast, for example at the ESPN broadcast, you might see an advertisement for ESPN BET during the commercial. But I think the main drivers are social digital media and broadcast.”

— Sports Betting Vendor

Promotional strategies with “free money” incentives feel “lower stakes” and more approachable, attracting young adults with limited disposable income to engage in sports betting, though some perceive them as misleading.

Many young adults noted that promotional strategies such as “bonus bets,” “free money,” and “low stake bets” are effective at attracting new users who often have limited disposable income. Many young adults agreed that promotional advertisements and lower-stakes options were effective in enticing them to download sports betting apps and engage in these platforms. Young adults often saw these promotions as low-risk opportunities to increase the little money they had. One young adult explained, *“College students don’t usually have any money, so whatever money they have, it’s like, ‘oh, can I grow it? Can I double it?’”* A young adult support professional echoed how enticing these promotions must feel for young adults and admitted, *“I would have jumped at \$200 as an 18-year-old.”*

Many young adults cited available promotions as a factor in choosing which sports betting app to use, and highlighted advertising as the mechanism through which they learned about the various sportsbooks. Young adults noted that they choose which app to use based on promotions and usability. Young adults found these promotions to be so persuasive that some even encouraged their friends to sign up for accounts to take advantage of the “free play” money. Others emphasized the effectiveness of the timing of these promotions, noting that they are typically available during major sporting events like the Super Bowl. Several young adults noted that they created accounts for the purpose of “trying to get those free bets for the Super Bowl.”

Many young adults pointed to offers such as “Bet \$5, get \$200 in bonus bets” as examples of attractive promotions that may not actually deliver what they appear to promise. Overall, young adults agreed that, despite being effective at engaging new bettors in their platform, promotional advertisements and lower stakes options were seen as misleading. One young adult explained, “It’s not \$200 because it’s bonus bets... it’s almost just like, ‘Hey, we’ll give you this \$200, but you’re probably not going to actually get \$200.’” Young adult support professionals in particular expressed concerns about how these promotions minimize the risks of sports betting by encouraging initial engagement that can lead to severe harms. CAB members also noted that young adults lack understanding that the “free money” is not guaranteed.

“I think one thing that really can draw people in is smaller stake bets, betting on the coin toss or certain things like that that are lower stakes, and you have a 50% chance either way, so it seems like less high stakes. I’d say targeting that might make people more incentivized.”

— 20-year-old, White, female, young adult, sports bettor

Young adults found sports betting advertising appealing.

Young adults noted that advertisements often feature celebrities, comedians, and famous athletes, groups they believed were chosen to resonate with young adults. For example, Kevin Hart was frequently mentioned; multiple young adults cited his popularity among young adults as a reason for his inclusion in these ads. One young adult noted, “I think they’re trying to reach to the youth... between 18 to early to mid-20s, because, for example, the people who watch Druski on YouTube, they’re going to be younger. The people who like Kevin Hart’s comedy, they’re probably going to be younger.” Some young adults commented on the general look and feel of the advertisements. One young adult commented on how they may appeal more to young adults as the ads are “typically colorful and intriguing with the artwork that they have on it.” Some young adults emphasized that they feel advertising specifically targets young adults, many of whom may not even be of age to bet. A young adult reflected, “It is interesting that a lot of the marketing and stuff towards college kids, I feel like, is heavy, when most of them probably can’t legally bet.” Many young adults voiced similar beliefs about the effectiveness of advertising featuring influencers and how their “endorsement” of a sports betting app leads young adults to download it as a result of “influencer culture.”

Industry and policy interviewees noted that vendors cannot target individuals under age 21 in their ads, but young adults expressed concern about the impact of advertisements on them.

Interviewees discussed how sports betting vendors make a conscious effort not to target individuals under 21, including college students, through advertisements. They noted that vendors' advertising decisions are based on the medium or channel preferred by a *"target demographic or audience,"* rather than a specific age group, and that the target demographic or audience is *"sports enthusiasts."*

Nevertheless, young adult support professionals expressed concerns about the perceived intentional targeting of advertising to young adults, noting that the intense exposure during a vulnerable developmental stage puts them at greater risk of problematic sports betting behavior.

Differential Experiences Across Groups of Young Adults

Underage young adults are engaging in sports betting despite age restrictions.

Many young adults described using “loopholes” to place sports bets while underage. Despite regulations and age restrictions, underage sports betting was perceived to be common and easily accessible. Anecdotal evidence suggests that young adults aged 18 to 20, and even younger, are engaging in sports betting. Young adults described sports betting as “*very popular in high school*,” with some commenting how their friends would save money or even “*picked up a babysitting [job] to use that money to bet*.” Some young adults noted that they or their friends have used their parents’ names, fake IDs, offshore accounts, or VPNs to access sports betting apps when underage. One young adult explained that they “*used to sports bet on this site where I would get a VPN to say I was from a different country and use crypto to pay for it*.” One focus group participant also added that there is a “loophole” that allows underage young adults to sport bet on Kalshi and Polymarket. A few young adults shared how they avoid meeting tax thresholds to stay under the radar. For example, one young adult noted, “*People try and never hit \$600 so that they don’t get taxed on it and they don’t have to report, ‘Oh, I’ve been underage gambling.’*”^v Some young adults also mentioned personally using or knowing of others who have used offshore accounts, with one young adult observing how young adults “*might be more likely to use the offshore, less regulated ones if they’re under 18*.”

Industry and policy interviewees noted that sports and sports betting have been deeply embedded in U.S. history and culture, likely leading young adults to be aware of and engage with sports betting even before legalization. They noted that specific regions like the Midwest and Northeast (for example, states surrounding Massachusetts that had legalized sports betting prior to Massachusetts^{vi}) have a long history of sports betting, playing a role in Massachusetts residents’ awareness of and participation in sports betting prior to legalization.

Some young adults knew or assumed the legal age for sports betting was 21 or older, while others were unaware of an age restriction or believed it was 18 or older. Some young adults noted that their friends

Underage Sports Betting

Among 19 young adult interview participants aged 18 to 20:

- **95%** shared having family, friends, or peers who bet on sports
- **68%** reported previously betting on sports

“I’m from Northern Massachusetts. I was a 20-minute drive from New Hampshire. Even before it was legalized, there was [sic] loopholes. You could drive to Salem, New Hampshire, and sit in a parking lot and do a sports bet there.”

– 23-year-old, White, female, young adult, sports bettor

^v This is likely in reference to how winning \$600 or more on a single sports bet may require a Form W-2G from the betting vendor to be submitted with the tax return. See [link](#) for more information.

^{vi} Sports betting was legal in Rhode Island, New Hampshire, and Connecticut prior to being legalized in Massachusetts. See [link](#) for more information.

engaged in sports betting even while underage, disregarding age restrictions. One young adult noted, *"I'm not really aware of it at all. My friends did it even though they were under 18, so I have no idea what the age restriction is. Just off the top of my head, I'm going to assume it's 18."*

One young adult described, *"I think people assume that once you're 18, you're legally allowed to do it. That was my perception of it. It's not really advertised. I haven't seen any advertisement that were like, 'Okay, well, you have to be 21 to be able to sports bet.'" A few young adults noted that they were aware of basic age restrictions, but they did not know the details about the specific minimum age requirements. A few young adults noted that they were aware of age restrictions because they had friends who were under 21 and therefore could not bet on sports.*

"I feel like I wasn't as aware of [the age restriction] until this past year, just because I used to live strictly with people my year for college. Now, some of my roommates are younger and below the age requirement. So, I feel like I wasn't really aware until there was [sic] people around me who couldn't do it."

– 22-year-old, White, male, young adult, sports bettor

Young adult support professionals cautioned that early exposure to sports betting contributes to underage engagement. A Counseling Center Director shared that their school admits students who are as young as 15 years old in their early college program. These young students take classes with older students, so *"the potential for exposure [to sports betting] is significantly increased even more than it might be at a traditional high school because there are many more legal age adults that are available."* This interviewee went on to describe this underage access as *"extremely problematic"* but difficult to limit because students *"can always get their friend's account and pay them."*

Young adults believe that young adult sports bettors are primarily men; however, they shared perceptions that young women's engagement is increasing.

Many young adults shared that their male friends were more likely to bet on sports than their female friends. One young adult provided the framing for this perception, sharing that young men are *"more into sports,"* while another young adult shared that sports betting is *"more male-dominated probably because males that are younger are more risk-prone."* Young adult support professionals added that sports betting is much more frequent among young men than other types of gambling.

Many young adults described that sports betting advertisements target young men. Many young adults believed that advertisements appear tailored to young men. Examples of this tailoring included the inclusion of sports figures and influencers with predominantly male audiences. Some young adults commented on the flashy and visually appealing nature of the advertisements, observing that they often include attractive models or other elements designed to interest young men. As one young adult noted, *“They’re attractive models on there... it’s [targeted at] young men, I would say, for sure.”* One young adult linked this perception of targeted advertising to broader associations between sports and men and how sports betting *“just comes with that territory”* of sports these days.

“I think they typically target males because a lot of the times, the ads will have someone impressionable in sports... Sometimes they just seem targeted towards male athletes or men that watch these people on TV. Not saying that females don’t, but they seem generally targeted to more of the male demographic.”

– 24-year-old, Asian, female, young adult, non-sports bettor

A few young adults noted that since legalization, more young women have begun betting on sports. One young adult noted, *“More of my girlfriends now like sports because of it. I think it’s directly correlated to DraftKings or just the legalization of sports betting because they have something on the line. They have something to watch for. Because of that, they are now interested in it.”*

Female bettors were influenced to start betting by advertisements, as well as by friends, family members, and significant others. Many female young adults shared that they started sports betting because of promotions or referral bonuses. In one focus group, young adults discussed how vendors appear to be targeting young women more intentionally, particularly in a recent Fanatics ad featuring Kendall Jenner.⁴⁴ One young adult shared: *“It was a great advertisement, honestly, and I could see a lot of people just sort of tuning into that. Younger people, too, and females.”* In addition, several female bettors shared that they started betting because of their boyfriend’s influence: *“I was first exposed to [sports betting] when I was in college, especially since my boyfriend was in Greek life and was very big in sports, and all his friends were very big sports fans. So I was just around it a lot.”* In addition to significant others, several female sports bettors shared that male family members exposed them to betting. One young adult shared, *“I first became interested because my brothers were betting quite often, and that’s how I heard of it.”*

Young adult support professionals expressed concern that stigma around gambling for women may lead to increased risk. One young adult support professional cautioned that sports betting *“could quickly become a bigger issue for women”* as women’s sports get more popular. Other young adult support professionals observed that young women may engage more discreetly in betting, which could increase risks, with one noting the problem can stem from it *“not being spoken about.”*

Young adults shared high levels of exposure to and engagement with sports betting on college campuses.

Many young adults noted that sports betting is prevalent on college campuses, particularly within “sports schools.” Many young adults shared that college was a point of entry into sports betting and articulated that sports betting is highly visible, socially accepted, and encouraged by peer networks at college. One young adult highlighted the ubiquity of sports betting in college life and how *“you’re bound like statistically to have at least one friend that gambles.”* A few young adults noted that exposure and engagement may be higher at “sports schools,” with one young adult sharing, *“at least where I go to college, the sports culture is huge... I know a lot of people in their dorms who would just do like this internal betting or place bets on certain games. I do think it is pretty popular within the college community and the college students.”* Young adults recalled being first exposed to sports betting early in their college years, with some engaging informally through bookies in their residence halls before they were of legal age.

Young adult support professionals frequently noted the prevalence of sports betting in college settings, emphasizing that students routinely engage with betting platforms. Young adult support professionals discussed the prevalence of college student sports betting and echoed how widespread and socially embedded it is on campus. An Athletic Director reflected that the college environment exposes students to more sports games, which can be viewed as positive but can also predispose students to sports betting. Several emphasized how the communal living arrangements and strong sports culture at college also contribute to increased exposure and engagement in sports betting. Furthermore, the increased autonomy and constant social interactions were viewed as powerful contributors to sports betting behaviors among college students.

One Director of Athletics shared their observation that, *“People used to gather around a keg and watch a game, and now they gather around a keg and bet on a game.”* Several described how betting seems to fit seamlessly into students’ daily routines and is embedded in activities like scrolling on phones and discussing sports with friends. One young adult support professional mentioned that they have witnessed a “bro culture” where male college students bet together in the campus’s Student Center. This “groupthink,” as the young adult support professional noted, can snowball into young men betting more frequently and with larger stakes. Many support professionals emphasized the cultural shift that they have observed related to how sports betting has become widely accepted and is increasingly accepted as a cultural norm: *“it’s everywhere, and it is part of the culture as much as Coke, Pepsi, and seltzer water.”*

Young adults viewed NCAA prohibitions as a strong deterrent to sports betting among collegiate athletes, but raised additional concerns about athletes’ well-being due to pressure from bettors.

Most collegiate athlete focus group participants emphasized the illegality of sports betting among collegiate athletes and believed that most of their peers also refrain from betting. Due to NCAA regulations, collegiate athletes cannot bet on other college or professional sports.³⁵ If a

collegiate athlete bets on sports and is caught, their eligibility could be taken away, which many collegiate athletes underscored as a severe consequence. Despite this, some collegiate athletes acknowledged that some of their peers or collegiate athletes in other schools either bet illegally or when they leave athletics. Collegiate athletes shared that they receive mandatory sports betting education annually provided by athletic departments. These educational events discourage sports betting and reinforce eligibility rules among collegiate athletes. One young adult noted that, during one of the educational events, a former female collegiate athlete spoke about how betting negatively impacted her and her scholarship. The young adult shared that, because the speaker was a woman, *“it was sort of like a big ‘oh this happens to or could happen to anyone’ moment.”*

Some young adults shared concerns over increased pressure for collegiate athletes due to sports betting. When asked about potential impacts of sports betting on collegiate athletes, one young adult shared that *“they can have a lot more pressure because a lot of people are betting money on them.”* Another young adult shared that *“the fans get mad and then they blame them and then that ends up taking a toll on...the athletes’ mental health and then it ruins their experience and relationship with the sport.”* Young adults noted that harassment aimed at collegiate athletes may contribute to stress, anxiety, and diminished enjoyment of sport. These dynamics were viewed as exacerbated by the growing commercialization of collegiate athletics, including name, image, and likeness (NIL) deals and the increasing presence of money in collegiate sports. Several collegiate athletes brought up game manipulation, with one sharing, *“especially at the bigger schools, there’s athlete dining halls, common athlete spaces where you can see ‘oh, this player’s hurt, I’m going to bet that they won’t play.’”* While none of the collegiate athletes that participated in focus groups shared personal anecdotes, one young adult support professional shared: *“I could tell you the things that have been written about our basketball coach that would turn your stomach because we only won by 5 and we were supposed to win by 7.”*

“The social media component on this is huge for student athletes, I would imagine professional athletes as well, where social media bullying and harassment has just gone through the roof. I mean, you read some of these texts, or posts, or whatever, and they’re like, how is someone not knocking on their door saying, ‘you’ve made a death threat? You know, you can’t do that.’ That people would make a death threat about an outcome of a game, or number of free throws in a game is beyond me.”

— Athletic Director

Opportunities to Mitigate Risks and Potential Harms of Sports Betting

Awareness and Access to Resources

Young adults are largely unaware of resources or mitigation steps for problem gambling beyond assuming the existence of helplines.

Many young adults noted that they were not aware of any available resources for problem gambling, highlighting that they did not know where to go or whom to call if they needed help. Some young adults noted that they assume that there are groups and resources to support problem gambling, similar to those that exist to support people struggling with substance use. Some young adults noted that there are likely resources for gambling in general, but they are not aware of any specific resources for sports betting. One young adult described, *“As a generation, honestly, we’re not aware of resources that can be of use for us. Specifically, I don’t know anything that would help with gambling addiction. I know there are phone numbers that you can call, but where to find those and what phone numbers, I have no idea.”* One young adult noted that they assume resources exist, but those resources are not as *“visible as they should [be],”* noting *“if someone’s looking for them, I hope that they’ll find them, but I don’t see as many advertisements or information about how to mitigate risks.”* Some young adults framed this lack of awareness due to lack of need, noting that they would only look up available resources if they *“thought I had an issue.”*

Some young adults shared awareness of disclaimers and helplines, but questioned how helpful these resources might be. When asked about available resources, some young adults described disclaimers and helplines they had seen in sports betting apps and sports advertisements. These young adults described these disclaimers as being designed to protect vendors from liability rather than to genuinely inform users of gambling risks. One young adult commented that the disclaimers read as *“participate at your own risk”* and convey the message that vendors do not want to be responsible for any potential risks. These young adults also noted that these disclaimers are typically small, easy to overlook, and reminiscent of consent notices on social media and other technology platforms.

“Basically, every [sports betting] page has a tiny little text at the bottom. Like, ‘Think you have a problem? Click here’... it was presented in a way that this is something to get through before you can do the fun part.”

– 21-year-old, Hispanic/Latinx, male, young adult sports bettor

While aware of helplines, young adults questioned how helpful they are for young adults. One young adult sports bettor described how they view helplines as a “cop-out” and explained, *“[My friends and I] have a joke about the gambling [helpline] that they put in the corner of every ad... Nobody actually ever sees it.”* Another young adult expressed, *“no one takes [helplines] seriously, because no one thinks that gambling is an actual addiction.”*

Directors of Athletics and College Counseling Centers lack training and resources for how to support young adults with problem gambling.

Young adult support professionals noted that there is a current vacuum for training and education specific to young adult sports betting. One Athletic Director noted, *“there's definitely been no training within the college, conversation within the college, specifically in regard to sports betting, and, that might be something that will be coming down the line or needs to be developed relatively soon.”*

They further expressed concern that, by the time problem gambling becomes a crisis that they are aware of, young adults have already lost a lot of money and experienced significant negative impacts, highlighting the need for earlier, more preventive measures. Another Athletic Director noted that their current approach is to direct students to their counseling center, which provides general education around gambling as well as offers one-on-one meetings for students. One Counseling Center Director noted that they would like more information on available programs to which they could refer young adults, for example, intensive outpatient programs specifically for gambling.

One mental health clinician noted that they would like more resources and training on young adult sports betting. The same clinician noted that current protocol is to identify if gambling is a problem area via an intake form and then refer young adults to additional care if the gambling problem is beyond the scope of their practice. They described themselves as a *“resource broker”* that can provide support and referrals to other resources and that they have been actively putting together events and lunches to talk to students about mental health, partnering with local organizations with expertise in addiction, and sharing posters and flyers with resources and information, including on problem gambling.

“I'm constantly trying to attend trainings and make sure that, as things are changing, that I'm making sure I'm following best practices... I want to make sure I'm providing the most appropriate support, but haven't been able to find a ton of resources beyond, the MA Problem Gambling Helpline... I think we started flying the plane before we fully knew what was needed to fly it safely... I think more needs to be done in terms of having additional resources for providers, such that the support can be adequate.”

—College Counseling Center Director

The Role of Multiple Systems and Actors

Young adults and young adult support professionals framed responsibility for mitigating gambling-related harms as shared across multiple actors, including government and regulators, sports betting vendors, colleges and universities, sports organizations, and individuals themselves.

Government Bodies

Young adult support professionals and several young adults identified policymakers, MGC, and other regulatory bodies as central actors in harm mitigation, particularly given the state's role in legalizing and overseeing sports betting. As one Athletic Director noted, if the state *"voted to allow it, then they need to be the ones that are prepared to regulate it."* Other young adult support professionals emphasized government responsibility for setting guardrails that shape the sports betting environment, especially related to advertising practices and betting safeguards. A few described a need for additional age-based protections, with one Athletic Director proposing a minimum betting age of 25. Beyond regulation, young adult support professionals emphasized the government's role in capacity building, including developing guidance, training materials, and public-facing campaigns for colleges, mental health providers, and young adult-serving professionals.

Several young adults compared sports betting to alcohol and tobacco, noting that government has historically intervened to restrict advertising and communicate health risks. Young adults described sports betting advertisements as pervasive and insufficiently transparent about potential harm, suggesting the need for stricter advertising limits and clearer warning messages. They frequently shared that policies could reduce exposure to sports betting advertising among young adults, especially for those under the minimum legal age for sports betting. One young adult described that sports betting advertisement, *"should be regulated like cigarettes. [They] used to be advertised everywhere, and they put regulations on them."* Several young adults also expressed concerns related to *"predatory"* sports betting practices like sign-on bonuses and free bets.

Several young adults raised concern over particularly high-risk bets like prop bets and parlays, which may require additional oversight. This suggestion echoes calls by the NCAA, NFL, and other organizations to eliminate or restrict gambling on individual prop bets and other high-risk prop bets. In Massachusetts, state Senators have been advancing the Bettor Health Act (S 302), which includes a proposal to ban in-play and prop bets.^{45–47}

A few young adults expressed ambivalence towards government regulation. A few young adults framed sports betting as a matter of personal freedom and individual choice. These young adults acknowledged the risks of excessive betting but cautioned against overly restrictive policies that they perceived as limiting autonomy or eliminating a form of entertainment. One young adult shared that, despite acknowledging sports betting can lead to financial ruin and addiction, *"there needs to be some*

"Seeing my sister living in Nevada, there's so many posters or street signs of, 'If you need help, call this number,' because Vegas is the city of gambling. I feel in Massachusetts, I've seen ads to sports gamble but I haven't seen, 'if you need help if you're having a hard time...' I don't think that's as popularized... I think it should be, just because it's a slippery slope of it all."

– 21-year-old, Hispanic/Latinx, female, non-sports bettor

line in terms of what's allowed in terms of sports betting, but I think to completely eliminate it is also problematic in that it's taking away some people's hobbies."

Sportsbook Operators

Many young adults identified sportsbook vendors as bearing substantial responsibility for mitigating harm, given their roles in designing, marketing, and profiting from sports betting.

Many young adults noted that aggressive sports betting promotions should be matched by meaningful safeguards to reduce harm. As one young adult described, *"they're the ones that are so heavily promoting it... it should also be up to them to give the restrictions, and set the standard on that, because I feel like with state and federal, the lines get blurred, and people don't agree, and it's hard."*

Young adults suggested that vendor-led interventions include betting limits, loss-based financial cutoffs, time limits within apps, and clearer disclosures about spending (e.g., through dashboards and weekly or monthly spending summaries). Young adults compared these measures to alcohol service practices, where bartenders can cut off someone after too much drinking.

Young adult support professionals highlighted the potential value of account dashboards and regular spending summaries to help users better understand their cumulative losses over time. For example, one Athletic Director noted, *"I think it would be very helpful if people were presented their history on a more regular basis... I think [it] would help people understand the impact that it's having on them because, in some cases, I think you don't really realize how much you're losing until it becomes a major issue, but it's probably been an issue for a while."*

Young adults also recommended mandatory in-app warnings, helplines, and disclaimers, especially after prolonged use or significant losses, similar to warning labels on cigarette packages. Additional suggestions included self-exclusion options, limits on credit card use, income verification, and stronger identity verification mechanisms. However, some young adults questioned whether these features would meaningfully influence behavior, noting that existing tools can be easily ignored or bypassed. One young adult noted, *"I know, personally, every time I log on, it tries to get me to set limits. I don't know if that's a good thing or a bad thing, but I never do."*

Industry and policy interviewees noted that responsible gambling initiatives are already provided by sports betting operators and include identity verification tools, app alerts, gaming management tools for

"I think largely it should be the vendors. They're essentially creating the issue. When we think about cigarettes and all those things that also contributed to mass health detriments... they were... held responsible for some of that. I feel that would be a reasonable ask of the vendors to promote these resources, to promote these campaigns about the dangers of [sports betting]."

—College Counseling Center Director

sports bettors, partnerships with treatment organizations, an exclude-one-exclude-all policy, and sharing PlayWell (previously GameSense) information.

At the same time, both young adults and professionals expressed skepticism about the effectiveness of operator self-regulation. They pointed to conflicts of interest and framed existing responsible gambling messaging as largely performative. As one Athletic Director described, such efforts can resemble *"public relations standpoints and statements, as opposed to real fixes."*

Colleges and Universities

Young adult support professionals and young adults viewed colleges and universities as playing an important role in harm mitigation, including through education, awareness, and referral to resources. Young adult support professionals highlighted the unique access that colleges and universities have to young adults, positioning them as key points for early awareness, education, and normalization of conversations about gambling risks. Athletic Directors described having a primary role in educating their students and serving as a resource. Their many interactions with students, both in formal and informal roles, afford them the opportunity to engage young adults in conversation about a broad range of topics, including gambling. As one support professional described, *"it's no different than we have to talk to them about [alcohol]... And we talk to them about looking out for each other. That's our role."*

However, several young adult support professionals acknowledged that students may be reluctant to discuss sports betting with staff due to power dynamics, concerns about mandatory reporting, or fear of NCAA-related consequences. One support professional described, *"The onus also falls on folks like myself, practitioners, who are working directly with the public, with the community. How can we show up for, but also educate on all these varieties of potentially harmful [things]... And I think there's a delicate but important balance between education and destigmatization, but also, 'hey, I'm putting this out there for you to engage with in case you need it.'"*

"Because I'm in an administrative position, the students don't feel comfortable talking with me about [sports betting]... But I have talked with them about it a couple of times, so it doesn't seem like they don't want to engage on the topic at all. But it seems like they're more willing to talk about sports in general, but less willing to talk about sports gambling."

— Athletic Director

Young adult support professionals and young adults also described a need for more formal educational efforts, including mandatory training (especially for athletes), workshops, seminars, and integration of sports betting topics into curricula. These were compared with alcohol education modules already required in colleges. Several young adults emphasized the value of peer-led approaches, suggesting that hearing from other young adults or athletes who have experienced gambling-related harms would resonate with their peers.

Sports Organizations

Industry and policy interviewees and young adult support professionals described differing views on the enforcement of NCAA rules for collegiate athletes. Industry and policy interviewees suggested having stricter enforcement of NCAA policies prohibiting collegiate athletes from engaging in sports betting, particularly in Division II and III programs. In contrast, young adult support professionals described the need for harm reduction approaches^{vii} to sports betting among collegiate athletes rather than a solely punitive or zero-tolerance framework. Young adult support professionals described that current NCAA policies create strong disincentives for disclosure, as student-athletes who acknowledge gambling-related harms are at risk of severe and sometimes permanent consequences. As a result, collegiate athletes may hide their betting behaviors until harm escalates, limiting opportunities for early intervention.

Athletic Directors referenced the proposed NCAA policy change that would allow collegiate athletes to bet on professional sports, though this rule change was rescinded after 30 days, reinstating the ban on all forms of sports betting.³⁵ One young adult support professional expressed concern about removing guardrails on sports betting and instead advocated amnesty or graduated consequences. For example, a first offense or self-disclosure would result in education, treatment referral, and harm-reduction support rather than permanent sanctions. They suggested that this approach would better align with how colleges handle other risky behaviors, such as alcohol use. Young adult support professionals also noted that an outright prohibition on sports betting is unlikely to be effective, given the accessibility of betting apps and the ease with which athletes can conceal their activity.

Some young adults suggested that sports organizations and their governing bodies could help mitigate harassment, particularly in college sports. Some young adults noted the need for clearer boundaries between sports competitions and gambling promotions, especially during sports broadcasts. They noted that this may also reduce the tendency to view student athletes primarily as sports betting outcomes, forgetting that they are also students and competitors. One young adult recommended that sports organizations themselves support mitigation strategies, particularly around reducing advertising during sporting events. Another young adult shared, *“Having a way for the leagues themselves... or segments on broadcasts... I feel like it should be clearly designated as, like, it's an ad, it's a company, it's not part of the sport itself, because... The more that those things get merged together, the less, you know, of a sport we have, the more of a... just a thing to bet on.”*

Individuals

A few young adults and young adult support professionals emphasized individual responsibility, framing sports betting as a personal choice that requires self-regulation. A few young adults noted that individuals must ultimately set limits, budget appropriately, and recognize when betting ceases to be recreational. One mental health clinician noted, *“It's hard because... at the end of*

^{vii} According to the NCAA, “harm-reduction strategies foster prevention, risk reduction and health promotion. Harm-reduction strategies acknowledge actual behaviors (e.g., some student-athletes do bet on sports) and attempt to meet individuals where they are.” See: https://ncaaorg.s3.amazonaws.com/ssi/mental/SSI_HarmReductionforGamblingandSportsBetting.pdf.

the day, every individual is responsible for their own choices.” One young adult added, “This budgeting thing is really important. And also, seeing betting as a game... it's not something that's gonna affect my life, that it shouldn't affect my life... If I'm doing this, I need to make sure I can keep control in a way.” A few young adult support professionals emphasized that while the individual may be responsible, parents could also have a role in conversations with their children about financial responsibility and responsible gambling.

Participant Recommendations for Programs and Policies

Currently, no federal regulations or oversight organizations exist for gambling or sports betting, so policy defaults to the state level. Industry and policy interviewees noted that current regulations and protections are available at the individual, community, and policy levels, though there are opportunities for additional responsible gaming initiatives. They described that additional responsible gaming initiatives for young adults should include prevention, education, treatment, enforcement, research, and recovery. Young adults and young adult support professionals proposed multi-level strategies to reduce harm while preserving perceived benefits, including raising education and awareness, policy reform, advertising regulation, support services, app-based safeguards, and research (**Exhibit 9**).

Exhibit 9. Recommendations for Mitigating Sports Betting Harms

Area	Recommendations	Quotes
Education & Awareness Raising	• Develop financial literacy programs that include content on gambling • Create mini-courses and training for colleges about gambling, similar to required courses on substance use • Promote FAQs and resources on apps and websites and across campus • Develop and share resources with athletic directors, mental health clinicians, and other staff and professionals that serve young adults • Develop resources that highlight that sports betting is a form of gambling and that are geared towards engaging young adults	“I really think maybe just a mini class on gambling or a breakdown of what actually is, you are putting your money into a pot and side effects of it like we do on drinking and stuff, drinking and drugs, but it needs to be on gambling.” –23-year-old Black/African American and White, female, sports bettor

Area	Recommendations	Quotes
Policy & Regulation	- Ban or restrict sports betting done online or through mobile applications, limiting betting to in-person venues - Raise minimum age for sports betting (e.g., to 25) - Enforce NCAA rules more strictly for student athletes - Create amnesty policies and harm reduction approaches (e.g., referral to treatment, etc.) for collegiate athletes who engage in sports betting	“...the apps [are] what makes it dangerous because it's so accessible. It's like having drugs next to you all the time. Obviously, you're going to do the drugs if they're so accessible, it's so much easier to get addicted. Same with the apps, they're on your phone.” –23-year-old Asian, female, sports bettor
Advertising & Messaging	- Establish stronger regulations around advertising and promotions - Launch public service announcements (PSAs) on sports betting harms, similar to anti-smoking campaigns - Include risks and available resources clearly in betting ads - Restrict ads during sports events - Ban gambling content on streaming platforms like YouTube	“I could see the state advertising, kind of like how they have tobacco commercials that say, ‘Okay, don't smoke tobacco because it's bad and it has this effect.’ I can see them having an advertisement on TV [about sports betting]. I could also see the government or state level forcing these companies to put some negative effects of gambling at the end of their commercials.” –24-year-old Hispanic/Latinx, male young adult who has previously bet on sports
Support Services	- Expand access to counseling and support groups - Increase awareness for young adult support professionals about available treatments and programs for gambling and sports betting - Promote available support services in ads and on platforms - Include links to helpful resources directly in betting apps	“I really think the organization should have more resources... That might honestly help with people who only focus on the negative effects with sports gambling, or sports betting, just saying, ‘Hey, these are the negatives, but here's what we have to help combat those negative effects.’” –23-year-old White, female, sports bettor

Area	Recommendations	Quotes
App-Based Safeguards	• Add warnings and disclaimers before bets • Implement loss and bet limits (e.g., daily caps) and time limits • Trigger notifications when users reach designated loss thresholds (i.e., a \$500 per day loss limit) • Provide unprompted access to self-help resources within apps • Provide historical accounting or dashboards of weekly or monthly spend	“The apps... should have some notification of when you are down on a lot of money... There should be a set notification where you haven't won anything, and it should be like, ‘Are you sure you want to continue with this?’ or ‘We might have to cancel this.’ I see a lot of sports betting apps that will limit you if you've won a lot, which it's part of their model, but there has to be something on the other end where it's limiting you because of how much you're losing. I feel like that's fair.” –<i>21-year-old Hispanic/Latinx, male, sports bettor</i>
Research & Evaluation	• Fund independent studies on sports betting impacts • Evaluate the cost-benefit of legalization • Use findings to inform programs, policy, and public education	“It is reassuring that there's an independent look into the cost-benefit of legalization and implementation of sports betting outside of just the companies wanting to make money from it. An actual look at the benefit to people.” –<i>25-year-old White, male young adult who has previously bet on sports</i>

Discussion

Since the legalization of sports betting in Massachusetts in 2022, young adults aged 18–25 have increasingly engaged with this newer form of gambling. This study, grounded in community voices and lived experiences, reveals a complex picture of how young adults perceive and engage with sports betting in Massachusetts.

Normalization of sports betting, driven by advertising, accessibility, and social networks post-legalization, shapes risk perception and engagement.

Sports betting is becoming a normalized part of young adult culture, as legalization has led to widespread use, advertising presence, and convenient access through online and mobile apps.

With sports betting predominantly online and high daily screen time among young adults, the low barriers to entry for mobile sports betting contribute to high levels of engagement among this age group.⁴⁸ The shift post-legalization to app-based “frictionless” betting has increased the convenience and immediacy of sports betting, factors that contribute to young adults’ perceptions of it as a normal, low-effort extension of time spent on their phones rather than a distinct gambling activity. Widespread advertising continues to reinforce the normalization of sports betting. Young adults shared heavy exposure to sports betting ads, especially on social media and during sports broadcasts, including advertisements perceived as appealing to young adults. Young adults identified promotional incentives, such as free bets and low-stakes framing, as effective at attracting new users, even when they recognized these offers as potentially misleading. Young adults also commonly framed sports betting as a cultural norm. Young adults attributed this normalization, at least in part, to sports betting being viewed as a social activity and form of entertainment, likely contributing to the perception that it is “trivial” and not considered “*gambling*.”

However, some young adults expressed concern about the effects of normalization on overall health and well-being, given the potential negative consequences of sports betting. These findings align with prior research that suggests that increased accessibility and exposure to gambling opportunities can heighten risk for problematic behaviors.^{17,49} This highlights the need for additional evidence-based programs, policies, and interventions that educate young adults and raise awareness about sports betting, gambling, and risks for gambling-related harms.

Perceptions of low risk and high control shape young adults’ engagement with sports betting.

Many young adults recognize that sports betting can pose risks, including financial loss and problem gambling, particularly when done without limitations and control. However, these concerns stand in contrast to young adults’ framing of their own betting behavior as low risk. Young adults frequently downplayed their own or their peers’ vulnerability to these risks, commonly using phrases like ‘*not personally*’ or ‘*no one in my immediate circle*’ when articulating sports betting risks. Young adults often

framed sports betting as involving “*small*,” inconsequential amounts comparable to routine discretionary purchases (e.g., buying a coffee), thereby framing the financial impacts of gambling as a personal rather than a societal issue. Young adult support professionals and industry and policy interviewees expressed concern that this framing may mask broader financial risks, particularly when repeated losses, promotional incentives, and limited financial literacy intersect. These concerns align with recent literature on the financial impacts of sports betting on young adults that finds that sports betting among young adults can cause prolonged economic damage.^{50–52}

Young adults also commonly described how risk varied by bet type, with many young adults viewing certain types of betting as safer. All of the focus group participants reported engaging in Moneyline or single-line bets, and commonly described them as less “risky” than more complex bets, such as parlays and prop bets. Some young adults believed that if they limited themselves to “simple” bets on occasional sporting events, this self-control would be sufficient to protect them from becoming overly involved in gambling. This perception is in contrast to recent research findings that any form of frequent betting can contribute to problem gambling behaviors.⁵³

In addition, young adults’ perceptions of “*responsible*” betting appear to be shaped less by formal financial planning and more by social normalization, self-exemption from potential risk, and the use of heavily marketed “*free bets*” to justify potential loss. Young adults frequently distinguished sports betting from “*gambling*” more broadly. This distinction, reinforced by gamified app design and promotional framing, enables young adults to emphasize control, entertainment value, and social context while discounting any personal risk. As a result, betting-related harm, while recognized by young adults, was framed as something that affects “*other people*” as they and their peers were personally exempt from risk. Nevertheless, while young adults emphasized moderation and responsibility, they simultaneously reflected that they would advise peers not to start betting at all. This tension suggests that continued participation is often driven more by social norms than by perceived value. Together, these dynamics suggest that prevention and harm-reduction efforts that simply reiterate the potential harm of sports betting may be ineffective at properly engaging young adults with sports betting addiction.

Young adults are engaging in sports betting when they are underage, both informally through peer networks and formally through loopholes.

Throughout the interviews and focus groups, young adults frequently discussed how underage sports betting is occurring despite formal age restrictions. Young adults shared how early exposure normalizes sports betting well before legal eligibility. Peers and family members, advertising, fantasy sports, mobile apps, and school or college environments all contribute to the normalization of sports betting well before young adults fully understand age restrictions or potential harms. Knowledge of these age restrictions was also inconsistent and often unclear among young adults. Many participants were either unaware of the legal minimum age or assumed it was 18. This suggests that age-based restrictions may not be effective at curtailing underage sports betting, as many young people have found workarounds to engage regularly despite the law. Young adults shared how underage betting is

facilitated through “loopholes” such as VPNs, offshore and shared accounts, or cross-state access. This indicates that there are gaps in both the enforcement of age restrictions and that the current regulatory barriers are insufficient to prevent underage individuals from sports betting.

Young adults rarely express concern about developing a gambling disorder, despite discussions of multiple behaviors included in the criteria for gambling disorder.

Although young adults acknowledged that some sports bettors engage in problem gambling, they generally perceived their own risk to be low, despite frequently describing behaviors that align with the Diagnostic and Statistical Manual of Mental Disorders, 5th Edition (DSM-5) criteria for gambling disorder.⁵⁴ According to these criteria, a diagnosis requires at least four of the symptoms described in **Exhibit 10**.

Across interviews and focus groups, young adults frequently described “*chasing losses*,” or continuing to place bets to recoup their losses. Many also discussed sports betting as a regular topic of conversation, not only in social settings with friends and family, but also in professional settings as “small talk.” While framed as casual conversations, these interactions suggest a level of preoccupation with sports betting that extends beyond occasional engagement. Financial harm was another recurrent theme. Although most young adults characterized themselves as “*responsible*” due to betting “*in moderation*.” Young adult support professionals highlighted examples of young adults who experienced significant, long-lasting consequences, including having to withdraw from university due to financial hardship. They also identified financial strain as a source of interpersonal conflict and relationship stress. Finally, some young adults expressed ambivalence about their own habits, questioning why they continue to bet on sports even though they acknowledge it is a “*net negative*” and unlikely to “*win big*.” Despite this awareness, few described explicit efforts to cut back or stop gambling. Many of the behaviors shared by young adults align with DSM-5 indicators for gambling disorder and point to a disconnect between perceived and actual levels of risk, with engagement in hazardous gambling known to increase risk for negative mental health consequences.⁵⁵

In addition, young adults acknowledged only momentary effects, such as anger, frustration, or embarrassment, but did not recognize broader mental health impacts associated with sports betting. Although one young adult described feeling “very sad” after losing a bet, none of the participants discussed poor mental health at a level indicating clinical concern. Although many young adults and support professionals acknowledged how frequent sports betting can lead to addiction, there was no explicit connection made between sports betting, gambling disorder, and broader mental health impacts, such as suicide risk.^{56,57,58,59} This is of particular concern given that impulsivity is common among young adults, implying that the mental health consequences of sports betting may be underrecognized by both young adults and supportive adults.

Exhibit 10. DSM-5 Criteria for Gambling Disorder

- Frequent thoughts about gambling
- Need to gamble with increasing amounts to achieve the desired excitement.
- Repeated unsuccessful efforts to control, cut back on or stop gambling.
- Restlessness or irritability when trying to cut down or stop gambling.
- Gambling when trying to escape from problems or negative mood or stress.
- Often gambling when feeling distressed.
- After losing money gambling, often returning to get even. (This is referred to as "chasing" one's losses.)
- Lying to hide the extent of gambling involvement.
- Losing important opportunities such as a job or school achievements or close relationships due to gambling.
- Relying on others to help with money problems caused by gambling

Source: <https://www.psychiatry.org/patients-families/gambling-disorder/what-is-gambling-disorder>.

Young adult support professionals do not feel that they receive adequate training, resources, or support to address young adult sports betting.

None of the young adult support professionals reported feeling adequately prepared to support students or young adults struggling with sports betting-related harms. They noted that it is rare to find training, resources, or best practices that explicitly address sports betting behaviors among young adults. Only one athletic department reported having invited a speaker to discuss their negative experiences with sports betting; the other support professionals were only aware of more general gambling resources that were typically not tailored to young adults or sports betting. Several participants explained that, if they were working with a young adult struggling with their sports betting, they would default to referring them externally for mental health treatment due to a lack of awareness of specialized treatment approaches or interventions tailored for sports betting. While some research indicates that Cognitive Behavioral Therapy (CBT) and Dialectical Behavior Therapy (DBT), both typical approaches used in mental health treatment, both hold promise for addressing behavioral addictions like gambling, participants emphasized that addressing gambling risk more broadly may be insufficient to account for the distinct risks that mobile sports betting poses, notably the constant accessibility and socially-driven normalization.^{60,61}

Young adults and young adult professionals described harm-reduction approaches, similar to those used to address substance use, as being more credible and preferable for supporting individuals with problem gambling.

According to the NCAA, harm reduction strategies in sports betting and gambling “foster prevention, risk reduction and health promotion. Harm-reduction strategies acknowledge actual behaviors (e.g., some student-athletes do bet on sports) and attempt to meet individuals where they are.”⁶² When

discussing effective strategies for reducing sports betting-related harms among young adults, participants and CAB members consistently emphasized the importance of a harm-reduction approach that acknowledges the extent to which sports betting is culturally embedded in young adults' social lives. They noted that prevention efforts should address the normalization of sports betting within peer networks, media, and digital platforms. They also believed that messaging should explicitly recognize the prevalence of sports betting behaviors and be developmentally appropriate, reflecting young adult values, social norms, and decision-making. Participants also drew parallels to substance use prevention education on college campuses, highlighting how abstinence-only and risk awareness messaging have been ineffective and often outright ignored by students as unrealistic or out of touch.⁶³ On the other hand, harm reduction was viewed as more credible. Young adults described how providing clear, accurate information about risks, promoting safer behaviors, reducing stigma, and encouraging help-seeking would resonate more with their age group than strict prohibition and moralizing messages.

For collegiate athletes in particular, participants emphasized the need for stronger enforcement of NCAA regulations prohibiting student athletes from sports betting. However, young adult support professionals and young adults proposed an alternative approach centered around harm reduction. They recommended implementing amnesty policies and graduated consequences to encourage student athletes at risk to seek help for the negative impacts of their sports betting. Support professionals suggested that a first offense or voluntary self-disclosure could instead result in education, referral to treatment, and other harm-reduction strategies rather than automatic loss of eligibility. They also acknowledged that this approach would facilitate earlier intervention and could prevent the progression into gambling addiction. Although several systematic reviews examined harm reduction strategies in in-person gambling, fewer studies have explored effective approaches to harm reduction for online gambling.^{64,65} Our findings offer considerations for implementing a harm-reduction approach tailored to collegiate athletes, a population with unique risk and protective factors.

Strengths and Limitations

This study offers several strengths that enhance the credibility and relevance of the findings. The study employed systematic thematic analysis, cross-coding for consistency, and iterative refinement of the codebook, which enhanced reliability and depth of interpretation. Overall, findings provide nuanced, real-world perspectives on how legalization interacts with social norms, technology, and community dynamics, offering actionable insights for policy and program development. The qualitative findings from this research study enabled us to “understand phenomena [i.e., behaviors, programs, interventions or treatments, systems, and/or health conditions] within their context... uncover links among concepts and behaviors... and generate and refine theories.”⁶⁶ Furthermore, the findings provide context for the complex, not easily measurable impacts of the legalization of sports betting in Massachusetts.⁶⁷ In addition, the study addresses a critical gap in the literature by focusing on young adults, a group that is disproportionately exposed to sports betting advertising and thus at increased risk for gambling-related harms.

Another key strength was the engagement of a CAB throughout all phases of the study to ensure that the research design, data collection, and interpretation reflect the lived experiences and priorities of young adults and community stakeholders. Additionally, involving the CAB members and community interviewers in sensemaking added cultural relevance and strengthened the validity of findings. Finally, Phase 1 of our research design, which included interviews with policymakers, vendors, advocacy organizations, and service providers, provided a comprehensive understanding of the sports betting landscape before we began engaging young adults in data collection.

However, the study also has several limitations that should be considered when interpreting these findings. First, this study used a qualitative design with a purposive sample of young adults in Massachusetts. Therefore, findings are not intended to be generalizable to all young adults in the state or in other areas and are not intended to be generalizable beyond the place, population, and time studied.^{viii} Instead, they seek in-depth knowledge and perspectives on the specific program, event, policy, or intervention. Furthermore, local policies, community resources, and cultural factors unique to Massachusetts may shape experiences and perceptions of sports betting, limiting the generalizability of findings beyond the state. The relatively small number of interviews also limits the representativeness of the sample, further constraining generalizability. In addition, the majority of young adult interview and focus group participants were female (56%), which is in contrast to national data that indicates sports betting participation skews more male than female. Despite our best efforts to recruit more male participants, particularly those who were active sports bettors, our sample reflects the well-documented challenges of recruiting young men into research studies.

In addition, there could be self-report bias in the findings. Data were based on self-reported experiences and perceptions, which may be subject to recall bias or social desirability bias, particularly regarding sensitive topics such as gambling behaviors. Despite efforts to recruit a diverse sample, the study may not fully capture the perspectives of individuals at highest risk for gambling-related harms, such as those with existing gambling disorders. Finally, this study reflects attitudes and behaviors during the early stages of sports betting legalization in Massachusetts. Perspectives may change as the landscape of sports betting continues to evolve.

NORC Recommendations

Sports betting has increasingly become normalized within young adult social circles and overall culture, driven by mobile access, aggressive advertising, peer networks, and social contexts. Rather than relying solely on individual responsibility, effective regulation is needed to reshape the landscape of sports betting, especially given young adults' developmental stage, financial risks, and mobile habits. MGC, policymakers, vendors, educational institutions, community organizations, and other interested

^{viii} Some young adult support professional interviews took place during November 2025 when there was a temporarily approved NCAA rule change to allow collegiate athletes and staff to bet on professional sports. This proposed change likely impacted the interviewees' perspectives during this time.

parties should consider the following opportunities for shaping future policies and programs related to sports betting that reduce potential harms to young adults.

Recommendation 1: Strengthen Statewide Education and Public Awareness on Gambling Harms

Young adults consistently held the view that sports betting is low-risk and distinct from gambling. They were also largely unaware of gambling disorder criteria and frequently discounted their own risk while nonetheless recognizing risk for “others.” Therefore, there is a need for additional education and awareness related to potential gambling-related harms associated with sports betting and its impact on young adults. This may include working with partners, community organizations, and other entities to:

- **Launch statewide public education campaigns:** Develop PSAs and public awareness campaigns modeled after anti-smoking or substance use PSAs, tailored to young adults. Messages to highlight include: how even small, casual bets can accumulate over time; how app design, promotions, and gamification obscure risk; and how to identify early warning signs (e.g., chasing losses, secrecy, and preoccupation). These messages should normalize help-seeking, destigmatize gambling harms, and clearly identify resources for support. They should also highlight sports betting as a form of gambling, not just entertainment.
- **Fund message testing with young adults:** Consider testing the language of campaigns to determine if it resonates with young adults (18-25). Moralizing or abstinence-only messaging should be avoided in favor of more realistic, harm-reduction language. These campaigns should also explicitly connect sports betting to risks for gambling, addiction, and mental health.
- **Integrate gambling education into existing young adult environments:** This could include gambling risk education being provided in college settings through a similar format of existing alcohol/substance use modules, financial literacy classes, and orientation programming. Additionally, K-12 schools should be encouraged to address the risks of early exposure to sports betting through sports, gaming, and social media.

Recommendation 2: Regulate Sports Betting Advertising and Promotions

Advertising was consistently described as pervasive, inescapable, and appealing to young adults and underage populations. It is reinforced through celebrities, influencers, and promotional framing. The ubiquity of advertising, especially on social media and during sports broadcasts, is a driving force behind young adults’ exposure to and engagement with sports betting. States regulate how sportsbooks vendors operate, but advertisement legislation is less specific. In Massachusetts, in alignment with the Responsible Gaming Framework (RGF), promotional communications related to gambling cannot target persons younger than 21 or individuals on the voluntary self-exclusion list, or market on college campuses. In addition, gambling licensees must prominently display signs of problem gambling, how to access assistance, and how to opt out of marketing.²¹ The state can consider working with sportsbook operators to:

- **Restrict advertising placement:** Limit or restrict sports betting advertisements on social media and streaming platforms with substantial users under 21. Also, advertising near college campuses and college-dense neighborhoods should also be limited. In addition, limiting advertising during games and live sporting event broadcasts can reduce exposure.
- **Tighten advertising content standards:** This could include prohibiting the use of celebrities, athletes, influencers, or other internet personalities that are popular with young adults. Additionally, restrictions should be placed on language that emphasizes “free money” or other “risk-free” framing. Requirements can also include that ads present sports betting as gambling, not as entertainment or a skill-based activity.
- **Mandate prominent risk disclosures:** Standardize disclosure size, duration, and placement in advertising. There should be a clear indication of risk for addiction, links to support services, and warnings about risky behaviors (e.g., chasing losses, impulsive betting).
- **Increase oversight of influencer marketing:** This could include monitoring covert advertising on social media sites, enforcing penalties for misleading or undisclosed promotions, and requiring operators to report on their advertising strategies and audience demographics.

Recommendation 3: Strengthen App-Based Safeguards Using Opt-Out Defaults

Young adults reported rarely using voluntary self-exclusion tools and often ignoring prompts and disclaimers. MGC may consider how they can:

- **Shift play management tools to default-on settings** and require sportsbooks to implement default daily and weekly spending limits, default session time limits, and mandatory “cool off” prompts after losses. Users should only be allowed to change these limits through a multi-step process.
- **Implement loss-based interventions**, such as alerts triggered when users experience large single-day or cumulative losses. These alerts should also trigger when a user quickly increases their betting frequency. Apps can also include pauses or temporary restrictions after reaching certain loss thresholds.
- **Require transparent spending dashboards** that clearly and prominently display weekly, monthly, and lifetime net losses, as well as comparisons among deposits, wins, and withdrawals. This information should be presented in both plain language and visual formats.
- **Strengthen self-exclusion approaches** by expanding awareness and ease of use. The self-exclusion options should be promoted more proactively, not just at sign-up. These approaches should be enforced across all sports betting platforms.

Recommendation 4: Expand Access to and Awareness of Gambling-Specific Support Services for Young Adults

Both young adults and support professionals reported limited awareness of available problem gambling support services. They also mentioned how there is a lack of age-appropriate and sports betting-specific services, as well as insufficient guidance for counselors, educators, and other support professionals. To address these gaps, MGC can:

- **Invest in young adult-specific treatment and support** by funding digital tools tailored for young adult audiences, peer-led and campus-based support models, and telehealth options for gambling treatment.
- **Improve professional and provider training and screening**, which could include developing and disseminating screening tools for sports betting and guidance for youth-serving support professionals. Gambling questions should also be included in routine intake assessments.
- **Increase visibility of services**, such as requiring sportsbooks to prominently list services within apps, rather than burying them in the disclaimer language that is often ignored. Sportsbooks can also deliver targeted prompts and alerts when risky behavior is identified.
- **Provide education for parents and trusted adults** on how to identify warning signs of problematic sports betting behaviors, encourage safer habits, promote financial literacy, and facilitate connection to treatment.

Recommendation 5: Address Underage Betting and Regulatory Loopholes

Young adults frequently mentioned workarounds and “loopholes” to access sports betting, including shared accounts, VPNs, offshore platforms, prediction markets, and quasi-legal platforms, as well as a misunderstanding of the legal age. To address these, the state can:

- **Strengthen age verification and enforcement**, which can include enhancing identity verification across platforms. There should also be monitoring of repeat device usage, shared payment methods, and other circumvention tactics.
- **Increase clarity on legal age** by requiring all ads and online platforms to prominently state “You must be 21 or older to legally bet.” This language should also be included in public awareness campaigns.
- **Examine emerging loopholes**, such as prediction markets, social sportsbooks, and fantasy sports. Coordinate with other regulators to address these gray-area platforms that mimic and encourage gambling behaviors.

Recommendation 6: Adopt Harm Reduction Approaches for Collegiate Athletes

Although NCAA regulations deter most betting among student athletes, zero-tolerance policies discourage disclosure, delay intervention, and increase risk among these students. Instead, MGC can:

- **Partner with colleges and NCAA stakeholders** to encourage amnesty or graduated response policies for first offenses and provide education and treatment referrals instead of immediate loss of eligibility. This includes creating confidential reporting pathways.
- **Address harassment and promote athlete well-being** by encouraging leagues and broadcasters to reduce gambling-focused commentary tied to individual athletes and support anti-harassment initiatives.

Recommendation 7: Invest in Ongoing Research, Monitoring, and Evaluation

Sports betting is rapidly evolving, and although early evidence suggests risks, especially for young adults, ongoing research is needed. MGC can help to:

- **Quantify young adult prevalence and risk factors** using large-scale surveys and mixed methods approaches to estimate prevalence and identify risk factors for problem gambling among young adults.
- **Support longitudinal research**, including funding studies to examine how sports betting behaviors and associated harms evolve over time. This can include tracking initiation, escalation, and cessation, as well as mental health, financial, and academic outcomes. This research should specifically focus on youth and young adults.
- **Evaluate regulatory and intervention effectiveness** by studying the impact of advertising limits, app-based safeguards, and campus-based interventions.
- **Prioritize equity** by examining disproportionate impacts on young men, college students, communities of color, and low-income young adults. Engage young adults and other individuals in participatory research to ensure the research is nuanced and tailored to young adult contexts and needs.

Conclusion

This study provides an in-depth exploration of young adults' perspectives on the legalization of sports betting in Massachusetts, capturing young adults' viewpoints, sports betting behaviors and the factors influencing those behaviors, impacts of the legalization of sports betting, and potential mitigation strategies. The findings from this study have important implications for policy, practice, and public health. Overall, the findings suggest that while sports betting is often viewed as a benign or even positive activity, its rapid integration into young adult culture raises important considerations and concerns. The normalization of sports betting among young adults, largely driven by legalization, targeted advertising, and mobile accessibility, underscores the need for proactive measures to prevent gambling-related harms for young adults. As sports betting becomes more embedded in everyday life, especially for young adults, it is critical to ensure that policies and programs are in place to protect their well-being. Policymakers and other interested parties should prioritize proactive measures to prevent gambling-related harm, particularly among populations most vulnerable to targeted marketing and financial risk.

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Recruitment and Outreach Flyers

Appendix A. CAB Recruitment Flyer

JOIN OUR COMMUNITY ADVISORY BOARD!

We are looking for Massachusetts residents to share their perspectives, knowledge, and experience to design a research study about the impacts of the legalization of sports betting among young adults, ages 18-25. We are seeking adults of any age (18+) that either engage with young adults and/or are familiar with sports betting to join our Community Advisory Board. This study is funded by the Massachusetts Gaming Commission and is being carried out by NORC and Gemini Research.

NO PREVIOUS RESEARCH EXPERIENCE NEEDED.

Why join the Community Advisory Board?

- Help shape the research study by sharing your point of view about the recent legalization of sports betting and informing the study design and data collection protocols.
- Network and build relationships with our research team and other Community Advisory Board members.
- Learn research methods and skills.
- Receive compensation of \$600 for your participation over the next year.

Estimated time commitment:

- About 2-4 hours per quarter (with some flexibility based on your availability). This includes:
 - Providing written and/or verbal feedback on specific questions related to study materials.
 - Participating in quarterly **virtual** focus groups with the research team and other Community Advisory Board members.
 - These focus group meetings will occur in October 2023, January 2024, March 2024, and May 2024.
- We will offer meetings at convenient times that work for the majority of group members and attempt to accommodate your schedule.

Interested? Questions?

Please click on the link or scan the QR code below and complete the survey. Once completed, research staff will reach out to contact you about next steps.

- Survey link: https://norc.az1.qualtrics.com/jfe/form/SV_3CqG5RWnA9wYre6.

If you have questions, please contact the research team via e-mail at MassCommunityStudy@norc.org.



GEMINI RESEARCH

Appendix B. Young Adult Interviews Recruitment Flyer

GET \$75 TO SHARE YOUR THOUGHTS ON SPORTS BETTING!



We are looking for young adults (18–25 years old) who live in Massachusetts to share their opinions on sports betting. No sports betting experience required.

What will you be asked to do?
Complete a 30-minute interview via Zoom to share your opinions on sports betting and how it affects young adults in your community.

Participants will receive:
Participants will get a \$75 Amazon, Walmart, Target, AMC, or Mastercard gift card via email.

Are you eligible?

- 18–25-years old
- Live in Massachusetts for a majority of the year
- Can comfortably communicate in English, Spanish, Portuguese, or Chinese



<https://is.gd/Flyer1>

Who are we?
This study is funded by the Massachusetts Gaming Commission and is being carried out by NORC at the University of Chicago, an independent, nonprofit research organization. We are working collaboratively with a community advisory board to develop and implement this study.

 at the University of Chicago

Want to participate?
Scan the QR code or go to the link to answer a few questions and provide your contact information. A team member will reach out to you to schedule the interview!

For more information, please contact:
MassCommunityStudy@norc.org

Appendix C. Young Adult Social Media Recruitment Ads

NORC is looking for adults ages 18-25 who live in Massachusetts to share their opinions on sports betting in a short Zoom interview. This study is funded by the Massachusetts Gaming Commission and is being carried out by NORC, a trusted research organization. Click "Learn More" to get started!



[HTTPS://NORC.AZ1.QUALTRICS.COM/JFE/FORM/SV_42...](https://norc.az1.qualtrics.com/jfe/form/sv_42...)

Massachusetts Residents: Share Your Voice!

Sports Betting Study Screener

[Learn more](#)

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Appendix D. Young Adult Focus Group Recruitment Flyer

GET \$150 TO SHARE YOUR THOUGHTS ON SPORTS BETTING!



We are looking for young adults to share their opinions and experiences with sports betting. Sports betting experience required.

What will you be asked to do?

Complete 2 brief reflection surveys about your sports betting habits and participate in a 90 minute focus group via Zoom.

Participants will receive:

You will receive a \$150 gift card if you complete the 2 reflection surveys and participate in the focus group.

Are you eligible?

- Can communicate in English
- Experience engaging in sports betting

Who are we?

This study is being carried out by NORC at the University of Chicago, a nonprofit research organization. We are working with young adult community members to develop and carry out this study.



Want to participate?

Scan the QR code or go to the link [here](#). If eligible, we will reach out to you to schedule the focus group!



For more information, contact us at
MassCommunityStudy@norc.org

This study is funded by the Massachusetts Gaming Commission, an organization that funds studies to assess the impact of gambling in Massachusetts.

Discussion Guides and Journaling Questions

Appendix E. Interviews with Sports Betting Policymakers, Vendors, and Researchers

Consent

Hello, my name is [NAME]. Thank you very much for taking the time to speak with us today. I work for NORC at the University of Chicago, a nonprofit research group. We were funded by the Massachusetts Gaming Commission to conduct a community perspectives study about the impacts of the legalization of sports betting in Massachusetts on young adults ages 18-25. We are collaborating with a community advisory board of young adults and organizations that serve them to refine our study goals and questions.

The purpose of today's interview is to hear your perspective on the current landscape of and any impacts associated with legalized sports betting on young adults broadly and in the Commonwealth. We are also interested in learning about steps that have been or could be taken to mitigate potential harms to young adults.

A few things before we get started:

- We will make sure to complete the interview within the 60 minutes that we have scheduled.
- We are interested in hearing about your experiences and opinions. There are no right or wrong answers. It is also okay for you to decide not to answer or skip a question for any reason. It is also okay to stop the interview at any point.
- We are conducting multiple interviews for this study. Findings from these interviews will inform our design report and interview guide. Aggregate findings may also be included in a public-facing final report. We will not include your name, organization, or any other personally identifying information in any report, even if we include a quote.
- We would like to audio record this conversation, strictly for note-taking purposes. The notes and recording will be stored on NORC's secure server and will only be used by our project staff. Neither your name nor any other identifying information about you will be shared with anyone outside of the project team.

Do you have any questions?

Do you consent to participate in the interview?

Is it okay if we audio record this conversation?

- [If YES, start recording and say]: Great, we have started the recording.

- [If NO, say]: That's fine, we will just take detailed notes.

Interview Guide

Introduction

1. To start, please tell us your name, your organization, and your role at your organization.
2. How do(es) you/your organization interact with sports betting (e.g., policy oversight or administration; vendors; and/or serving individuals who engage in sports betting) locally or nationally?

Current Context of Sports Betting

Our first set of questions explore the current context of sports betting for young adults in Massachusetts since legalization in August 2022 and licensed casinos, racetracks, simulcast centers, and online vendors started operating under state licenses in 2023.

Young Adults and Sports Betting

3. How has awareness of sports betting changed since legalization (2022) and/or operationalizing state licenses (2023)?
 - a. What are the contributing factors to these changes?
 - b. Have any of these factors influenced young adults, specifically? How?
4. To what extent have young adults engaged in sports betting *[in Massachusetts]* since it was operationalized in 2023?
 - c. What are the main avenues for young adults to engage (e.g., online/mobile, licensed casinos, other operators, online bookies)?
 - d. Why might young adults prefer certain types of sports betting (i.e., online versus in-person)?
 - e. What was sports betting like for young adults *[in Massachusetts]* prior to its legalization?
 - f. *In Massachusetts*, how often did young adults participate in sports betting prior to legalization.
5. What language are young adults using to talk about/describe sports betting? (e.g., gaming, wagering, fantasy sports)

Advertising

6. What have been the main outlets for sports betting advertising to young adults in the past year?
 - a. Influencers and social media

7. How are advertisers targeting young adults?
 - a. Which specific young adult demographics/identities are retailers/operators targeting in these campaigns (e.g., gender, race/ethnicity, socio-economic, students)?
 - b. To what extent are college students a target audience for sports betting advertisement?
 - c. To what extent are non-English speakers a target audience for sports betting advertisement?
 - d. To what extent are there differences between advertisements for women and men?
 - e. To what extent are there differences for advertisements for young adults who have not previously been involved in other forms of gambling?
 - f. To what extent are there regional differences [*across Massachusetts*] for advertisements?
 - g. To what extent are there differences for advertisements for those previously involved in other forms of gambling?

Rolling out of Sports Betting

Our next few questions ask for your perspective on changes or impacts you have observed in the state with respect to gambling and betting behaviors, particularly among young adults, over the past year in Massachusetts.

8. What has **worked well** about the rolling out of sports betting for young adults [*in Massachusetts*]?
 - a. Have you noticed any differences among different populations of young adults?
 - i. [Prompts:]
 1. Among individuals for whom English is a second language?
 2. Among college students?
 3. By gender?
 4. Among individuals who have not previously been involved in other forms of gambling?
 5. By different regions [*of Massachusetts*]?
 6. By urban vs rural?
 7. Among first or second generation young adults?
 8. Among those underage (18-20)?
 9. Among different income levels, especially those in a lower income level?
 10. Among young adults with substance use addictions?
 11. Among young adults with parents/family that gamble?
 12. Among athletes?
9. What has **not worked well** about the rolling out of sports betting in Massachusetts for young adults [*in Massachusetts*]?
 - b. Have you noticed any differences among different populations of young adults?
 - i. [Prompts:]

1. Among individuals for whom English is a second language?
 2. Among college students?
 3. By gender?
 4. Among individuals who have not previously been involved in other forms of gambling?
 5. By different regions [of Massachusetts]?
 6. By urban vs rural?
 7. Among those underage (18-20)?
10. To what extent have concerns or issues surfaced related to sports betting and the health/well-being of young adults over the past year?
- a. Mental health
 - b. Substance use
 - c. Problem gambling/addiction
 - d. Underage betting
 - e. Social connections/sense of community
 - f. Financial struggles
 - g. Related to their education
11. To what extent have the ways in which individuals engage in gambling and betting behaviors [*in Massachusetts*] changed since sports betting was legalized?
- a. [Prompts:]
 - i. Online versus retail in-person
 - ii. Among young adults
 - iii. Pre-game betting vs during-game betting
 - iv. Aggressiveness of betting strategies

Differences from Other Gambling

These next few questions ask about sports betting in comparison to other types of gambling such as casino gambling or the lottery.

12. How might sports betting effect young adults' health and well-being differently than other types of gambling?
- a. Mental health and well-being
 - b. Substance use
 - c. Social
 - d. Economic
 - e. Problem gambling
 - f. Education
 - g. Relationships

13. Why would a young adult choose to engage in sports betting instead of other forms of gambling?

Mitigating Potential Harm for Young Adults

14. What steps are governmental, advocacy, and other oversight organizations taking to mitigate potential harms for young adults?
- a. How are these policies designed to mitigate potential harms of sports betting?
 - i. What makes these policies specific to young adult sports bettors?
 - b. What has worked well with the harm mitigation/regulatory approach that the *[state/other entities]* implemented?
 - c. What could be improved about these policies and oversight approaches?
15. *[If applicable]* To what extent is *[state/operators/your organization]* taking any steps to prevent underage betting?
- a. What are some of the common loopholes for underage betting?

Wrap-up Questions

16. What policies are needed to mitigate any potential harmful effects of sports betting on young adults?
- a. *[Prompts]*
 - i. For the Massachusetts Gaming Commission?
 - ii. For state and local governmental organizations?
 - iii. For sports betting retailers (online and in-person)?
 - iv. For organizations/advocacy groups that serve young people?
17. Is there anything else you'd like to discuss about sports betting that we have not asked?

Closing

Thank you for your time.

Appendix F. Interviews with Young Adults

Consent

[Interviewer notes are in red throughout the guide]

Hello, my name is *[Name]*. Thank you very much for your time today. I am working with NORC, a nonprofit research group. We are funded by the Massachusetts Gaming Commission to do a study on the perspectives of young adults ages 18 to 25 on the impact of legalization of sports betting in Massachusetts.

Our team worked closely with a group of community members of young adults and organizations that serve them to develop study goals and questions. The purpose of today's interview is to hear your perspective on sports betting in the Commonwealth and its effects on young adults.

A few things before we get started:

- We are interested in your thoughts and personal experiences. There are no right or wrong answers. Feel free to share any personal examples, perspectives, or things you've heard from other friends or peers in your network.
- Your participation is voluntary. It is also okay for you to decide not to answer or skip a question for any reason.
- The interview will take around 30 minutes and you will receive a \$25 gift card for your participation in this study.
- We plan to interview many young adults for this study. We will develop a high-level summary and report based on what we hear from everyone we interview.
- We will not include your name or any other identifying information in our report, even if we include a quote. Any identifying information collected for the purposes of scheduling or providing you with a gift card will be stored separately from your data.
- We would like to audio record this conversation, strictly for note-taking purposes. The notes and recording will be stored on NORC's secure server and will only be used by our project staff. The recording will be destroyed once the study is complete. Neither your name nor any other identifying information about you will be shared with anyone outside of the project team.

Is it okay if I audio record this conversation?

[If no] No problem; please be patient as I take notes during the interview.

[If yes] Great, thank you. [Begin the recording, if prompted remember to save to the cloud].

Do you have any questions for me about the information I shared?

Do you consent to participate in this interview?

[If no] Thank you for your time. If you choose not to consent, then we will need to end the interview at this time. *[End interview with participant and close Zoom]*.

[If yes] Great, let's get started.

Interview Guide

Introduction

1. To start, what are your views on legalized sports betting?

Context of Sports Betting

Our first set of questions explore the current context of sports betting for young adults in Massachusetts since legalization in August 2022 and licensed casinos, racetracks, simulcast centers, and online vendors started operating under state licenses in 2023.

*[If the individual noted in the screener that they have placed bets on sports, ask the set of questions under **Sports Bettor**. If they have never placed bets on sports, skip to the set of questions under **Not Sports Bettor**]*

In the project screener you noted that you have placed bets on sports before, is that correct?

[If yes, proceed to the [Sports Bettor] section]

[If no, proceed to the [Not Sports Bettor] section]

[Sports Bettor]

2. Why do you bet on sports?
 - a. Which bet types (e.g., futures, props, mainlines) do you prefer?
 - b. How much money are you wagering on a standard bet?
 - i. How often do you bet on sports?
 - c. What outlets do you use to place bets?

- i. *[If interviewee does not describe types of outlets, Prompt:]* Online/mobile? In-person at casinos? Online bookies? Other operators?
- d. Which sports are you more likely to bet on?
- e. Do you do other related activities like fantasy sports, daily fantasy sports, or other types of gambling (e.g., lottery, casino, poker, racetrack)? If so, which ones?

[Not Sports Better]

- 2. Why don't you bet on sports?
 - a. Which bet types (e.g., futures, props, mainlines) do your friends or peers prefer?
 - b. How often are your friends or peers betting on sports?
 - c. What outlets do your friends or peers use to place bets?
 - d. Which sports are your friends or peers more likely to bet on?
 - e. Do your friends or peers do other related activities like fantasy sports, daily fantasy sports, or other types of gambling (e.g., lottery, casino, poker, racetrack)? If so, which ones?

Advertisement

- 3. Have you become more aware of sports betting since 2023?
 - a. *[If interviewee says they have – Prompt]* What brought about this change?
 - b. Are you aware of age restrictions in sports betting?
- 4. Where do you and your friends/peer see ads about sports betting?
 - a. Do you feel like ads are targeting specific groups or types of people (e.g., young adults, certain sex, gender, race or ethnicity, socio-economic status, age)? If so, who?
 - b. *[If interviewee describes hearing about sports betting through celebrities or social media – Prompt]* To what extent do social media influencers or celebrities affect your interest in sports betting?
 - c. To what extent is the messaging or advertising prevalent on college campuses?
- 5. Other than ads, what other ways have you seen sports betting being promoted?
 - a. *[If interviewee asks for clarification or examples – Prompt]* Providing 'free money' or incentives for betting? Social media users providing price picks

Impact of Legalization of Sports Betting

- 6. How has sports betting changed for young adults since its legalization in Massachusetts in 2023, if at all?

- a. [If interview talks about positive effects, then ask about negative. If they talk about negative, ask about positive. If they do not talk about either, ask both questions. If they cover both, you do not need to ask these questions – Prompt]*
- i. What have been the positive effects of the legalization?
 - ii. What have been the negative effects of the legalization?
7. What types of changes have you personally experienced or seen among your friends or peer groups due to the legalization of sports betting?
- a. [The following prompts are just examples of changes – you do not need to ask them all, only if some of these have come up in conversation and you'd like the interviewee to elaborate on them - Prompts]*
- i. Financial
 - ii. Physical health
 - iii. Mental health
 - iv. Substance or alcohol use
 - v. Other forms of gambling
 - vi. Social networks, connectivity, or loneliness
 - vii. Personal relationships
 - viii. Education or schoolwork or employment
 - ix. Interest in sports

Closing

Research has shown that engagement in sports betting can lead to gambling-related harms such as relationship harms (e.g., conflict within relationships, neglect of responsibilities), health harms (e.g. stress, depression, reduced sleep), emotional/psychological harm (e.g., feelings of regret, worthlessness, failure).

8. What steps are being taken to reduce the potential negative effects of sports betting on young adults?
- a. Who should be responsible for reducing these effects?
 - i. *[If interviewee asks for clarification or examples – Prompt]* Vendors? State government? Local governments? Universities? Community organizations?
 - b. To what extent are you or your friends/peers aware of resources to help support people who would like help with the negative effects of gambling?
9. What would you like to see happen or change in Massachusetts to address the potential negative effects of sports betting on young adults?
10. Is there anything else you'd like to share with me before we go?

In-depth Community Engagement

We may be doing a second part to this study in the spring where we contact individuals to share more in-depth perspectives based on some of the key themes from these discussions. Individuals who take part in the second part of this study will be compensated for their time.

- Are you willing to be contacted to participate in this additional study component if it occurs?
 - *[If yes]* Please provide the best way to contact you.

Incentive Payment

As I noted earlier, you will receive an electronic \$25 gift card for your participation in this study. Gifts cards can be sent to you electronically via email, text, or mail.

- Which type of gift card would you prefer: Mastercard, Walmart, Target, Amazon, or AMC?
- Would you prefer to receive the gift card via email, text, or mail?
- Please provide your *[email address, cell phone number, or mailing address]* where you would like to receive your gift card.
 - *[If needed, ask participant to spell out the email]*

Referrals

- Do you know other young adults in Massachusetts that would be interested in being part of this study?
 - *[If yes]* Would you please provide their name and contact information (e.g., phone number or email of the person(s) you think would be interested in participating in the study) so that we can reach out to them to be part of this study?
 - *[If they do not want to share the contact information]* You can have them email masscommunitystudy@norc.org.
- Do you have any final questions for me before I let you go?

Thank you for your time!

Appendix G. Interviews with Young Adult Support Professionals

Consent

[Interviewer notes are in red throughout the guide]

Hello, my name is *[Name]* and I'm joined by my colleague *[Name]*. Thank you very much for your time today. We work for NORC, a nonprofit research organization. We are funded by the Massachusetts Gaming Commission to do a study on the impact of the legalization of sports betting in Massachusetts on young adults ages 18 to 25.

Our team worked closely with a group of young adult community members and youth-serving organizations to develop our study goals and questions. The purpose of today's interview is to hear your perspective on the current landscape of sports betting, the impact of its legalization, and the effects on young adults in the Commonwealth. We are also interested in learning about steps that have been or could be taken to reduce potential risks for young adults.

A few things before we get started:

The interview will take no more than 60 minutes. Your participation is voluntary.

We are interested in your thoughts and personal experiences. There are no right or wrong answers. It is also okay if you decide not to answer or would like to skip a question for any reason.

These interviews are part of a larger study that has included interviews with policymakers, vendors, and researchers, as well as interviews and focus groups with young adults.

We will develop a high-level summary and report based on what we hear from everyone we speak with.

We will not include your name or any other identifying information in our report, even if we include a quote. Any identifying information we collected for the purposes of scheduling will be stored separately from your data.

We would like to audio record this conversation, strictly for note-taking purposes. The notes and recording will be stored on NORC's secure server and will only be used by our project staff. The recording will be destroyed once the study is complete. Neither your name nor any other identifying information about you will be shared with anyone outside of the project team.

Do you have any questions for me about the information I shared?

Do you agree to participate in this interview?

[If no] Thank you for your time. If you choose not to consent, then we will need to end the interview at this time. *[End interview with participant and close Zoom]*.

[If yes]: Is it okay if I audio record this conversation?

[If no] No problem; please be patient as I take notes during the interview.

[If yes] Great, thank you.

[Begin the recording. If prompted, remember to save to the cloud].

Interview Guide

Introduction

We'd like to get started with some introductory questions.

3. Briefly describe your role *[at school, if applicable]* and how you typically engage with young adults as part of your role.
4. What are your views on legalized sports betting in general?

Context of Sports Betting

The next set of questions explores the current context of sports betting for young adults in Massachusetts. Specifically, we'd like to talk about how sports betting has changed since legalization in August 2022 and since licensed casinos and online vendors started operating under state licenses in 2023.

5. How would you describe the current landscape of sports betting among young adults ages 18 to 25 in Massachusetts?
 - a. What trends have you noticed regarding young adults' involvement in sports betting? (**Probes:** *trends in frequency, platforms used, social attitudes*)
 - b. How has this changed since the legalization of sports betting?
6. How would you describe the "culture" of sports betting among young adults?
 - a. Culture of sports betting among men
 - b. Culture of sports betting among women
 - c. [If applicable] Culture of sports betting on college campuses

7. Now we'd like to talk about how young adults typically engage in sports betting.
 - a. What are the main ways in which young adults engage in sports betting (e.g., online/mobile, licensed casinos, other operators, online bookies)?
 - i. **Prompt, if needed:** Is there anything else that you have noticed about how young adults interact with online sports betting platforms?
8. To what extent are there specific groups or demographics that are engaging more in sports betting than others?
 - a. Men
 - b. College students
 - i. How does this group compare to young adults not in college?
 - c. College athletes
 - i. Are there ways that college athletes engage with sports betting that are different from how other students do? If yes, please describe.
 - ii. [If applicable]: Since the legalization of sports betting, have you seen any shifts in how college sports are perceived by the campus community? If yes, please describe.
 - iii. How about any changes in the experience of attending college sports events since the legalization of sports betting?
 - d. Underage sports bettors: We also want to talk about underage sports bettors. As a reminder, sports betting in Massachusetts is legal for anyone 21 years and older.
 - i. From your perspective, how widespread is underage sports betting?
 - ii. How are underage (18–20-year-old) young adults accessing and engaging in sports betting?
 - iii. How do underage young adults use workarounds to access sports betting platforms?

Impacts of Legalization of Sports Betting

9. What are the impacts of the legalization of sports betting on young adults?
 - a. What have been the positive effects of the legalization?
 - b. What have been the negative effects of the legalization?
10. How has the legalization of sports betting affected:
 - a. Mental health and substance use
 - b. Problem gambling/gambling addiction
 - c. Risky or reckless behavior

- d. Social connections/sense of community
 - e. Relationships with friends and family
 - f. How young adults engage in and with sports
 - g. Education or employment
 - h. Physical health
 - i. Personal finances
11. How are these impacts similar to or different from other forms of gambling (e.g., casinos, lottery, scratch tickets)?
12. To what extent are there differences in how different groups of young adults are impacted?
- a. **Probes:** *This could include differences by gender, age, race, if someone is a college student or not, and if they're an athlete or not.*

Advertisement

13. What have been the main outlets for sports betting advertising in the past year?
- a. To what extent are advertisers targeting specific groups (e.g., age, gender, race, etc.)?
 - b. **Prompt, if needed:** To what extent is sports betting advertising prevalent on college campuses or at college sporting events?
 - c. What are the impacts of sports betting advertisements on young adults?

Role and Experience in Addressing Sports Betting

14. How do you see your role in working with or supporting young adults who bet on sports?
15. To what extent have you encountered situations where young adults have discussed their sports betting with you?
- a. How do you currently address sports betting when a young adult brings it up?
 - b. **[If needed – Prompt]** How do young adults typically respond when asked about their sports betting habits?
16. What types of resources or supports do young adults who bet on sports request?
- (Probes: mentorship, counseling, other help)**
- a. Which of these types of resources or supports do you provide young adults who have gambling concerns?
 - b. What other resources are needed to help young adults who are struggling with the negative effects of gambling?

17. To what extent do you feel prepared to provide support for young adults who are struggling with sports betting?

- a. What resources have been helpful for you when you are supporting young adults who bet on sports?
- b. What additional resources or guidance would be helpful to you?

Policy/Recommendations

Research has shown that engagement in sports betting can lead to gambling-related harms, including with relationships, health, personal finances, and emotional/ psychological harm.

18. What would you like to see happen or change in Massachusetts to address the potential negative effects of sports betting on young adults?

- a. What specific policies are needed to address the negative impacts of sports betting on young adults?
- b. Who should be responsible for these efforts?
 - i. [If interviewee asks for clarification or examples – Prompt] Vendors, State government, Local governments, Universities, Community organizations, Advocacy groups, and Sports betting operators

19. Is there anything else you'd like to share with me before we wrap up?

Wrap Up

As part of our study, we will be conducting focus groups with young adults who engage in sports betting.

20. Do you have any recommendations for ways to conduct outreach to young adults to engage them in this research? Are there specific organizations or contacts you would recommend?

- c. [If yes] We would greatly appreciate it if you could introduce your contact to us via email. Your virtual introduction will help us connect with them more intentionally and thoughtfully. When doing so, please use the email address MassCommunityStudy@norc.org.

21. Do you have any final questions for me before we sign off?

Thank you for your time!

Appendix H. Focus Groups with Young Adults

Young Adult Focus Group Facilitator Guide – Young Adults General (Aged 18-25)

MGC Sports Betting Study

Facilitator:	
Note-taker:	
Date & Time:	

Introduction and Consent (10 minutes)

Project Background

Good morning/afternoon. Thank you for joining us today for this focus group. My name is [FACILITATOR NAME]. I will be leading the discussion and am joined by my colleague, [NOTETAKER NAME], who will be taking notes. We work for a non-profit research organization called NORC at the University of Chicago.

We are funded by the Massachusetts Gaming Commission to do a study on the impact of the legalization of sports betting in Massachusetts on young adults ages 18 to 25.

Our team worked closely with a group of young adult community members and youth-serving organizations to develop our study goals and questions. The purpose of today's focus group is to hear your perspectives on the current landscape of sports betting, the impact of its legalization, and the effects on young adults in Massachusetts. We are also interested in learning about steps that have been or could be taken to reduce potential risks for young adults.

Consent

Now I have some consent language that I will read through before we get started. During our time together, we ask that you be open and honest about issues of concern and importance to you. We are interested in all perspectives and appreciate your input. The focus group will last up to 90 minutes. We have several questions that we would like to ask you today, and so I may move the conversation along in the interest of time.

Your participation is completely voluntary. You may choose to skip any questions or stop your participation at any time. There are no consequences for you if you want to stop.

Our discussion today is confidential. That means we will not include your name in any of the reports we develop or attribute any specific comments you make to you. However, while we

ask participants to keep today's discussion confidential, there is the chance that comments may be attributed to you outside of this setting by another participant here today.

We will be recording and transcribing the discussion today using Zoom's recording features. No one will have access to the recording except for the NORC team. After we complete the discussion, we will send you a \$150 e-gift card to thank you for your participation.

Do you have any questions? [[Answer Questions](#)]

[[Obtain Verbal Consent to Participate & Record](#)]

Do you voluntarily agree to participate in this discussion? Please come off mute and verbally say yes.

Do we have your permission to record the discussion?

[[Notetaker starts recording](#)]

Introduction and Icebreaker (10 minutes)

If you have not completed the reflection, please use the link shared in the chat to take some time after this discussion to fill it out.

[Send link to final reflection in Zoom chat]

1. To start off, please introduce yourself by your first name and share to what extent are sports a part of your daily life?
 - a. For those of you in a college or university, to what extent are sports a big part of campus life at your college or university?
2. What are your overall thoughts on the legalization of sports betting in Massachusetts?

Awareness and Engagement (15 minutes)

Now let's talk about how you engage with sports betting.

3. Among people your age, how common is betting on sports?
4. What types of bets do you or people you know usually make (e.g., single-game, parlays, prop bets)? Why do you choose these types of bets?
 - a. How often do you place bets on sports?
 - b. What sports betting platforms (like DraftKings, FanDuel, etc.) do you use?
 - i. **Prompt, if needed:** How do you determine which platform to use?
 - ii. **Prompt, if needed:** How easy or difficult is it to access these platforms?
 - c. To what extent do you use other trading or prediction market apps such as fantasy sports, Kalshi, Polymarket?

5. What types of professional sports do you typically bet on?
 - a. How often do you place bets on college sports?

Motivations (15 minutes)

Now let's talk about why you bet on sports.

6. When did you first become interested in sports betting or start learning about it?
 - a. How old were you when you started betting on sports?
7. What typically gets people your age interested in sports betting?
 - a. **Prompt, if needed:** For example, you consider it to be fun, for the competition, making money, peer influence, promotions, social media.
8. Where do you typically see sports betting ads or promotions (e.g., bonus bets)?
 - a. To what extent have sports betting promotions or ads influenced your decision to start or continue betting?
 - i. **Prompt, if needed:** What types of promotions or ads do you see?
 - b. **For college students:** To what extent do you see sports betting ads around your college or university campus?
 - i. **Prompt, if needed:** What types of promotions or ads do you see around your campus?
 - ii. Are the promotions or ads that you see around your campus different from those you see other places? If yes, please explain.

Impacts (15 minutes)

We want you to think about your engagement with sports betting since its legalization in Massachusetts in 2023.

9. Since the legalization of sports betting in Massachusetts, what changes, if any, have you noticed in your own habits or those of your peers?
10. Has sports betting had any effect on you or your day-to-day life? If so, in what ways?
 - a. **Prompts, if needed:**
 - i. Stress levels or mental health
 - ii. Relationships or social life
 - iii. Employment
 - iv. Alcohol consumption or other substance use
 - v. Finances
 - vi. **For college students:** Academics?
 - b. **Prompt:** How, if at all, is sports betting incorporated into your personal budgeting?

11. In what ways do you think sports betting has impacted the sports experience for athletes? How about for fans/people watching sports?
 - a. **For college students:** How has sports betting changed the college sports experience for college athletes? How about for students?
12. How often do you discuss your sports betting with your friends/peers?
13. How often do you discuss your sports betting with your parents or family members?

Risk Awareness and Responsibility (10 minutes)

Let's talk about things you do when betting isn't going so well.

14. When it comes to sports betting, what helps you keep your betting under control? What makes it harder to do so?
 - a. **Prompt, if needed:** What resources or tools do you use, if any, to help manage your betting frequency or the amount you spend?
 - b. What additional resources would be helpful for you or your peers if they were struggling with negative impacts of sports betting?
15. To what degree do you feel like young adults are adequately informed about the risks of sports betting?
 - a. **For college students:** To what degree do you feel college students are adequately informed about the risks of sports betting?
 - b. **Prompt, if needed:** What advice would you give to another young adult who is thinking about getting into sports betting?

Policy and Perceptions (5 minutes)

16. If you could change anything about how sports betting is regulated for young adults, what would it be?
 - a. **For college students:** How about for college students? How about for underage college students?
 - b. How about for sports betting advertisements?
17. Who should be responsible for these changes?
 - a. **For college students:** In what ways could colleges or universities play a role in educating students about how to maintain control over their betting?
 - b. **Prompt:** Are there other institutions or organizations that could play a role in educating young adults about sports betting involvement?

Wrap up (5 minutes)

We're coming to the end of our discussion.

18. Is there anything else you'd like to share about your experience or views on sports betting?

Thank you all so much for your input and contribution to this discussion. As promised, we will be emailing you a code for a \$150 e-gift card in the days following this session as a token of our appreciation.

As we mentioned, your input will inform the recommendations that we will develop and share with the Massachusetts Gaming Commission related to the impact of sports betting on young adults. In the meantime, if you have any questions following the interview, don't hesitate to reach out to me by email. My email address is in the chat *[notetaker put the email address of moderator in chat box]*.

If you would like to stay a little longer to debrief or talk, we will remain on the line. Otherwise, we hope you enjoy the rest of your day.

Appendix I. Reflection Exercise Questions

Sports Betting Journaling – Part 1

Personal Habits & Patterns

1. When do you usually place bets? Select all that apply.
 - a. In the morning
 - b. During the day
 - c. At night
 - d. Right before a sporting event
 - e. During a sporting event
 - f. Other, please specify: _____

2. Where do you usually place bets? Select all that apply.
 - a. At school
 - b. At home
 - c. At work
 - d. At a restaurant/bar or other social setting
 - e. Other, please specify: _____

3. How much time do you spend engaging in sports betting each week?
 - a. Less than 5 minutes
 - b. 6-15 minutes
 - c. 16-30 minutes
 - d. 31-60 minutes
 - e. Roughly an hour
 - f. Roughly 2 hours
 - g. 3 hours or more

4. How many days per week do you typically engage in sports betting?
 - a. 1 day per week
 - b. 2 days per week
 - c. 3 days per week
 - d. 4 days per week
 - e. 5 or more days per week

5. What types of bets do you usually make? Select all that apply.

- a. Moneyline
- b. Point spread
- c. Totals (Over/Under)
- d. Proposition (prop) bets
- e. Parlay
- f. Future
- g. Live (In-Play)
- h. Teaser
- i. Each-Way
- j. Forecast/Tricast
- k. Round Robin
- l. Other, please specify: _____

6. Which apps do you use to sports bet? Select all that apply.

- a. FanDuel
- b. DraftKings
- c. BetMGM
- d. Caesars Sportsbook
- e. Bet365
- f. Fanatics Sportsbook
- g. ESPN BET
- h. Other, please specify: _____

Financial Impact

7. On average, how much do you typically spend on sports betting in a week?

- a. Under \$10
- b. \$11 – \$25
- c. \$26 – 50
- d. \$51 – \$100
- e. \$101 – \$250
- f. \$251 - \$500
- g. Over \$500

8. On average, how much do you win each week?

9. On average, how much do you lose each week?

10. Have you ever had to make financial trade-offs (e.g., skipping purchases, using savings, borrowing money, selling things) because of sports betting?
- h. Yes
 - i. No
 - j. Unsure
 - k. Prefer not to say

Narrative Open-Ended Questions

11. Share a memorable experience you've had while sports betting. This could be positive (for example, winning a big bet that you didn't think would hit) or negative (for example, losing more than you expected on a game). In 1-2 sentences, share what happened, how you reacted, and what emotions came up for you (for example, excitement, satisfaction, regret, anxiety, etc.)
12. Think about how you feel when you win money on a sports bet versus when you lose. In 1-2 sentences, describe how these feelings influence your next bet.

Sports Betting Journaling – Part 2

[Day 1-7]

1. Did you place a bet on sports today?
- a. Yes
 - b. No

[If No to 1]

2. What made you choose not to bet today?
(consider what influenced your decision, for example, time, money, mood, priorities, or something else)
3. How did that make you feel?
(In a few sentences or less, write about your emotions, for example, did you feel relieved, proud, frustrated, indifferent, etc.)
4. On a scale of 1-5, how do you feel about your decision not to bet today?
- a. 1 – very negative
 - b. 2 – negative
 - c. 3 – neutral
 - d. 4 – positive
 - e. 5 – very positive

[If Yes to 1]

5. How many sports bets did you place today?
 - a. 1
 - b. 2
 - c. 3
 - d. 4
 - e. 5 or more

6. How much time did you spend sports betting today?
 - f. Less than 10 minutes
 - g. 10 – 30 minutes
 - h. 31 – 59 minutes
 - i. 1-2 hours
 - j. Over 2 hours

7. How much did you spend on sports betting today?
 - a. Under \$10
 - b. \$10 – \$50
 - c. \$51 – \$100
 - d. \$101 – \$500
 - e. Over \$500

8. What led you to bet today?
(Think about triggers, for example, excitement, boredom, social influence, wanting to win, etc.)

9. How did you feel before placing the bet? How about after?
(In a few sentences or less, write about your emotions and thoughts and how they may have changed before and after placing the bet. For example, did you feel relieved, proud, frustrated, indifferent, etc.)

10. On a scale of 1-5, how do you feel about your decision to bet today?
 - k. 1 – very negative
 - l. 2 – negative
 - m. 3 – neutral
 - n. 4 – positive
 - o. 5 – very positive

[End of week reflection – one time on day 7]

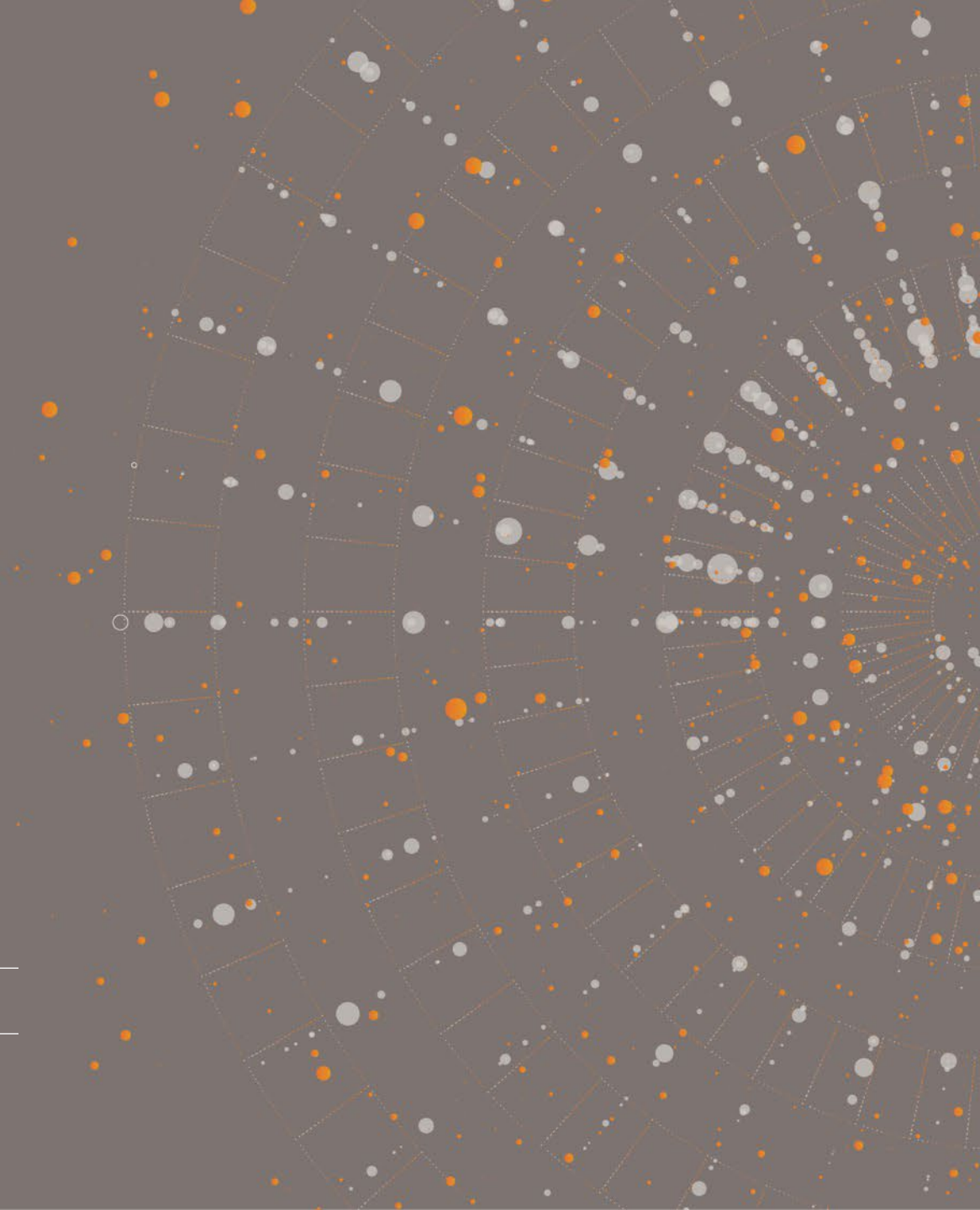
1. Looking back on this week:

- What patterns stand out in your sports betting behavior (or your choice not to bet)? Did you notice any routines (e.g. betting during games, after work or class, when bored)?
- How did your sports betting (or choice not to bet) influence your mood, stress levels, or daily activities?
- What, if anything, did you learn about yourself through this week's experiences with sports betting that was surprising or notable?

Perspectives on Sports Betting among Young Adults in Massachusetts

August 27, 2026

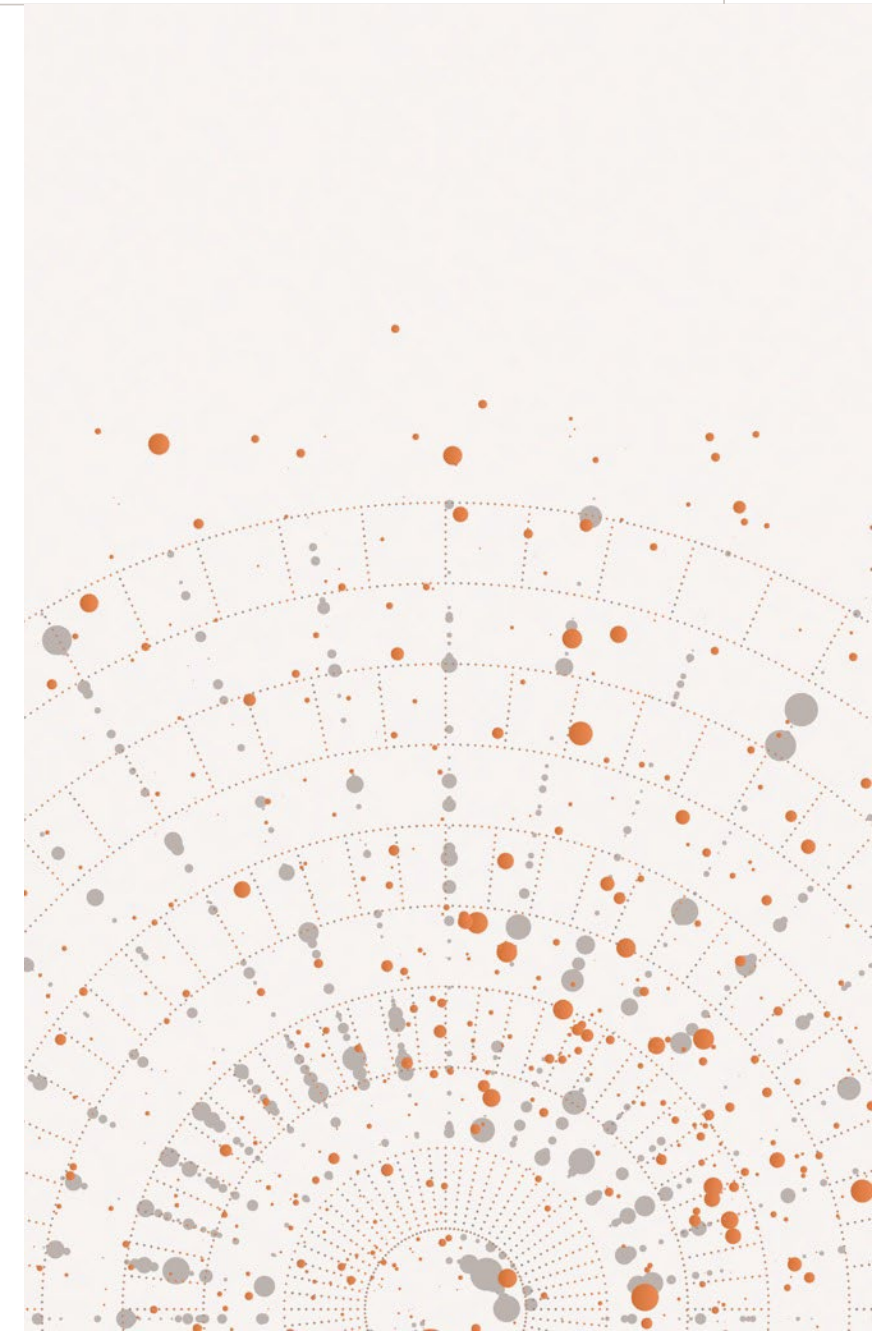
NORC at the University of Chicago



Introduction and Methods

The Massachusetts Gaming Commission (MGC) funded NORC to conduct a community-engaged research study to examine research questions including:

- What are young adults' perspectives on sports betting?
- How are young adults engaging in sports betting?
- What factors influence young adults' engagement with sports betting?
- How has legalized sports betting affected young adults in Massachusetts (e.g., social, economic, well-being)?
- What policies or programs may mitigate negative effects of and/or support the well-being of young adults who bet on sports?



The study's approach is based on NORC's Community-Engaged Research Framework

Community engaged-research approach:



• **Engaged 15** community members throughout the study to participate in a Community Advisory Board (CAB)



• **Co-developed** research questions, study design, and study materials, and conducted **participatory analysis** with the CAB



• **Recruited and trained 2 young adult community interviewers** to facilitate **peer-to-peer** discussion

Researcher-Community Partnership



© 2023 NORC

Source: Adapted from the Culturally Responsive Evaluation Framework and based on principles adapted from various frameworks for community-engaged research

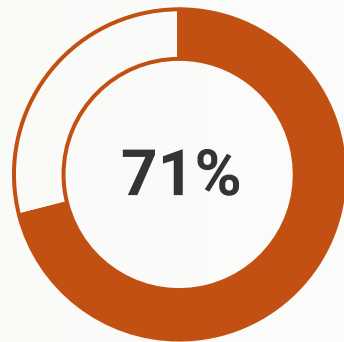
From 2023-2026, NORC conducted a qualitative research study comprised of interviews and focus groups

- Interviews with **12 sports betting researchers, policymakers, and vendors** to provide context on retail and online sports betting in Massachusetts and inform study design.
- Perspectives from **62 young adults** (ages 18 to 25), including 39 interviews and 5 focus groups with 23 young adults to understand their experiences with and perspectives on sports betting.
- Interviews with **6 young adult support professionals** (e.g., College Counseling Center Directors, Athletic Directors, mental health clinicians) on potential impacts of sports betting on young adults and inform recommendations.

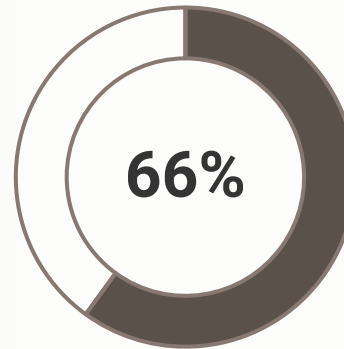
Among the 62 young adult study participants, most bet on sports, over half were female, and the majority were White

Among the 62 young adult participants...

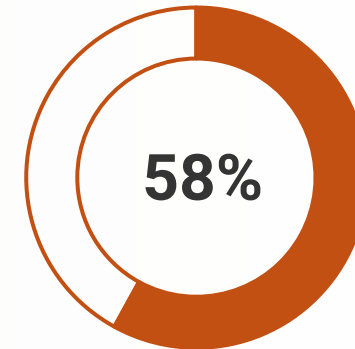
Bet on Sports



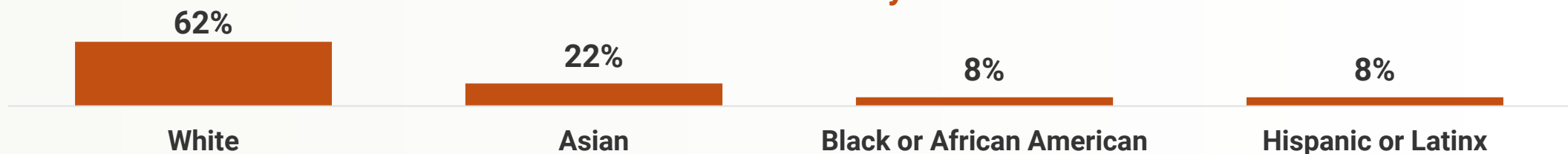
Ages 21-25



Female

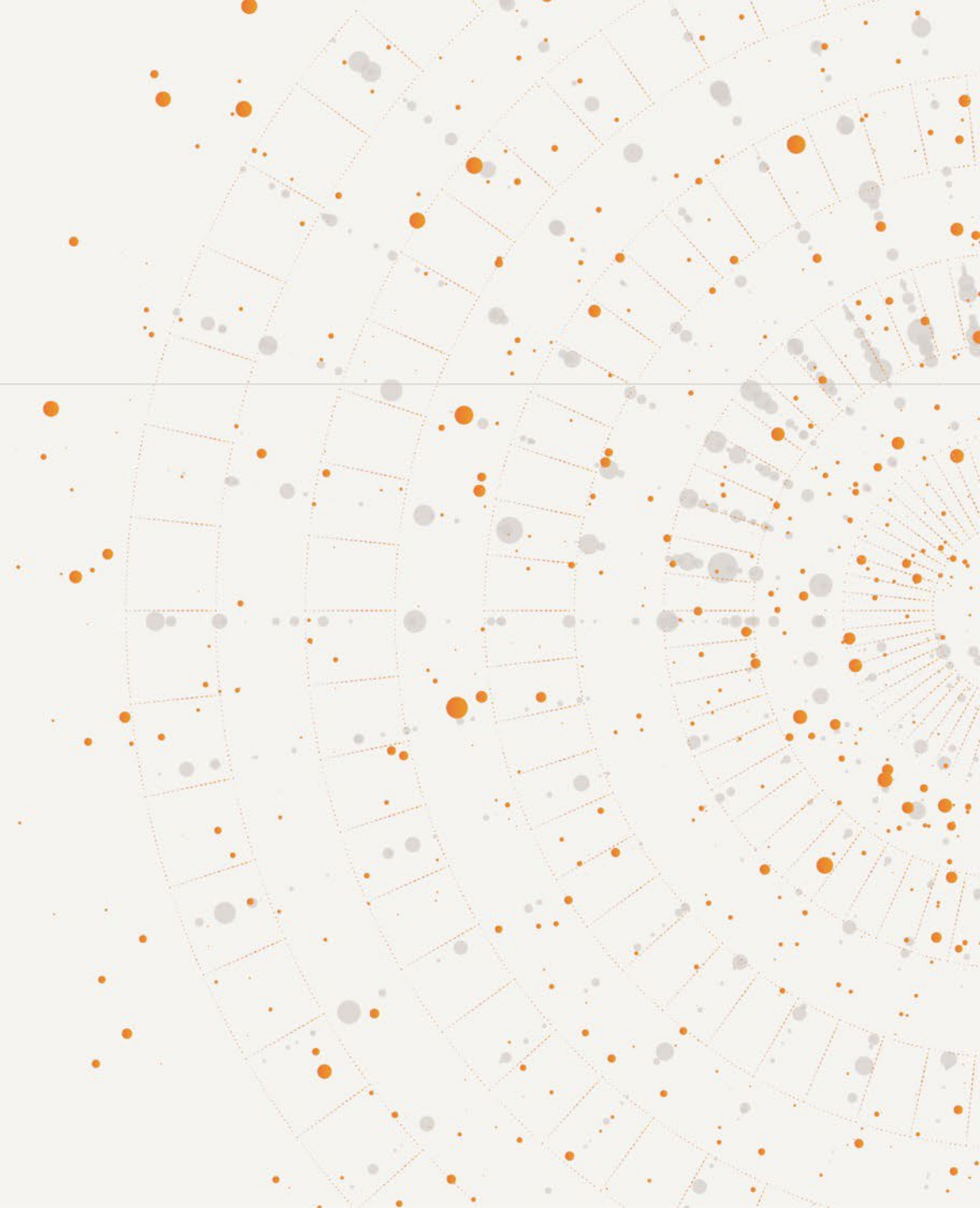


Race/Ethnicity



Key Findings

Patterns of sports betting behaviors among young adults



Most young adults engage in sports betting “casually” and “infrequently,” wagering less than \$10, and using mobile apps

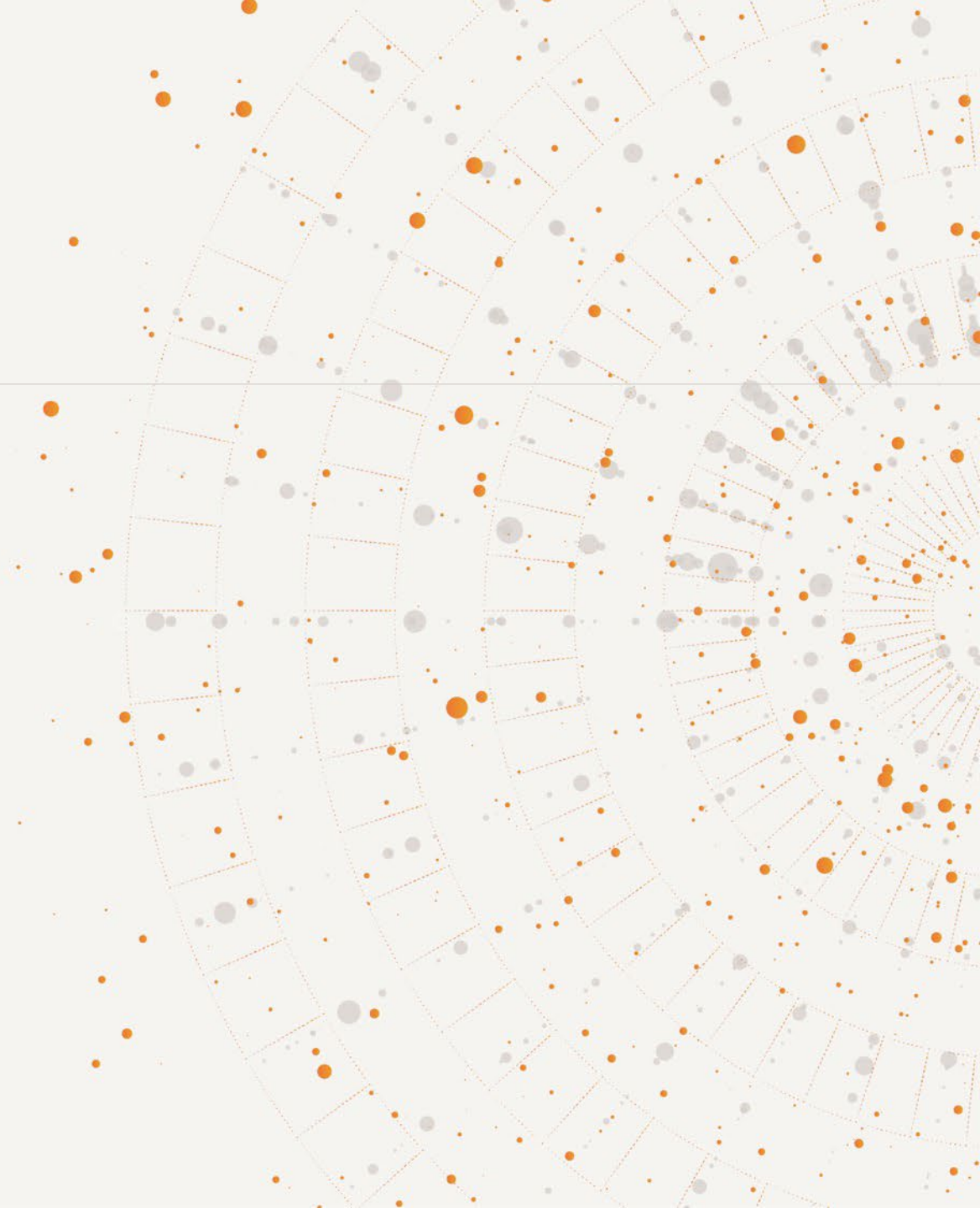
- Most engage in sports betting **casually**, with increased engagement around sporting events
 - Standard bets range from \$0.50 - \$10; a few wager more than \$50
 - Betting behaviors ranged from daily to at least once per week
- Sports young adults bet on varied, but bet types consisted primarily of **Moneyline** bets and occurred mostly **online**
 - Young adults bet on a range of sports, but **football and basketball** most common
 - **Moneyline** bets perceived to be more simple, less risky
 - Young adults primarily use **mobile platforms**, with DraftKings most frequently cited; several young adults noted leveraging informal peer networks and bookies
- Young adults also engage in other related activities

— “ —

“The type of bet I usually do is just go for the winner or top 5/top10 of the major PGA [Professional Golfers' Association] events happening throughout the year. I don't have enough confidence to make the parlays or anything big like that.”

- Young adult focus group participant

How Young Adults Perceive Sports Betting



Young adults perceive sports betting as a **low-risk, casual** form of entertainment

Benefits

Perceive betting as a social activity

- Bolsters social connectedness
- Increases engagement with sports

Betting generates income and state revenue, and enhances consumer protections

Harms

- Negative financial impacts
- May lead to addiction

Young adults recognize risks associated with sports betting, but downplayed or exempted themselves and peers from these risks

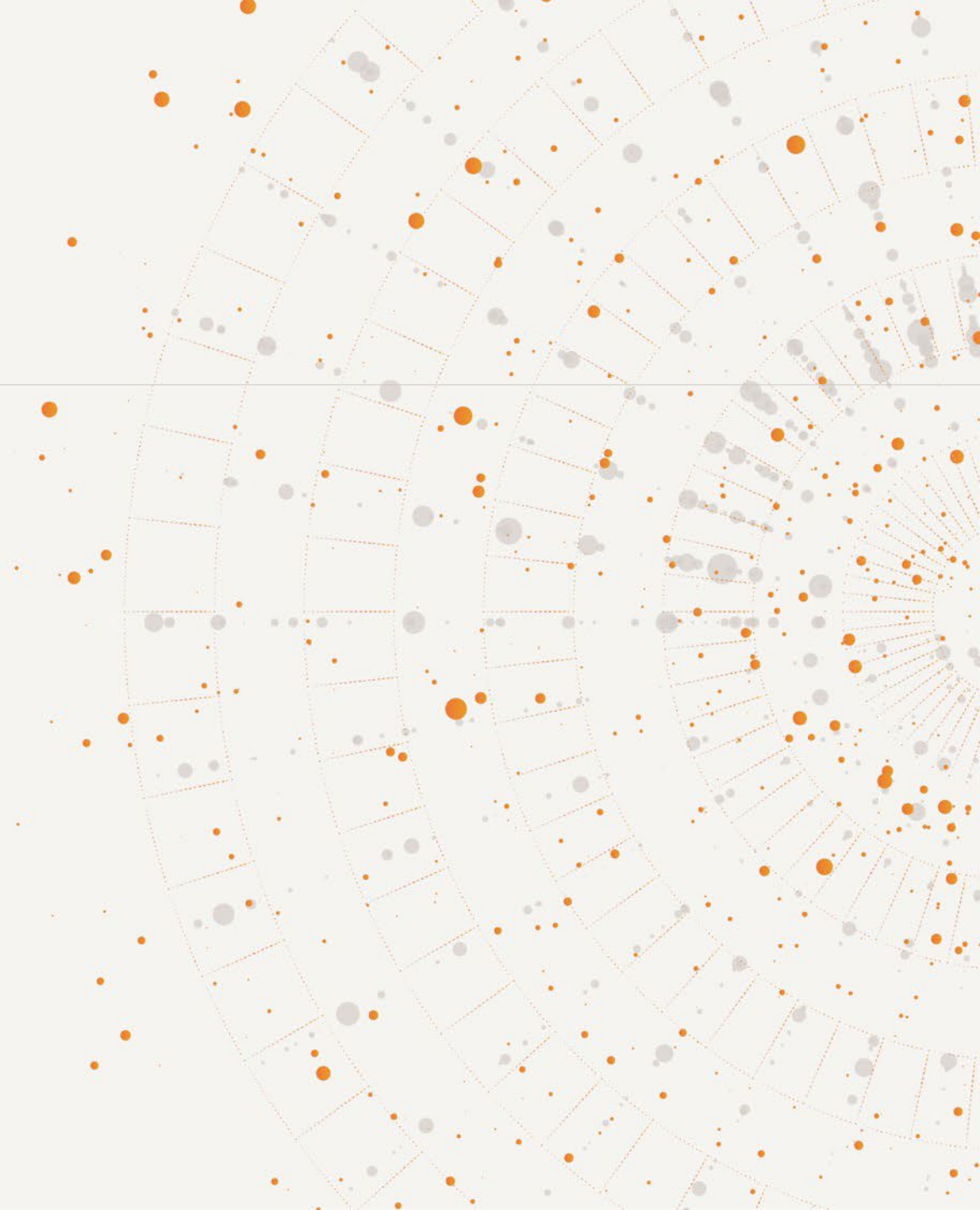
- Equate sports betting with making discretionary purchases



“I think that it can get out of hand pretty quickly if you don't monitor it, so I think that having proper regulations around it can be important... With proper regulations, it can be a fun pastime.”

- Young adult focus group participant

How the Normalization of Sports Betting Shapes Risk



Sports betting is widely perceived as normalized, driven by its ubiquity and social embeddedness

- **Social context** and **peer influence** contribute to normalization
 - Strongly held belief among young adults that sports betting fosters shared conversation and camaraderie
 - Word of mouth, peer influence, and family dynamics spread interest and generate participation
- Proliferation of **mobile and online platforms** increase **accessibility** and **frequency** of placing bets
 - Described as “frictionless” and “immediate”
 - Convenience and access of mobile apps increase prevalence and use



“I'd say 90% of my friends here gamble. My male friends here gamble. It's a lot of people, a lot of college students are definitely into sports betting.”

- Young adult interview participant

Pervasive advertising and promotional incentives contribute to normalization and engagement

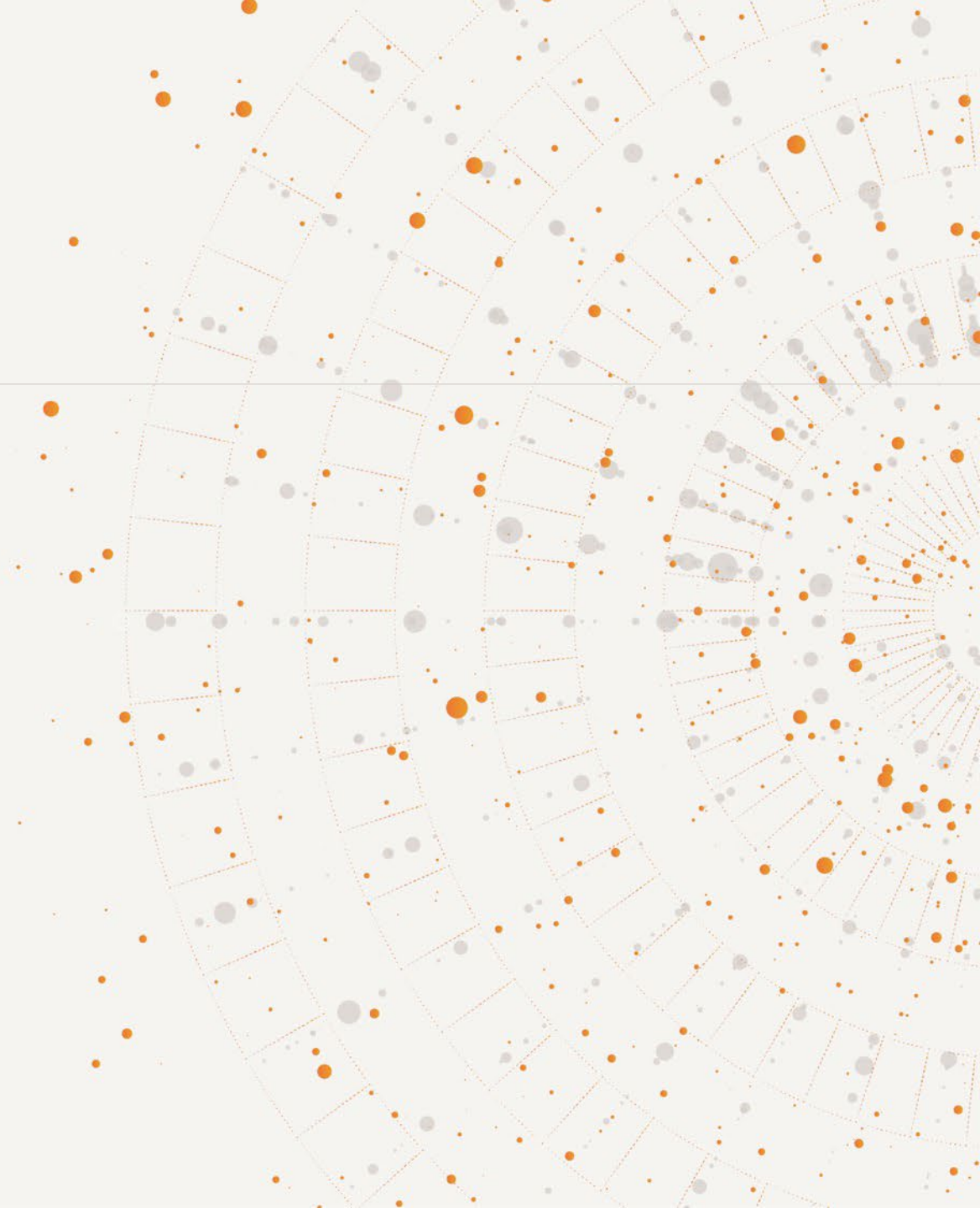
- **Widespread exposure to ads on social media platforms, mobile apps, podcasts, and streaming services**
 - Ads embedded into sports viewing experience
- **Promotional strategies framed as “free money” especially enticing for young adults with limited income**
 - Young adults choose which app to use based on promotions
 - Promotions persuasive, but often viewed as not delivering on what they promise
- **Ads target and feature young people**
 - Persuasive when they feature celebrities and influencers
 - Target mostly men, but young women are increasingly featured in ads
 - Young adults concerned about the impact of ads on young audiences



“It is interesting that a lot of the marketing and stuff towards college kids, I feel like, is heavy, when most of them probably can't legally bet.”

- Young adult focus group participant

Differential Experiences Across Groups



Experiences vary across subgroups of young adults

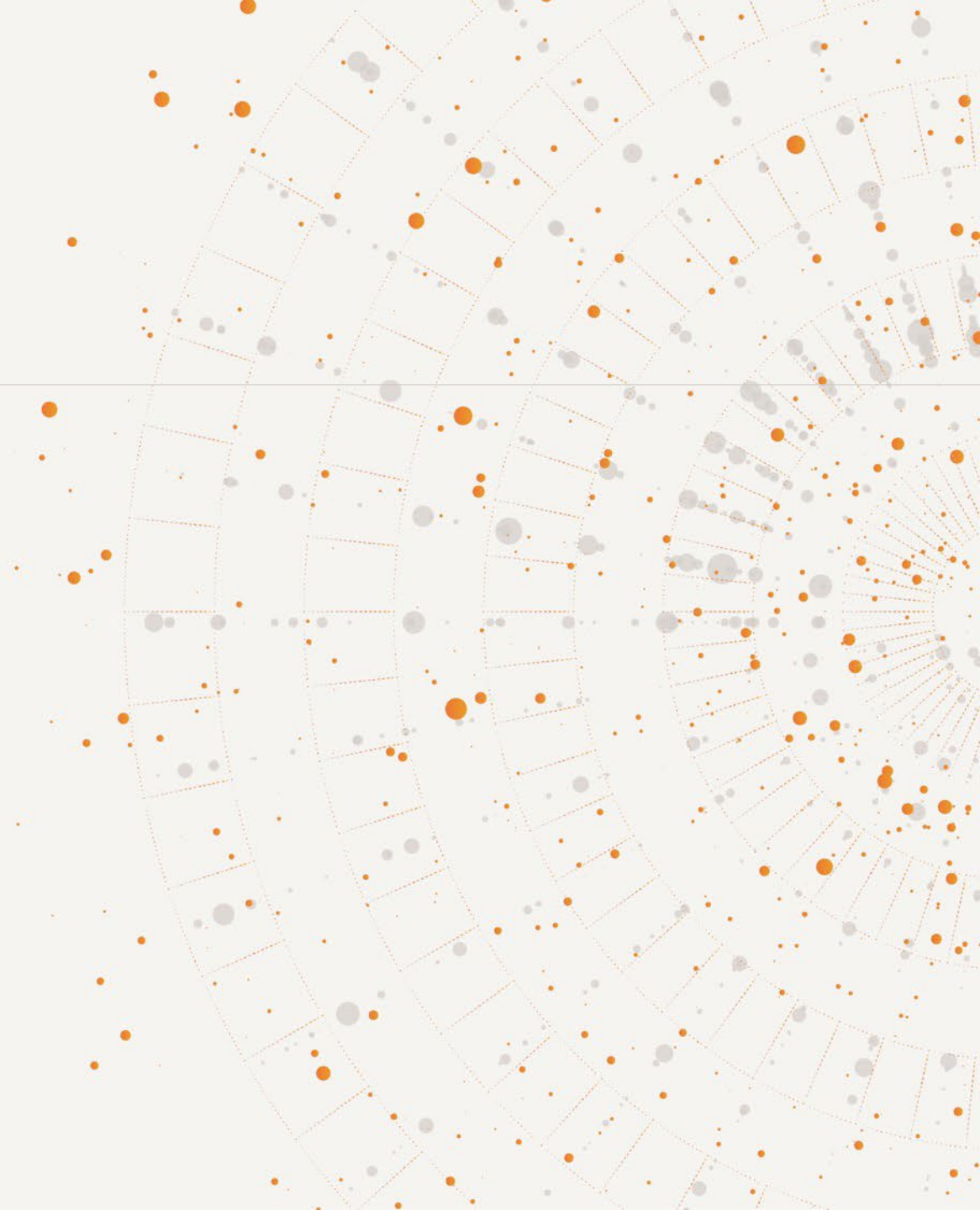
- **Underage young adults are engaging in sports betting despite restrictions**
 - Loopholes include fake IDs, offshore accounts, VPNs, or informal networks and bookies
- **Young adults perceive that sports bettors are primarily men, but believe young women's engagement is increasing**
- **Campus culture and word of mouth facilitate betting on college campuses, particularly within "sports schools"**
 - Collegiate athletes deterred from betting by NCAA restrictions, but young adults expressed concern for mental health impacts of sports betting on the athletes



"I was first exposed to it when I was in college, especially since my boyfriend was in Greek life, and was very big in sports, and all of his friends were very big sports fans, so I was just around it a lot. And then especially when it was legalized a couple years ago, it really exploded."

- Young adult focus group participant

Opportunities to Mitigate Risks and Potential Harms



Awareness of existing resources and supports for problem gambling is limited

Young adults report limited awareness of existing supports

- Awareness largely limited to helplines and disclaimers
- Many questioned whether current resources are effective
- Responsibility is viewed as shared across government, vendors, colleges, communities, and individuals

Young adult support professionals reported feeling underprepared to address sports betting harms.

- Receive insufficient training, resources, and support services



Vendors



Government/
Policymakers



Community



Individuals



Colleges/
Universities

Participants suggested multiple avenues for mitigating harms among young adults

Opportunities for prevention and protection

- Expand education and public awareness campaigns
- Increase visibility of support resources on apps, campuses, and public websites
- Improve financial literacy and responsible gambling education

Strengthen safeguards and policies

- Implement stronger in-app tools (spending limits, activity summaries, warnings)
- Enhance advertising oversight and consumer protections
- Consider policies addressing underage access and high-risk betting behaviors



Vendors



Government/
Policymakers



Community



Individuals



Colleges/
Universities

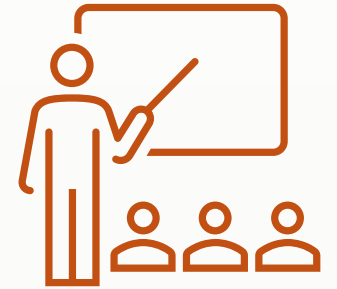
Discussion and Recommendations

What does this all mean?

- The normalization of sports betting is reinforced by **widespread advertising, easy mobile access, and peer influence**.
- Young adults often engage in sports betting because they perceive it as **low risk** and believe they have **high personal control** over their betting behavior.
 - Young adults recognized risks such as financial loss, impulsive betting, and addiction, including behaviors consistent with DSM-5 indicators of gambling disorder.
 - Despite these risks, most participants viewed problem gambling as something that affects other people, not themselves.
 - Discussion of broader mental health consequences was limited among young adults.
- Participants described **underage sports betting as common**, occurring through both informal **peer networks** and **regulatory loopholes**.
- Young adult support professionals reported feeling **underprepared** to address sports betting harms, citing **insufficient training, resources, and support services**.
- Participants emphasized the importance of harm reduction approaches.

NORC Recommendations

1. **Strengthen Statewide Education and Public Awareness on Gambling Harms**
2. **Regulate Sports Betting Advertising and Promotions**
3. **Strengthen App-Based Safeguards Using Opt-Out Defaults**
4. **Expand Access to and Awareness of Gambling-Specific Support Services**
5. **Address Underage Betting and Regulatory Loopholes**
6. **Adopt Harm Reduction Approaches for Collegiate Athletes**
7. **Invest in Ongoing Research, Monitoring, and Evaluation**



This study offers several strengths that enhance the credibility and relevance of the findings; however, we also acknowledge limitations

Strengths:

- In-depth understanding of young adult experiences
- Multiple stakeholder perspectives
- Fills a critical research gap
- Community-engaged design

Limitations:

- Findings may not generalize beyond Massachusetts
- Sports betting policies and practices continue to evolve
- Results are based on self-reported experiences

Acknowledgments

Project Team

NORC

- Petry Ubri, MSPH
- Jared Sawyer, MPH
- Katie Gallant, MSW
- Maya Ng-Yu

Previously at NORC

- Jenna Sirkin, PhD,
- Christina Drymon, PhD
- Alva Chavez
- Samantha Augenbraun, MPH

Gemini Research Group

- Rachel Volberg, PhD
- Calyx Terrafen

Community Advisory Board Members

- Anna DiGravio
- Anthony Sardak
- Benjamin Starr
- Daniel Echeverria Cordoba (also served as interviewer)
- Erica McCummings
- Frank Poon
- Hugo Rengifo
- Jacob Wallack
- Josh Garber
- Linh Ho
- Matthew Jodoin-Siegel
- Stephanie Cadet
- Veronica Monserratt
- Yanqing Huang (also served as interviewer)
- Zachariya Ibrahim

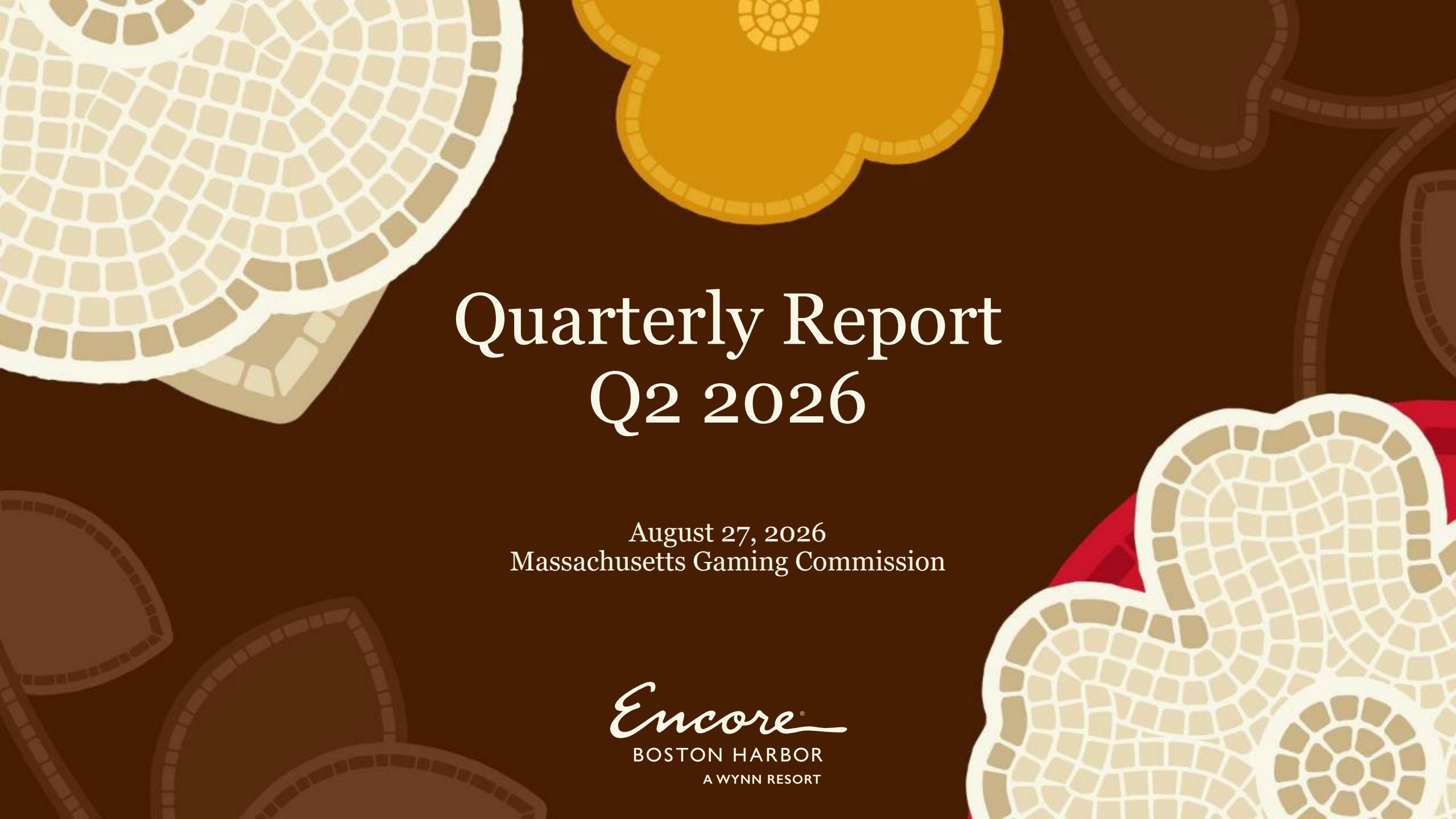
Questions?

Thank you.

Petry Ubri
Project Director
Ubri-petry@norc.org

 Research You Can Trust™

 **NORC** at the
University of
Chicago



Quarterly Report Q2 2026

August 27, 2026
Massachusetts Gaming Commission

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Gaming Revenue, Taxes & Lottery Sales

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Gaming Revenue & Taxes: Q2 2026

Month	Table Games GGR	Slots GGR	Total GGR	State Taxes Collected
April	\$21,872,617.93	\$38,140,443.20	\$60,013,061.13	\$15,003,265.28
May	\$24,175,171.67	\$38,885,068.18	\$63,060,239.85	\$15,765,059.96
June	\$22,754,760.82	\$34,357,748.87	\$57,112,509.69	\$14,278,127.42
Total	\$68,802,550.42	\$111,383,260.25	\$180,185,810.67	\$45,046,452.66

Gaming Revenue & Taxes: Year-Over-Year

Year	Quarter	Table Games GGR	Slots GGR	Total GGR	State Taxes Collected
2025	Q1	\$77,646,987.06	\$106,086,032.96	\$183,733,020.02	\$45,933,255.01
	Q2	\$76,765,038.95	\$110,256,987.21	\$187,022,026.16	\$46,755,506.54
	Q3	\$72,661,542.20	\$111,649,122.65	\$184,310,664.85	\$46,077,666.22
	Q4	\$67,298,005.92	\$111,797,717.38	\$179,095,723.30	\$44,773,930.83
	Total	\$294,371,574.13	\$439,789,860.20	\$734,161,434.53	\$183,540,358.60
2026	Q1	\$69,822,337.87	\$110,455,046.86	\$180,277,384.73	\$45,069,346.19
	Q2	\$68,802,550.42	\$111,383,260.25	\$180,185,810.67	\$45,046,452.66
	Q3				
	Q4				
	Total (to date)	\$138,624,888.29	\$221,838,307.11	\$360,371,621.34	\$90,115,798.85

Sports Wagering Revenue & Taxes: Q2 2026

Month	Monthly Win	State Retail Taxes Collected
April	\$356,650	\$52,097
May	\$228,091	\$32,839
June	\$328,507	\$48,060
Total	\$913,248	\$132,996

Lottery Sales: Q2 2026*

Month	Lottery Sales	% Change from 2025
April	\$362,971.00	18.0%
May	\$411,174.50	28.8%
June	\$314,057.00	26.3%
Total	\$1,088,202.50	24.3%

*The periods for which relevant sales are reported are based upon week-end totals, and may not correspond precisely to calendar month periods.

Workforce

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Workforce Composition

Sector	Goal	Q1 % ¹	Q1 Total # of Employees	Q2 % ²	Q2 Total # of Employees	Q3 %	Q3 Total # of Employees	Q4 %	Q4 Total # of Employees
Minority	40%	75%	2,156	75%	2,115				
Veteran	3%	2%	68	2%	69				
Women	50%	45%	1,521	45%	1,501				
Local/Host/Surrounding Community Resident ³	75%	87%	2,960	89%	2,968				
MA Residents	-	92%	3,126	93%	3,079				
Total Number of Employees ⁴			3,387			3,321			
Full-time			2,367			2,298			
Part-time			1,020			1,023			
On-call			0			0			

¹ All Q1 figures are as of April 1, 2026. The total number of employees that did not specify their minority status during Q1 was 517.

² All Q2 figures are as of July 1, 2026. The total number of employees that did not specify their minority status during Q2 was 501.

³ Local/Host/Surrounding Community Residents” include residents from communities within thirty (30) miles of Encore Boston Harbor.

⁴ Please note that an employee may fall into more than one sector (e.g.: minority and local) and, as such, totals may not be reflective of the sum of previous columns.

Workforce Composition: Employees Supervisory & Above

	Minority	Women	Veteran	Total Head Count (including non-minority employees)
ALL EMPLOYEES				
Number of Employees	2,115	1,501	69	3,321
% Actual	75%	45%	2%	
MANAGER AND ABOVE				
Number of Employees	77	77	9	193
% Actual	42%	40%	5%	
SUPERVISORS AND ABOVE				
Number of Employees	290	221	16	538
% Actual	59%	41%	3%	

Operating Spend

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Operating Spend¹: Diversity

Diversity Category	Annual Goal	Q1 %	Q1 Spend	Q2 %	Q2 Spend	Q3 %	Q3 Spend	Q4 %	Q4 Spend
MBE Vendor Spend	8%	6%	\$1,264,882.77	4%	\$841,900.01	-	-	-	-
VBE Vendor Spend	3%	0%	\$20,389.46	0%	\$60,557.49	-	-	-	-
WBE Vendor Spend	14%	12%	\$2,477,114.74	17%	\$3,394,178.01	-	-	-	-
Total Diverse Spend	25%	18%	\$3,762,386.97	21%	\$4,296,635.51	-	-	-	-

¹ All spend figures referenced herein are based upon Encore Boston Harbor's Q2 discretionary spend amount of **\$20,346,330.04**.

Operating Spend: Local

Local Vendor Spend	Goal	Q1 %	Q1 \$	Q2 %	Q2 \$	Q3 %	Q3 \$	Q4 %	Q4 \$
Boston	\$20,000,000.00	11%	\$2,126,759.94	13%	\$2,570,894.44	-	-	-	-
Chelsea	\$2,500,000.00	2%	\$327,250.13	2%	\$330,469.67	-	-	-	-
Everett	\$10,000,000.00	7%	\$1,454,327.00	2%	\$478,094.92	-	-	-	-
Malden	\$10,000,000.00	1%	\$108,208.76	1%	\$106,304.16	-	-	-	-
Medford	\$10,000,000.00	1%	\$187,204.83	1%	\$243,112.17	-	-	-	-
Somerville	\$10,000,000.00	5%	\$953,666.99	4%	\$815,652.00	-	-	-	-
MA Vendor Spend	N/A	58%	\$11,731,427.24	56%	\$11,352,123.71	-	-	-	-

Compliance

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Compliance: Minors¹ Prevented from Gaming²

Month	Minors Intercepted on Gaming Floor and Prevented from Gaming	Minors Intercepted Gaming	Minors Intercepted at Slot Machines	Minors Intercepted at Table Games	Minors Intercepted Consuming Alcohol	Number of IDs NOT Checked that Resulted in Minor on Gaming Floor	Number of Fake IDs Provided by Minors that Resulted in Minor on Gaming Floor	Numbers of Minors on Gaming Floor Under 18 Years of Age
April	3	1	0	1	0	0	1	1
May	2	0	0	0	0	0	1	4
June	0	0	0	0	0	0	0	0
Total	5	1	0	1	0	0	2	0

1 A “minor” is defined as a person under 21 years of age, provided however, that the last column of the above specifically refers to persons under 18 years of age.

2 Please note that no minors were intercepted or found to be engaged in any sports wagering during Q2.

- The average length of time spent by a minor on the casino floor was 41 minutes 52 seconds.
- The longest length of time spent by a minor on the casino floor was 6 hours 45 minutes.
- The shortest length of time spent by a minor on the casino floor was 1 minute 38 seconds.

People & Culture Initiatives

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Annual Employee Engagement Survey

- The survey ran May 6–14.
- Employees who participated during kick-off events were entered into a prize raffle.
- Employees could take the survey on their phones, or on iPads in various areas throughout the building.



7-Year Anniversary Celebration



On Tuesday, June 23, Encore Boston Harbor celebrated our 7-year anniversary with a special ice coffee bar.

Cool down with *care*

**SIPPING INTO SUMMER
WITH GRATITUDE**

Tuesday, June 23

6–8 a.m. | 11 a.m.–1 p.m. | 3–5 p.m.
6–8 p.m. | 9–11 p.m.

Stop by the back of house outside of Le Staff Cafe and enjoy a custom-crafted **cold brew coffee** to beat the heat, topped with **sweet cream cold foam** and your choice of **caramel** or **mocha syrup**.



CLIMB Leadership Development Program

As part of Encore's ongoing leadership development strategy, the second annual **CLIMB Program** continued with sessions held on:

- June 1 – for Revenue Management at Boston University with Professor Jung
- June 16 – for Public Speaking & Persuasion with Director of Learning & Culture Taylor Medeiros
- June 30 – featuring Executives from Hotel, Brand Marketing, and People & Culture.



Summer Soiree Events

Throughout June



Promotions, Marketing, Special Events & Volunteerism

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Community Relations Q2 Highlights

Volunteer Hours

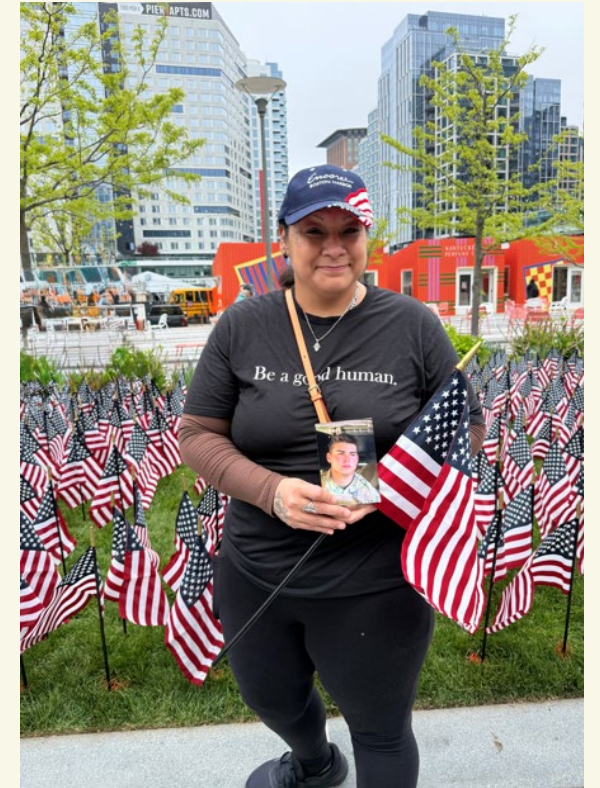
1,187 volunteer hours completed by employees of Encore Boston Harbor

Volunteer Events

14 volunteer events were held, including Flags for the Fallen with Mass Fallen Heroes, food sorting at Food Link, and Giving Factory at Cradles to Crayons

Mother's Day Bake Sale

\$2,784 was raised for the WRF Community Grant Fund from the Mother's Day Bake Sale



TRU Contributions: Q2 2026

Charitable Organization	Dollar Amount	Number of Tickets
Everett Citizens Foundation	\$8,473.90	66,475
Massachusetts Fallen Heroes	\$27,682.67	115,926
MSPCA-Angell	\$26,337.02	112,129
Wynn Resorts Foundation	\$9,547.44	69,161
Total	\$72,041.03	363,691



Questions?



PLAINRIDGE PARK

Q2 2026 REPORT



RETAIL SPORTS WAGERING REVENUE AND TAXES

Year	Quarter	Net Sports Wagering Revenue	Sports Wagering Taxes
2025	Q1	\$575,358	\$86,304
	Q2	\$641,653	\$96,248
	Q3	\$705,081	\$105,762
	Q4	\$1,219,470	\$182,921
	Total	\$3,141,561	\$471,234
2026	Q1	\$944,923	\$141,738
	Q2	\$896,282	\$131,978
	Q3		
	Q4		
	Total		

In addition to the Retail Sportsbook, Plainridge Park has 20 sports wagering kiosks.



GAMING REVENUE AND TAXES

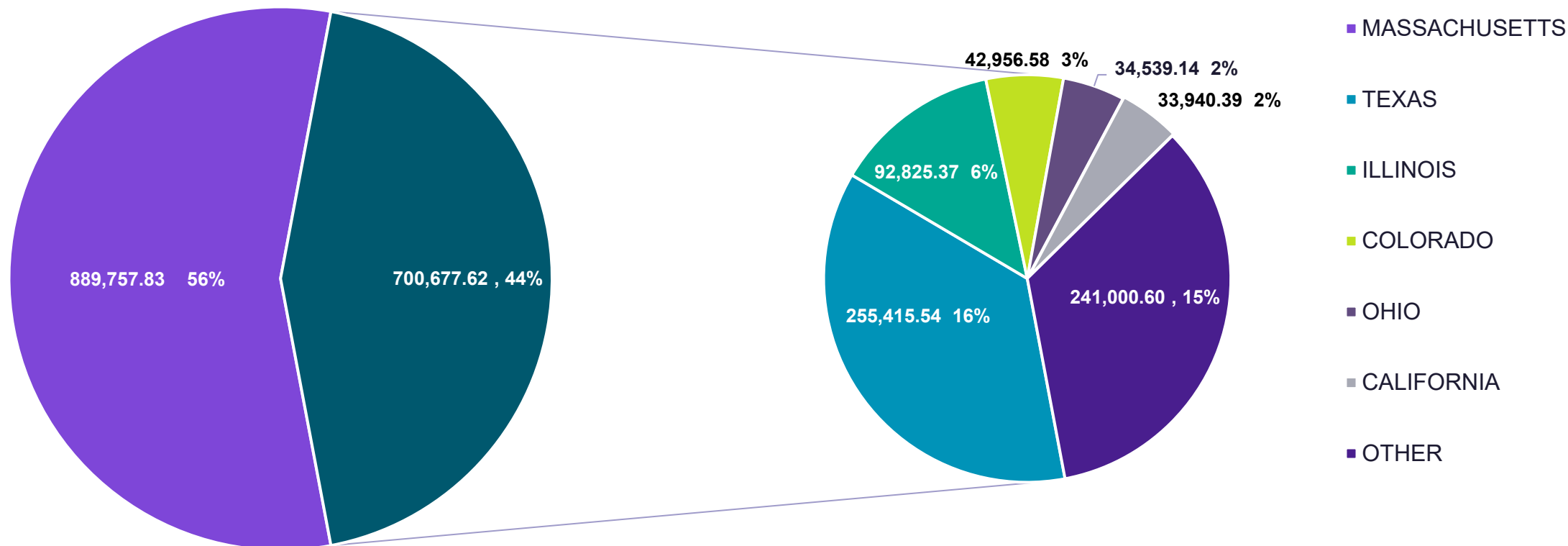
Year	Quarter	Net Slot Revenue	State Taxes	Race Horse Taxes	Total Taxes
2025	Q1	\$43,494,439	\$17,397,776	\$3,914,500	\$21,312,275
	Q2	\$46,342,475	\$18,536,990	\$4,170,823	\$22,707,813
	Q3	\$44,716,034	\$17,886,414	\$4,024,443	\$21,910,857
	Q4	\$43,807,743	\$17,523,097	\$3,942,697	\$21,465,794
	Total	\$178,360,691	\$71,344,277	\$16,052,462	\$87,396,739
2026	Q1	\$43,953,405	\$17,581,362	\$3,955,806	\$21,537,168
	Q2	\$46,689,092	\$18,675,637	\$4,202,018	\$22,877,655
	Q3				
	Q4				
	Total				

LOTTERY SALES

Quarter	2026	2025	\$ Difference	% Difference
Q1	\$678,106	\$644,925	\$33,181	5.14%
Q2	\$710,754	\$615,801	\$94,953	15.42%
Q3		\$666,543		
Q4		\$661,504		
Total		\$2,588,773		

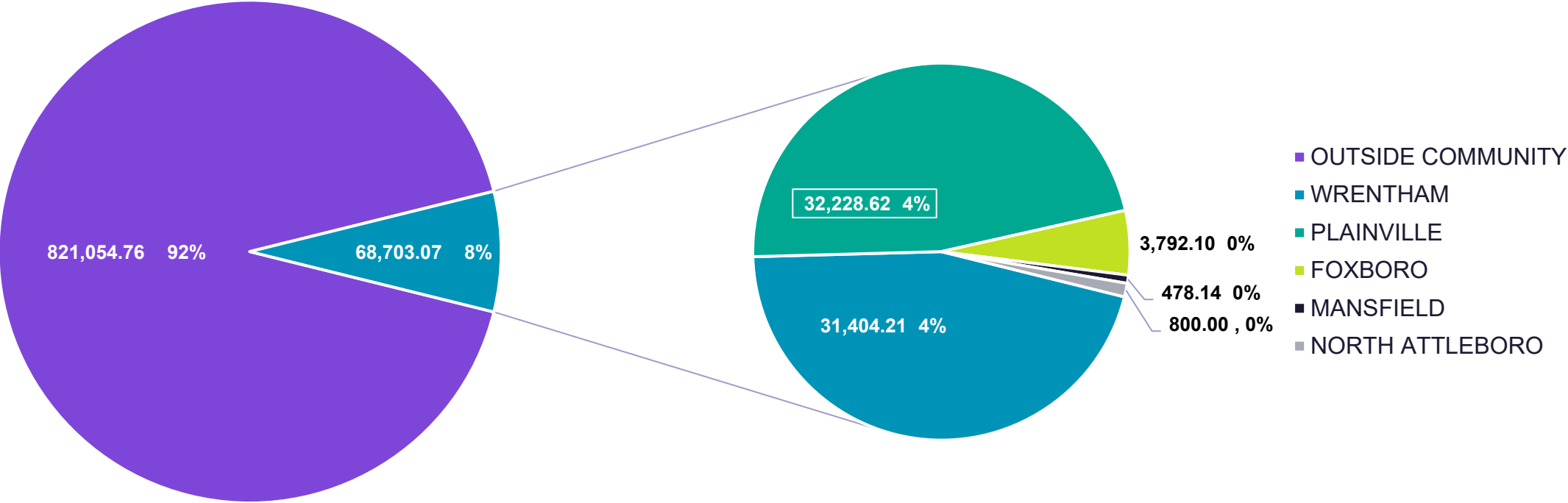
SPEND BY STATE

Q2 2026 Total Qualified Spend By State



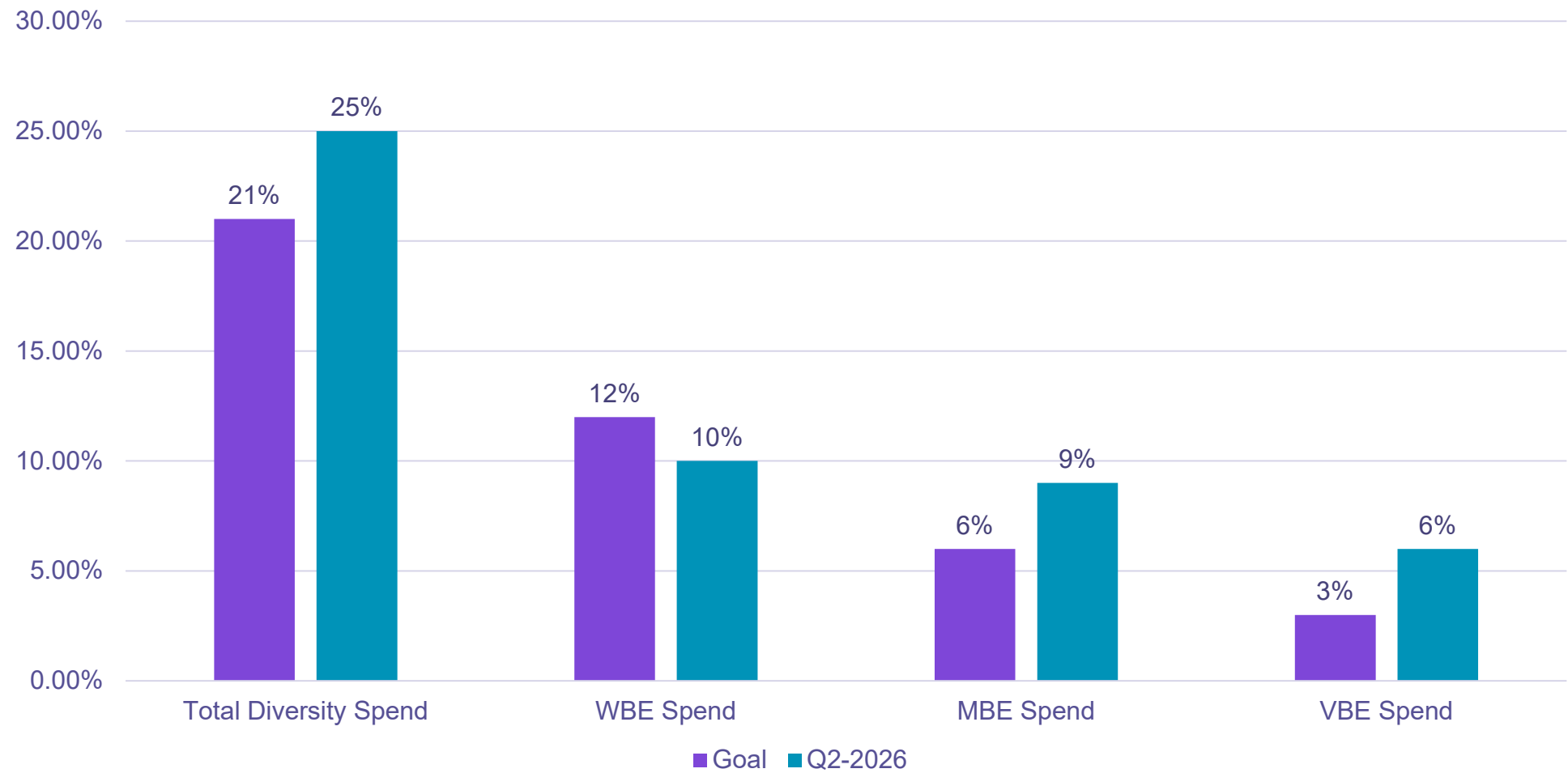
LOCAL SPEND

Q2 2026 Massachusetts vs Host & Surrounding Community Qualified Spend



VENDOR DIVERSITY

Q2 2026 vs Goal



DIVERSE SPEND

Category ¹	Q2 2026	Q1 2026	\$ Difference	% Difference
WBE	\$155,395	\$177,158	-\$21,763	-14%
MBE	\$150,922	\$70,363	\$80,559	47%
VBE	\$92,055	\$82,443	\$9,612	11%
Total Diverse Spend	\$398,372	\$329,965	\$68,407	19%
Qualified Spend	\$1,590,435	\$1,196,780	\$393,655	33%

¹ Includes vendors that are certified in multiple diversity categories. Spend is reported in all qualified categories.

COMPLIANCE

Month	Prevented from Entering Gaming Establishment			Expired, Invalid, No ID	Fake ID	Weapons Detected	Minors & Underage Escorted from the Gaming Area	Minors & Underage found Gaming at Slot Machines	Minors & Underage Escorted from the Sports Wagering	Minors & Underage found Sports Wagering	Minors & Underage Consuming Alcoholic Beverages
	Total	Minors ¹	Underage ²								
April	30	3	6	17	0	4	0	0	0	0	0
May	49	2	22	20	0	5	0	0	0	0	0
June	45	6	21	15	0	3	0	0	0	0	0
Total	124	11	49	52	0	12	0	0	0	0	0

¹ Person under 18 years of age

² Person 18-21 years of age



EMPLOYMENT¹: ALL EMPLOYEES²

Employee Category	Percentage Goal	Total # of Employees in Category	Q2-26 Actual Percentage of Total Employees	Q1-26 Actual Percentage of Total Employees
Diversity	15%	162	33%	33%
Veterans	2%	16	3%	3%
Women	50%	227	46%	46%
Local ³	35%	136	28%	28%
MA Employees	N/A	277	57%	56%

¹ All employees referenced in this slide were current as of Q2 2026

² Total number of employees Q2 2026: 489

³ Local includes Attleboro, Foxboro, Mansfield, North Attleboro, Plainville & Wrentham

	Employees	Full-Time	Part-Time	Seasonal
Total	489	302	187	0
% of Total	100%	62%	38%	0

EMPLOYMENT¹: SPORTSBOOK²

Employee Category	Total # of Employees in Category	Actual Percentage of Total Employees
Diversity	1	7%
Veterans	0	0%
Women	5	33%
Local ³	5	33%
Full-Time	9	60%

¹ All employees referenced in this slide were current as of Q2 2026

² Total number of **Sportsbook employees (does not include Sports restaurant employees)** Q2 2026: 15

³ Local includes Attleboro, Foxboro, Mansfield, North Attleboro, Plainville & Wrentham

EMPLOYMENT¹: SUPERVISOR AND ABOVE²

Employee Category	Total # of Employees in Category	Actual Percentage of Total Employees
Diversity	17	20%
Veterans	5	6%
Women	28	33%

¹ All employees referenced in this slide were current as of Q2 2026

² Total number of Supervisor and Above Q2 2026: 86



PPC CARES

OUR DEVELOPMENT - Q2, 2026



CREATING OUTSTANDING LEADERS

To invest in the professional and personal development of TEAM MEMBERS by providing exposure to diverse perspectives and experiences, fostering growth and purpose-driven leadership, and promoting self-esteem and confidence in our team members.

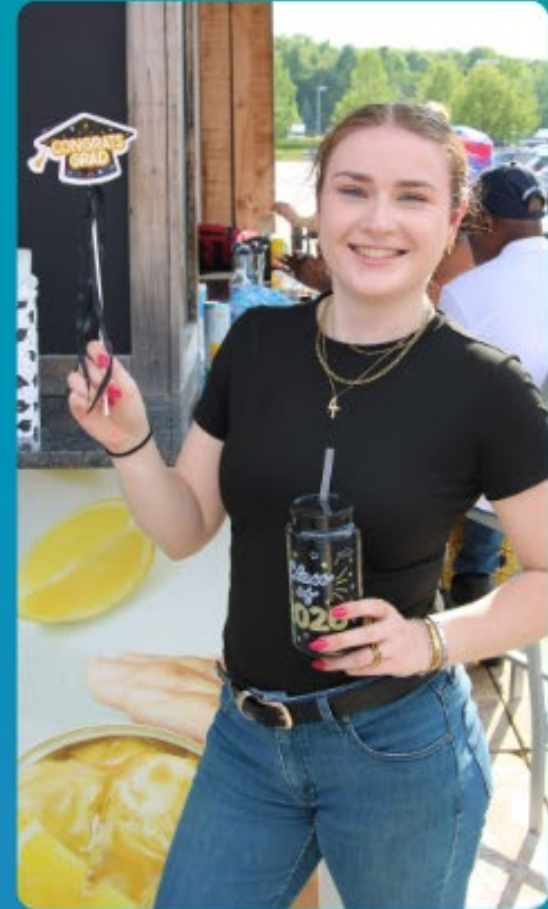
CONGRADULATIONS ELP CLASS OF 2026!



PPC: EMERGING LEADERS PROGRAM GRADUATION



PPC: MARC GUSTELLA WELCOME



PPC: TEAM MEMBER GRADUATION



ACES OF PENN: TEAM MEMBERS OF THE QUARTER



PPC: FAMILY BBQ



PPC CARES

OUR TEAM - Q2 2026



ENGAGED TEAM MEMBERS

To provide training, work environments, events, activities for TEAM MEMBERS to stay motivated, creative, and work well together to achieve shared goals. Our leaders should inspire team members that are eager to learn and grow, and feel valued for their feedback.

Mother's Day Memory Album May 10



PPC: MOTHERS DAY



PPC: DIVERSITY MONTH LUNCH



PPC: PRIDE MONTH

Happy Father's Day!

Thank You for Your Photo Submission!



PPC: FATHERS DAY



PPC: FLAG DAY



PPC CARES

OUR COMMUNITY - Q2 2026



PARTNERING SUCCESS

Working collaboratively with our community partners and TEAM MEMBERS to help mobilize resources and influence systems. Our team members will dedicate resources such as time, funding, and people with the necessary skills to enhance the mission of our community partners.



MASSARTS PERFORMING ARTS - RENT



RACING OPENEING DAY



HABITAT FOR HUMANITY BUILD



KENTUCKY DERBY DAY



PFD SUPPORTING ROLLING THUNDER



ROLLING THUNDER



COMMONWEALTH COMMITMENT TO MILITARY



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

FROM: Tom Lam – Compliance and Operations Manager, Sports Wagering Division

MEMO: 08/12/2026

MEETING: 08/27/2026

RE: Request for an Extension of Temporary Waiver from Amended 205 CMR 247.07
and 205 CMR 248.10 – Related to Debit Access Instruments

EXECUTIVE SUMMARY:

The following Category 3 Sports Wagering Operators, Fanatics, is seeking Commission approval for an extension to their previously approved temporary waiver from the Commission's recent amendments to 205 CMR 247.07 and 205 CMR 248.10 related to debit access instruments.

As of May 7, 2026, Fanatics, in addition to BetMGM, Caesars, DraftKings and FanDuel, were approved a temporary waiver to permit them the additional time needed to implement the necessary technological changes to ensure that deposits made using prohibited funding methods in other jurisdictions are properly segregated from Massachusetts accounts consistent with prior guidance and established practices of the Commission.

Fanatics seeks an extension of two (2) months to have this technological change developed, thoroughly tested and fully implemented.

REGULATION BACKGROUND:

Pursuant to 205 CMR 247.07(5)(d) and 205 CMR 248.10(2)(d), sports wagering may be funded by "[d]ebit instruments, including debit cards and prepaid access instruments, *excluding those that can be purchased or loaded with a credit card* [emphasis added]."

DISCUSSION:



On April 9, 2026, the Commission approved amendments to 205 CMR 247.07 and 205 CMR 248.10 to close a loophole involving the indirect use of credit cards for sports wagering. The amendments clarified that debit access instruments that can be purchased or loaded with a credit card, such as Visa and MasterCard gift cards, are not permissible.

These changes took effect on April 24, 2026. All operators have since removed funding methods involving prepaid access instruments that can be purchased or loaded with credit cards, including Visa and MasterCard gift cards.

Consistent with prior Commission practice, deposits made using these prohibited methods in other jurisdictions must be segregated from Massachusetts wallets. However, operators have indicated that implementing this segregation requires significant technical and product development, necessitating additional time to comply with the amended regulations.

On May 7, 2026, the Commission approved of temporary waivers to BetMGM, Caesars, DraftKings, FanDuel and Fanatics to have this system update be implemented and completed by September 1, 2026.

Originally, Fanatics requested a six (6) month waiver to complete the system updates necessary to satisfy the segregation requirement. The Commission granted Fanatics a waiver through September 1, 2026, or four (4) months. Fanatics is now requesting an additional two (2) months to complete the anticipated system updates.

CONCLUDING STATEMENT:

The SWD recommends that the Commission approve Fanatics' request to extend the temporary waiver of the requirements set forth in 205 CMR 247.07 and 205 CMR 248.10 through November 1, 2026, which is two (2) months from the September 1, 2026, deadline directed by the Commission.



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

FROM: Brittany Costello, Compliance Officer II, Sports Wagering

MEETING: 8/27/26

RE: Update to BetMGM, LLC and MGM-Springfield's Sportsbook House Rules

REGULATION BACKGROUND:

Pursuant to [205 CMR 247.02\(4\)](#), a Sports Wagering Operator shall not change or modify the House Rules without prior written approval of the Commission.

EXECUTIVE SUMMARY:

BetMGM, LLC, as a Category 3 Sports Wagering Operator, and as the vendor for the Category 1 retail sportsbook at MGM-Springfield, has requested changes to their Massachusetts online and retail sportsbook house rules. A full detailed summary of changes can be found in the attached redline exhibits.

The summary of changes which impact both the BetMGM online sportsbook and the retail sportsbook at MGM-S are as follows:

1. **Softball:** clarifies when wagers will stand or void in the event of a game being suspended after the start of play (such as for bad weather), clarifies Home/Away designation for collegiate games at neutral venues.

The summary of changes which impact only BetMGM'S Online Sportsbook are as follows:

1. **eSports:** Added eSports house rules governing match abandonment, date/venue changes, cancelled matches, and applicability of overtime to certain markets. Clarifies that wagers are settled based on results determined by official governing body.
2. **Ice Hockey:** clarifies Same-Game Parlay rules for bets with voided legs



Sports Wagering Division

CONCLUDING STATEMENT:

The Sports Wagering Division confirms all requirements have been met under 205 CMR 247.02 and recommends approving these changes.

**MGM Springfield
Sports Book House Rules**

Minimum Length of Play

If a game has been suspended after the game has started, due to a weather delay or other deferral, and resumes within 36 hours after the original start time, all wagers will stand. If a suspended game resumes more than 36 hours after the original start time and the requirements for Minimum Length of Play have not been satisfied, all wagers will be cancelled except for those that have been unconditionally determined prior to the game's suspension. If a scheduled match does not begin and is not rescheduled within 36 hours after the original start time, all bets are cancelled.

Softball Post Season Rule

In the event a playoff or postseason tournament game is suspended after the game has started, all bets will stand through any case of suspension until the game is officially completed as per the relevant governing body. In the event of a date change prior to the event starting, all wagers will be cancelled.

College Softball Neutral Venue Rule

For College Softball, neutral venue games are settled based on the official game result, regardless of the home/away designation displayed for each team on the site. The team order on the site (e.g., home/away or top/bottom listing) is for display purposes only and does not determine the home team status.

Esports Rules

Match overall winner

Wager on the overall winner of a specified match prior to the match starting. This may be offered on a specific team or individual (during individual competitions). BetMGM will recognize the team that is deemed the winner of the match by the governing body of the league/competition or event organizer. This wager will be offered pre-match and may also be offered at adjusted prices/odds in between rounds (maps) of the competition.

Date/Site Changes

Any bets on a game not played on the scheduled date or played at a different venue, at the time the bet was placed, will be declared cancelled.

Esports Wagers

Futures/Outrights

Unless stated otherwise, all bets will stand regardless of postponements unless the official sporting governing body declares that the tournament/competition has been canceled with no official winner, in which case bets will be cancelled.

E-Basketball

Settlement will be based on the official result as declared by the relevant governing body of the specified competition, broadcast, or game API. Should a match be abandoned, all markets will be cancelled unless the outcome has been unconditionally determined.

All game markets include overtime, unless specified below:

Quarter Markets

Result of score for relevant quarter. Overtime does not count for this market.

Second Half Markets

Result of score for second half. Overtime does count for this market.

E-Football

All match markets are settled based on the official score at the end of regulation time, unless otherwise stated. This includes any added injury or stoppage time, but does not include extra-time, time allocated for a penalty shootout, or golden goal.

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Hockey Rules

Hockey Same Game Parlay Rules

Hockey Same Game Parlay rules are the same as Hockey rules stated above, with the following exceptions:

Bet Settlement (For Same Game Parlay):

If a NHL Hockey selection within a SGP is cancelled, then the wager odds at the time of bet placement will be re-calculated using the remaining legs. This only applies to selections placed on NHL.

For SGP selections on all other Hockey leagues, if any leg in a SGP is void or cancelled, then the entire SGP is void. If all other SGP or Single wagers within a SGP+ are winners, the SGP+ will be paid out at a re-calculated price using the remaining legs.

If one or more selections in any bet are resulted as cancelled for any reason (such as a selected player not participating in the match), the entire bet will be resulted as cancelled. For instance, selections on a team to win a match where it is a draw after overtime (or normal time if no overtime is to be played), even where the draw or tie may not have been offered through Same Game Parlay, will be settled as losers. This will not be relevant to NHL matches as a winner will be decided either in overtime or shootouts but may be applicable to other hockey leagues or competitions as per their individual competition rules.

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Softball Rules

Date/Site Changes

If a game has been suspended after the game has started, due to a weather delay or other deferral, and resumes within 36 hours after the original start time, all wagers will stand. If a suspended game resumes more than 36 hours after the original start time, and the requirements for Minimum Length of Play have not been satisfied, all wagers will be cancelled except for those that have been unconditionally determined prior to the game's suspension. If a scheduled match does not begin and is not rescheduled within 36 hours after the original start time, all bets are cancelled. If a match is not played on the scheduled date and at the listed venue, then all bets are cancelled.

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Softball Post Season Rule

In the event a playoff or postseason tournament game is suspended after the game has started, all bets will stand through any case of suspension until the game is officially completed as per the relevant governing body. In the event of a date change prior to the event starting, all wagers will be cancelled.

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College Softball Neutral Venue Rule

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

FROM: David Harrison – Compliance Officer II, Sports Wagering

MEETING: 8/27/2026

RE: Update to Fanatics Betting & Gaming House Rules

REGULATION BACKGROUND:

Pursuant to [205 CMR 247.02\(4\)](#), a Sports Wagering Operator shall not change or modify the House Rules without prior written approval of the Commission.

SUMMARY:

Fanatics Betting & Gaming (“FBG”) has requested a single change to their Massachusetts online sportsbook house rules. The change is outlined below for their Baseball section.

Baseball Player Market Rules

General Player Prop Rules

For pre-event player related markets, pitchers must start and throw at least one pitch for bets to have action. Hitters must start and record at least one plate appearance for bets to have action.

~~For in-play player related markets, pitchers must throw at least one pitch after the time of bet placement for bets to have action. Hitters must record at least one plate appearance after the time of bet placement for bets to have action.~~



Division of Licensing

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

FROM: Richard Lawless, Licensing Division Interim Chief

CC: Caitlin Monahan, IEB Director

DATE: August 27, 2026

RE: Plainridge Park Casino's Application for Amendment of Gaming Beverage License

Overview: Plainridge Park Casino (PPC) has applied for an amendment of its gaming beverage license to modify the beverage service hours for all existing licensed beverage areas, specifically: Casino Gaming Floor, Revolution 1776 Lounge, The Sportsbook, Slack's Oyster House and Grill, Food Court (Wahlburgers and Slice), 1st Floor Racing Building (Dark Horse and Trackside Concession), Mountain Skipper Express (Racing Building 2nd Floor West Side), The Loft Banquet Event Space, Racing Apron Outside Bar, and High Limit Lounge. The amendment requests to extend the beverage service hours to 2 a.m. for the aforementioned licensed beverage areas. The floorplan and licensed beverage areas of the casino will remain otherwise unchanged.

Standard: Under G.L. c. 23K, § 26, and 205 CMR 136.03 and 136.04, the Commission is authorized to amend the license for the sale and distribution of alcoholic beverages to be drunk on the premises of the gaming establishment.

Pursuant to 205 CMR 136.03(3), the Division of Licensing "shall review the application to determine whether it contains all of the elements required in accordance with 205 CMR 136.04."

Accordingly, "[i]f the Division of Licensing is satisfied that the application meets the requirements of 205 CMR 136.04 and M.G.L. c. 23K, § 26, and that any modifications requested in accordance with 205 CMR 136.03(2) have been satisfactorily addressed, it shall forward the application to the [C]ommission with a recommendation that it be approved."

Discussion: The Division of Licensing has reviewed the amendment application and has determined that it is complete and in conformance with all regulatory requirements. It is the opinion of the Division that there is sufficient information regarding the description of the storage and service of the beverages¹.

RECOMMENDATION OF THE LICENSING DIVISION

¹ The licensed area application must contain "a description of the licensed area including the ... number and location of alcoholic beverage dispensing areas." 205 CMR 136.04(2)(b).



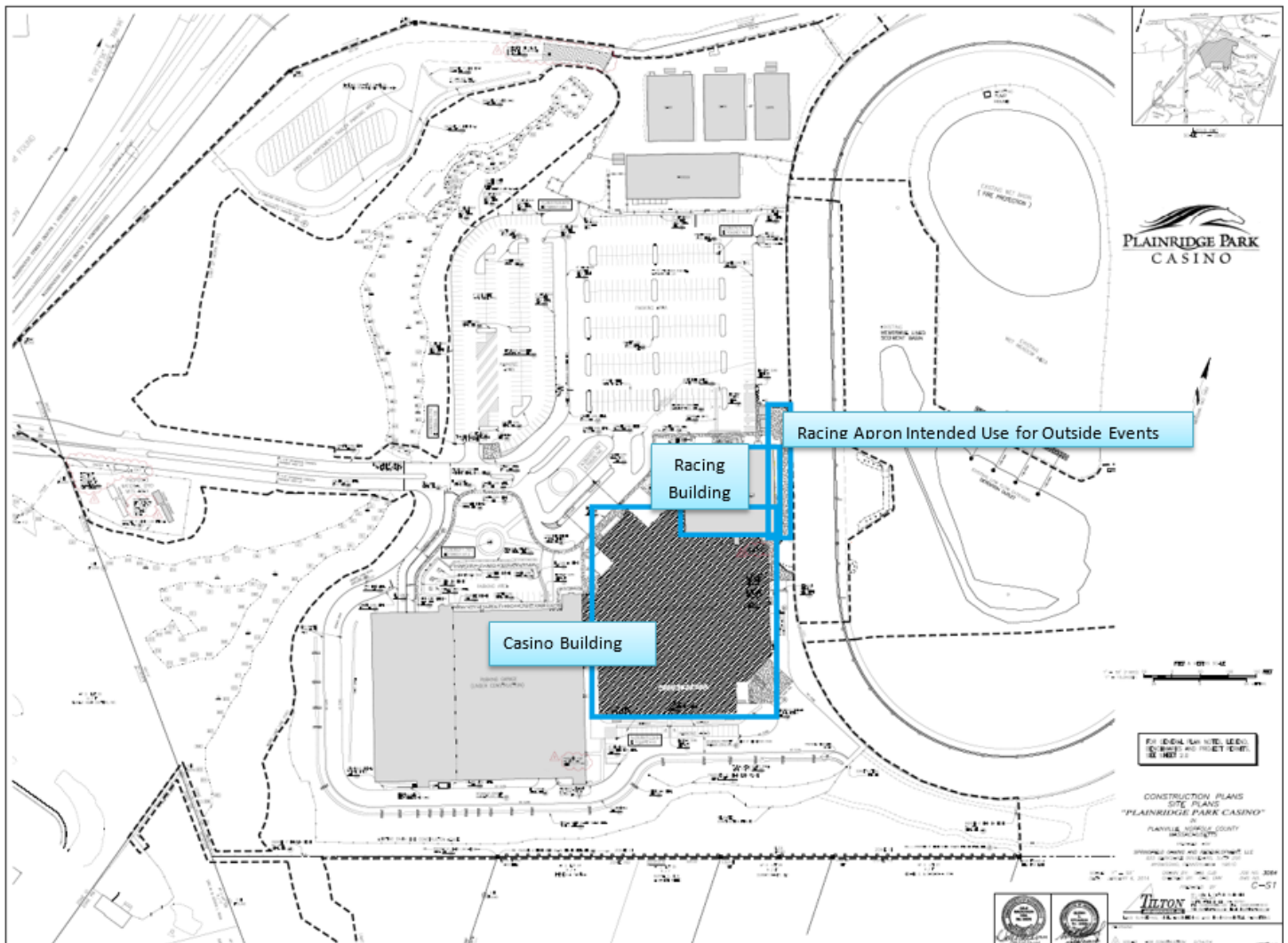
Division of Licensing

After reviewing the amendment application, the Licensing Division recommends that the Commission approve Plainridge Park Casino's application to amend its gaming beverage license to extend the hours of beverage service for all ten licensed beverage areas to 2 a.m.

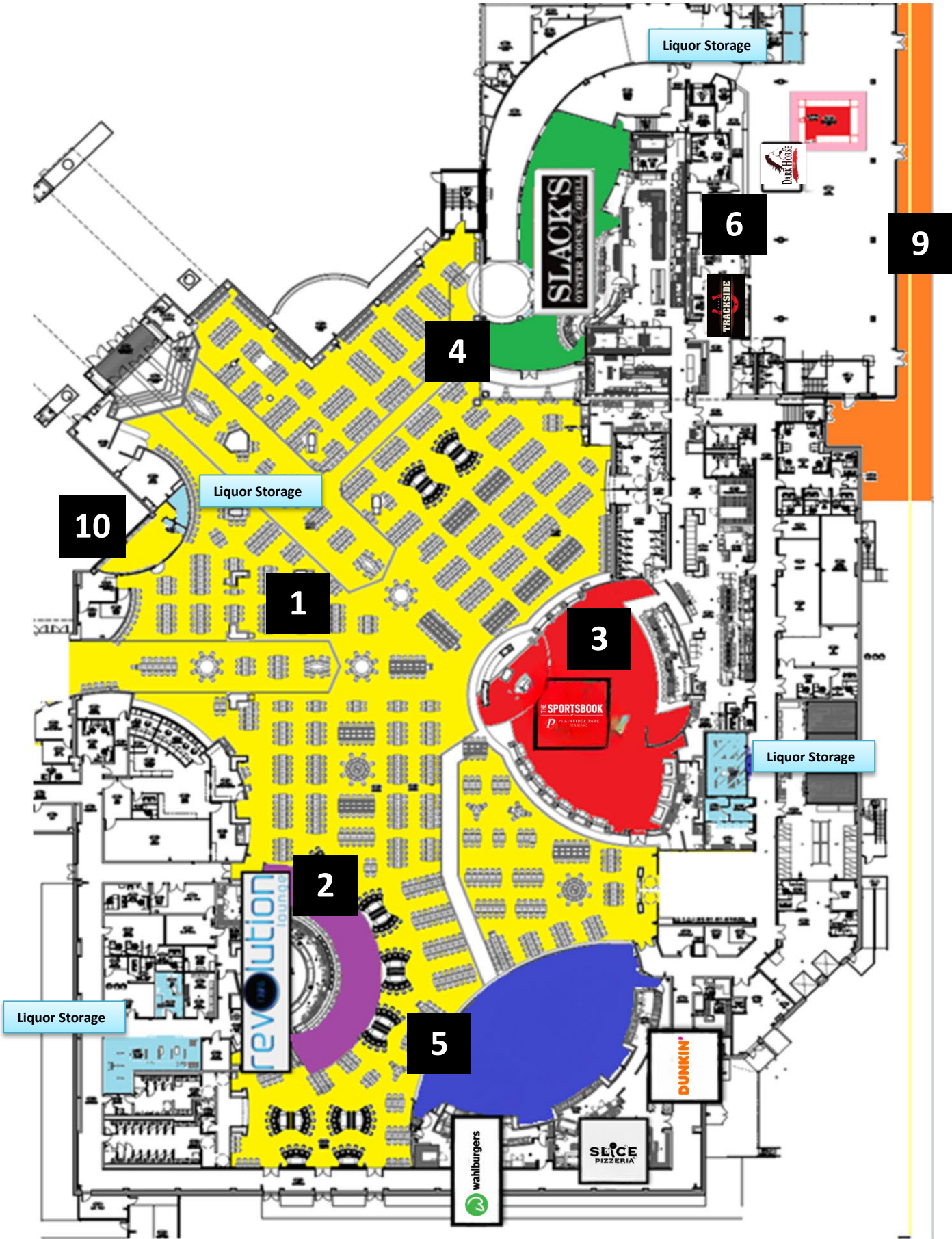
Gaming Beverage License Information

	Casino	Seats		Portable	Sq Feet
1	Casino Gaming Floor	1500		2	43,800
Loc.	Restaurants and Lounge	Seats	Tables	Bars	Sq Feet
2	Revolution 1776 Lounge	88	23	1	2,351 sq ft
3	The Sportsbook @ Plainridge	146	48	1	6,088 sq ft
4	Slack's Oyster House and Grill	125	32	1	3,407 sq ft
10	High Limit/VIP Lounge	18	0	0	590 sq ft
	Food Court	Seats	Tables		Sq Feet
5	Wahlburgers	115	33		4,377 sq ft
5	Slice				
	Racing Area Venues	Seats	Tables		Sq Feet
7	Mountain Skipper Express (2 nd Floor)	0	0	1	5,264 sq ft
6	1 st Floor Racing (Dark Horse Bar & Trackside)	383	105	1	7,400 sq ft
9	Racing Apron/Outside Bar			1	8,000 sq ft
	Banquet Room	Seats	Tables	Portable	Sq Feet
8	The Loft (2 nd Floor)	400	40	2	7,534 sq ft

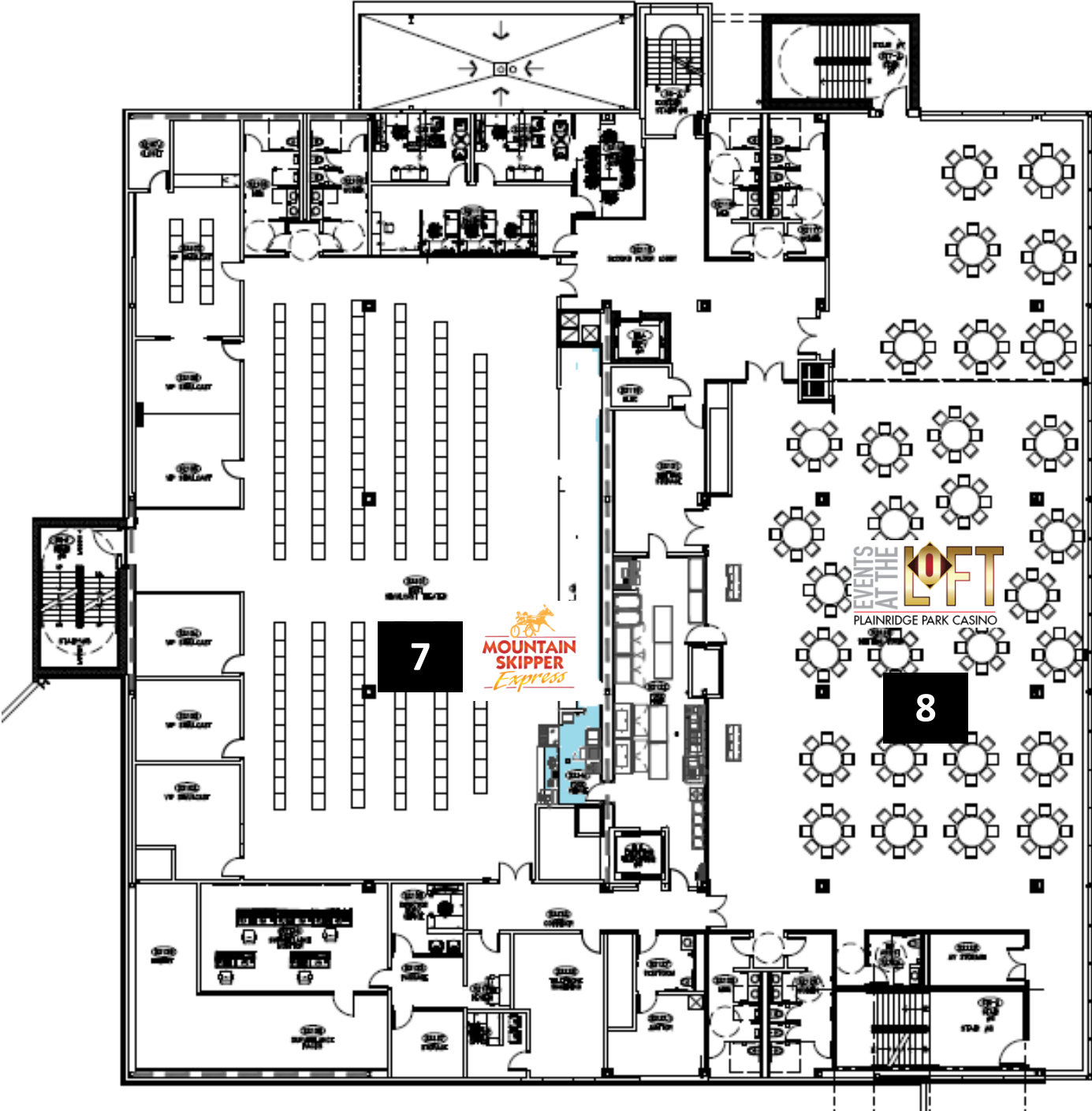
Areas of Beverage Service on Property



Casino & Racing 1st Floor



Racing Building 2nd Floor



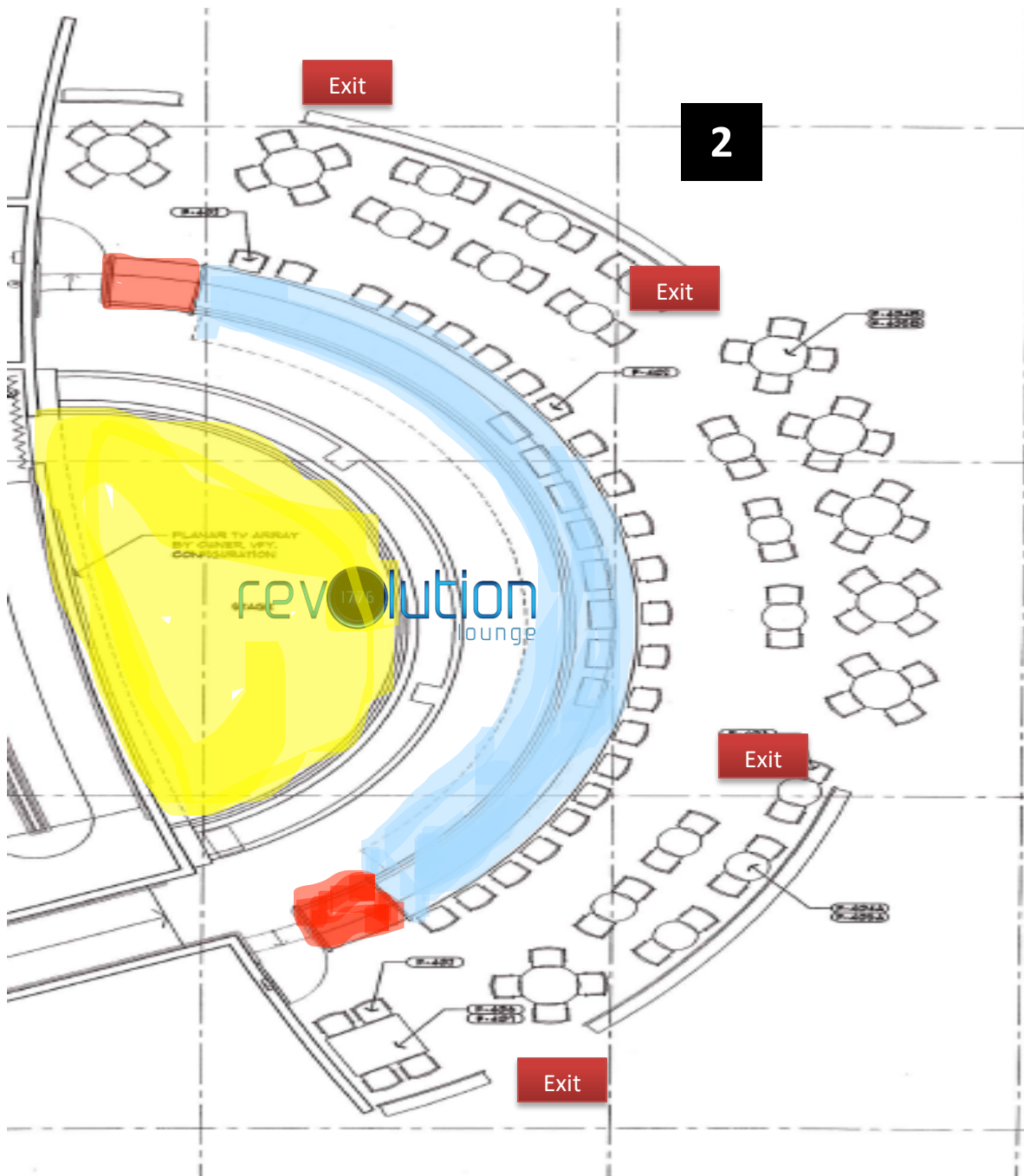
1 & 10 - Casino Gaming Floor & High Limit/VIP Lounge



Beverage Manager – Nicholas Insana

Assistant Manager – Derek Viveiros

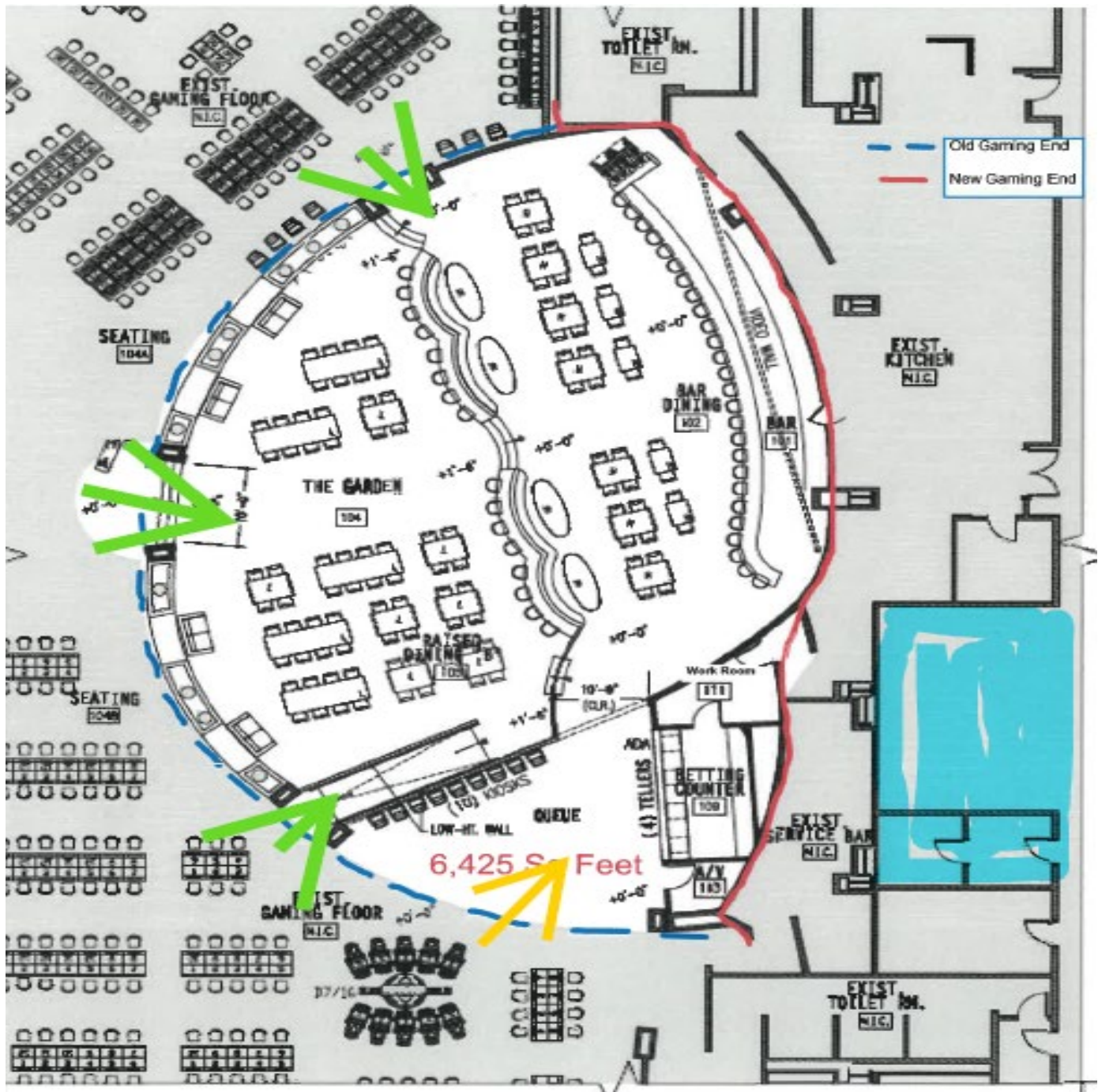
2 – Revolution 1776 Lounge



Beverage Manager – Nicholas Insana

Assistant Manager – Nia Bennoch

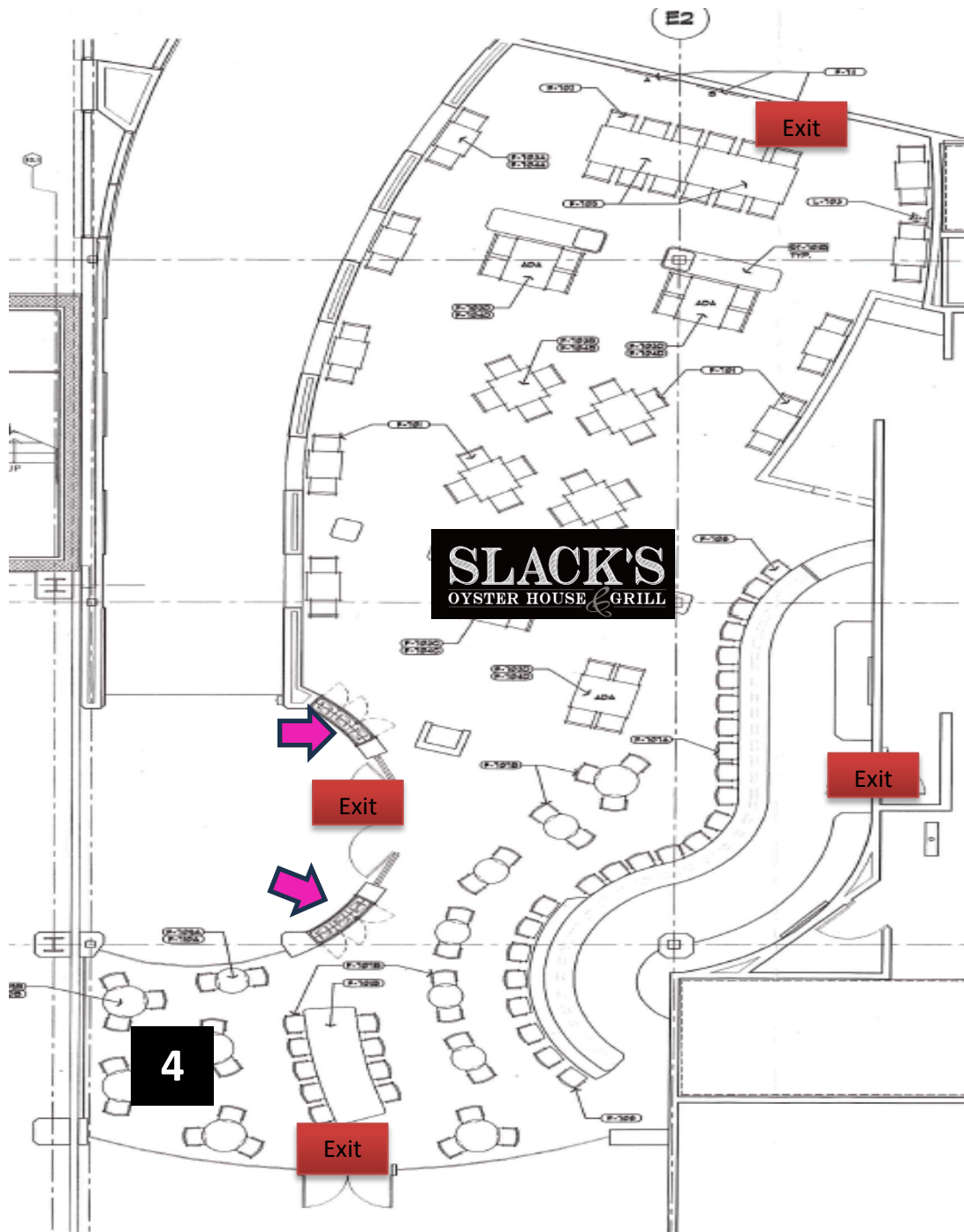
3 – The Sportsbook at Plainridge



Sportsbook Manager – James Swindelles

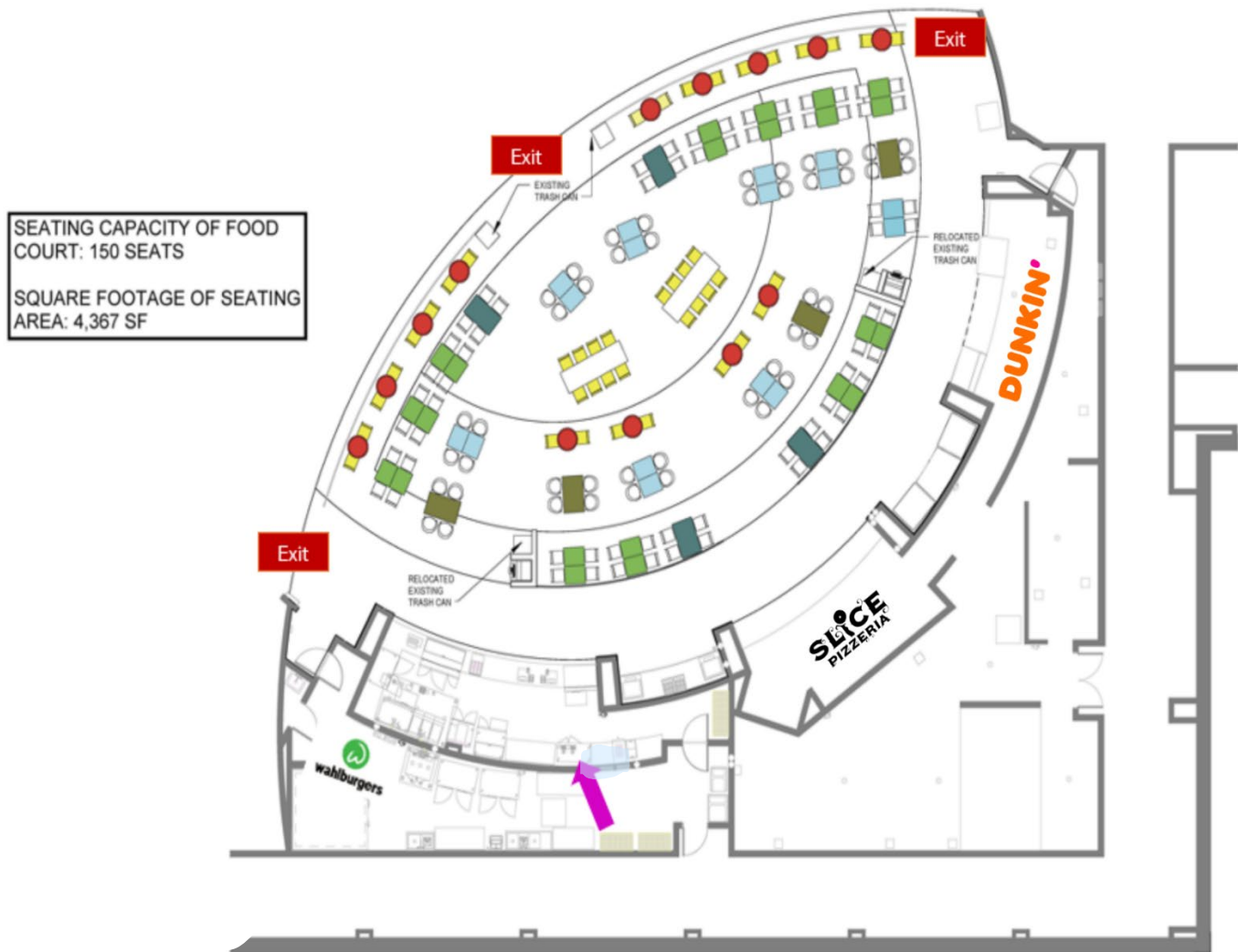
Assistant Manager – Cassidy Gifford

4 – Slack's Oyster House & Grill



Slacks Manager – Peter Dowd

5 – Food Court (Wahlburgers & Slice)

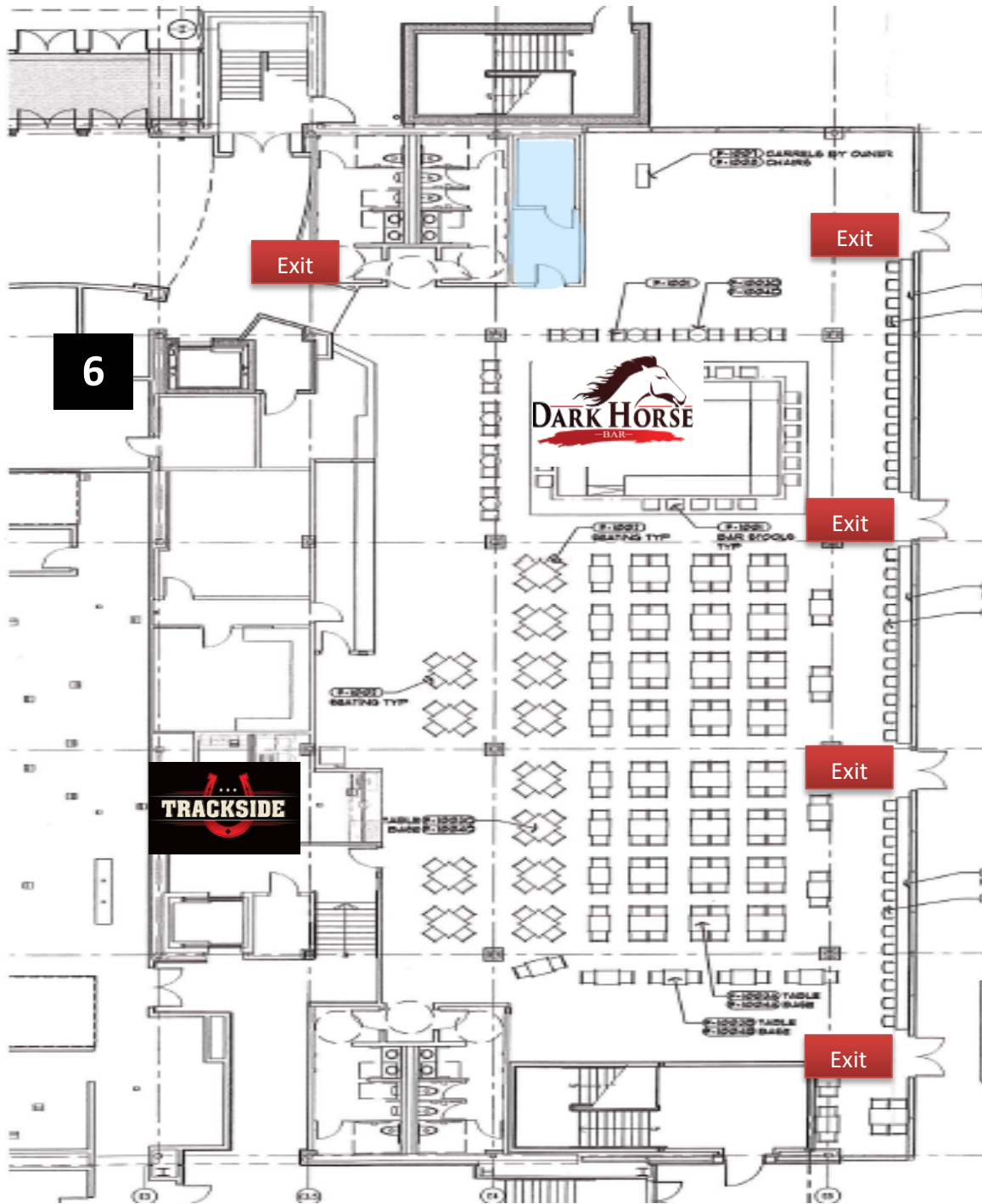


Beverage Manager – Nicholas Insana

Assistant Manager – Nia Bennoch

Assistant Manager – Derek Viveiros

6 – 1st Floor Racing (Dark Horse & Trackside)

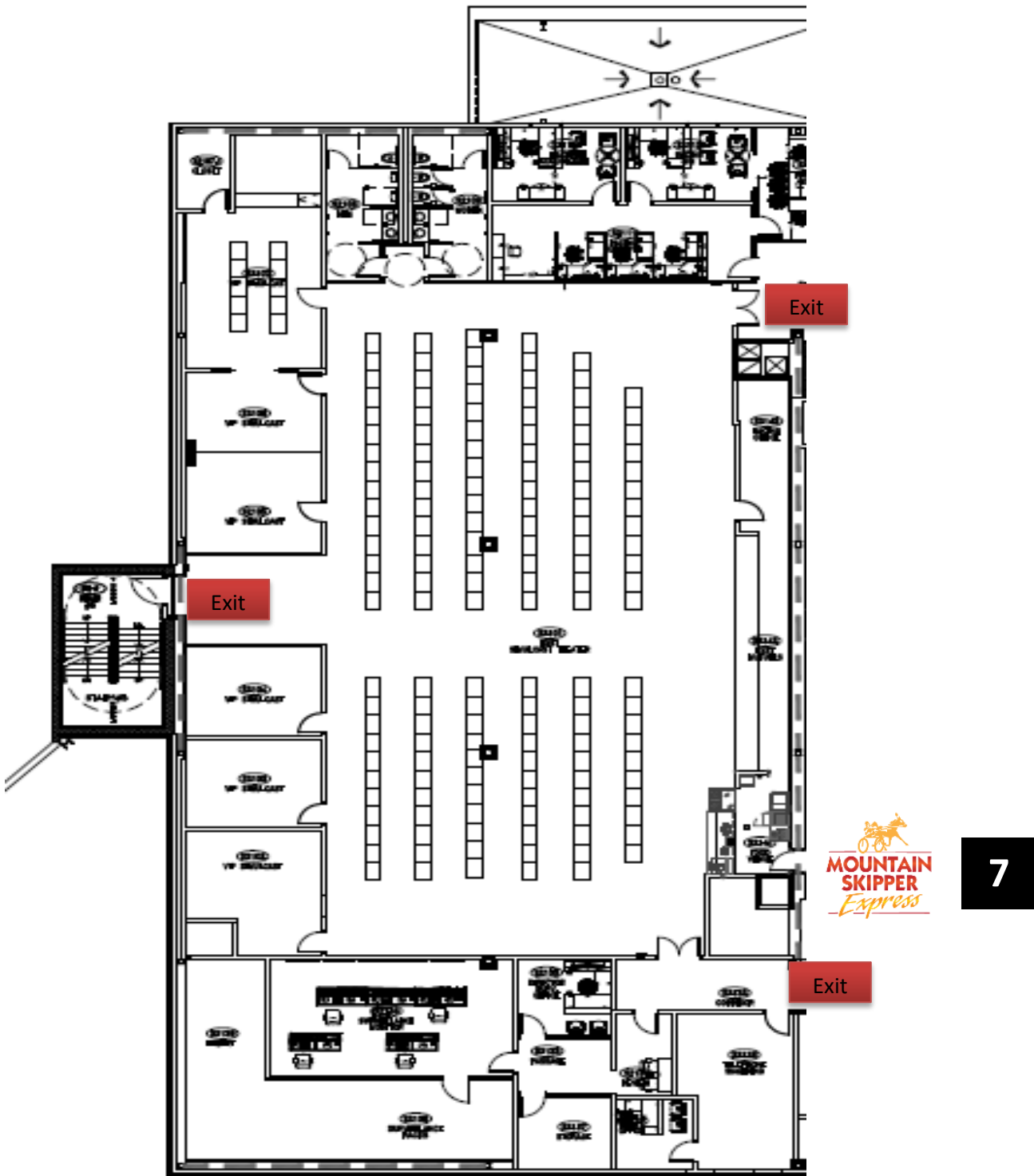


Beverage Manager – Nicholas Insana

Assistant Manager – Derek Viveiros

Assistant Manager Nia Bennoch

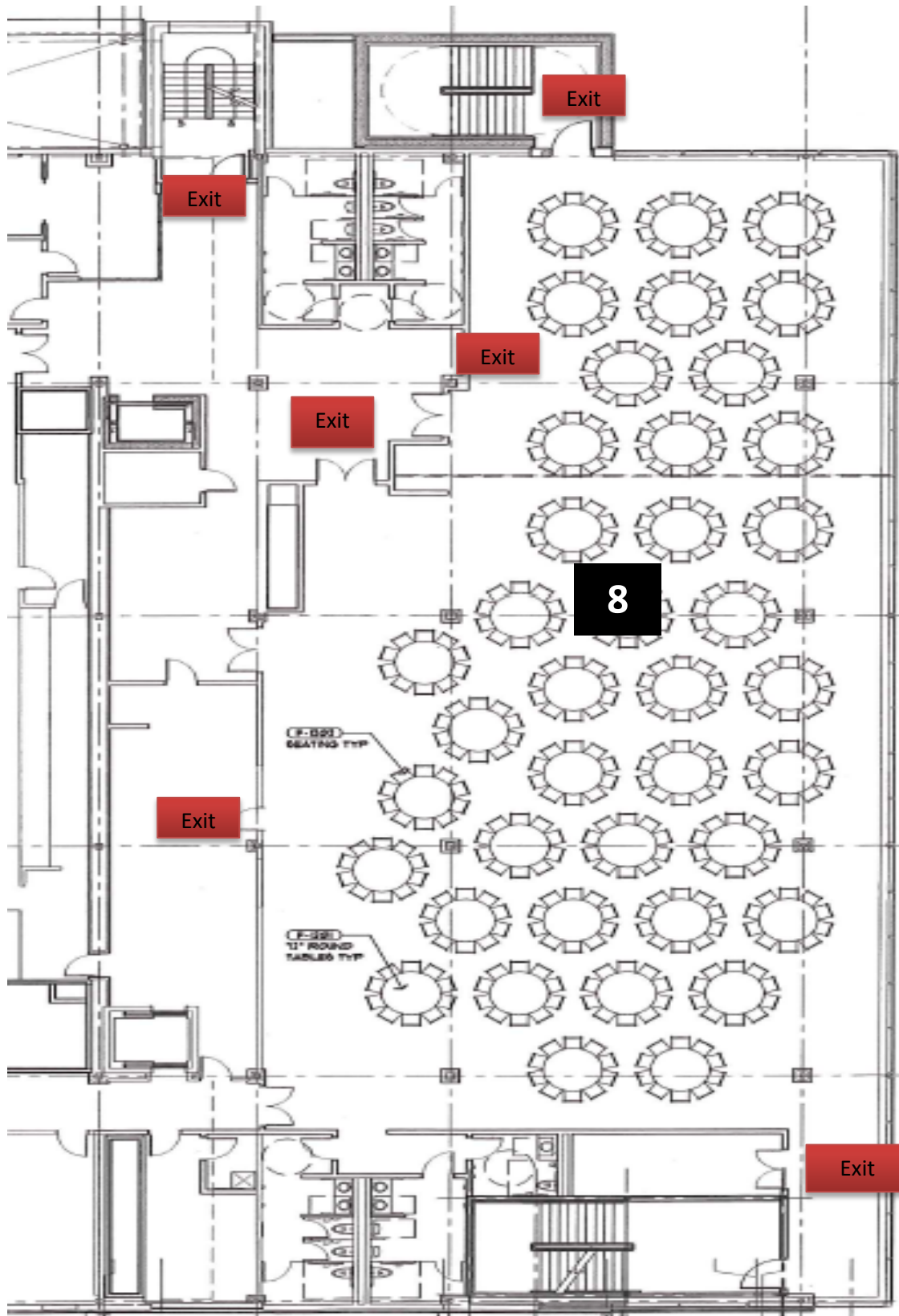
7 – Mountain Skipper Express



Food Court Manager – Glefska Lopez

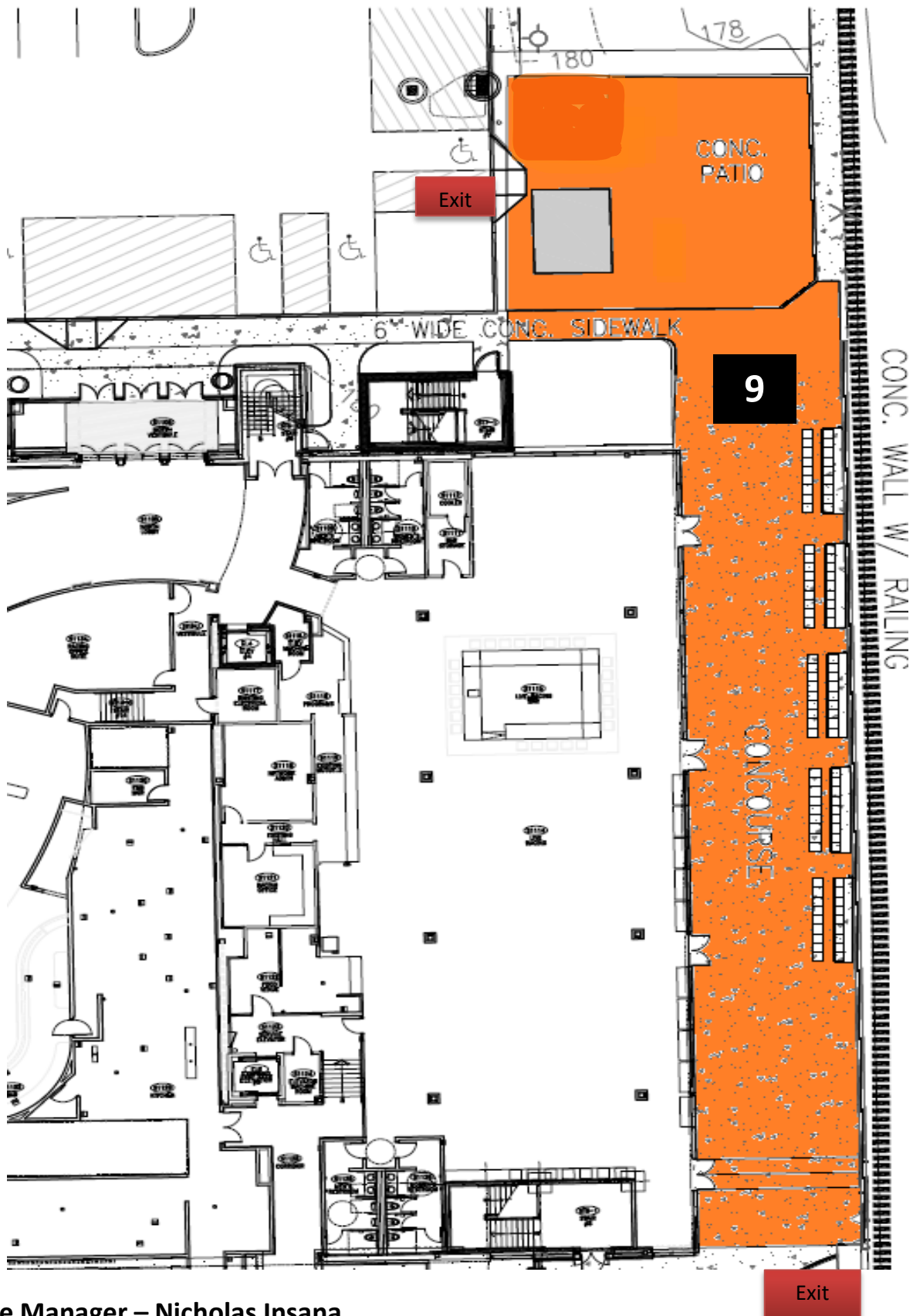
Assistant Manager – Jessica Ricciarelli

8 - The Loft, Banquet Event Space



Banquet Sales Manager – Matthew Carey

9 – Racing Apron/Outside Bar

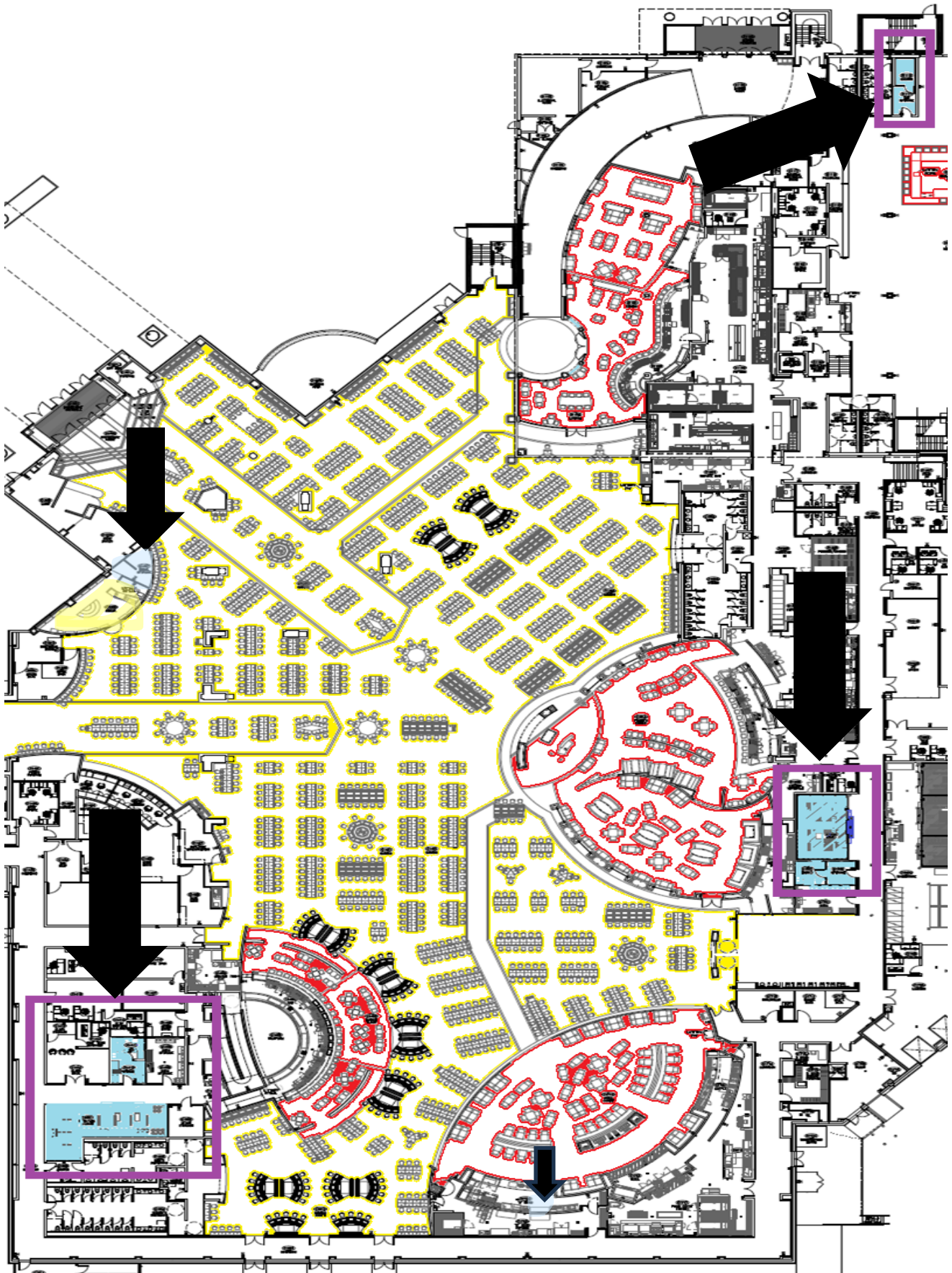


Beverage Manager – Nicholas Insana

Assistant Manager – Derek Viveiros

Assistant Manager – Nia Bennoch

After Hours Liquor, Wine, and Beer Storage Locations





GAMING BEVERAGE LICENSE AMENDMENT APPLICATION FORM

REASON FOR FILING AMENDMENT REQUEST

NAME OF GAMING LICENSEE

Plainville Gaming and Redevelopment, LLC., d/b/a Plainridge Park Casino (PPC)

ADDRESS OF GAMING ESTABLISHMENT

Plainridge Park Casino
301 Washington Street,
Plainville, MA, 02762

NAME OF CONTACT INDIVIDUAL FOR PURPOSES OF THE PROCESS

Lisa McKenney, Compliance Mgr.

CONTACT INDIVIDUAL TELEPHONE NUMBER AND EMAIL ADDRESS

508-576-4409, (M) 860-235-3009, lisa.mckenney@pennetertainment.com

NAME AND LICENSE NUMBER OF LICENSED AREA YOU ARE REQUESTING TO AMEND

Casino Gaming Floor MGCGBL1-R3

REASON FOR FILING AMENDMENT REQUEST (PLEASE CHECK THE APPLICABLE BOX)

- | | |
|---|---|
| ☐ NEW LICENSED AREA | ☐ DESCRIPTION OF LICENSED AREA |
| ☐ CHANGE IN CAPACITY | ☐ ALCOHOL STORAGE |
| ☐ JOINTLY RESPONSIBLE PERSON | ☒ CHANGE OF HOURS |

FEE

The fee for an application to amend a gaming beverage license is **\$100.00**

LICENSED AREAS

A licensed area is a specific, limited, and defined space within a gaming establishment wherein the sale, distribution, or storage of alcoholic beverages to be drunk on the premises is permitted pursuant to a gaming beverage license. A licensed area amendment application must be submitted for each area of the gaming establishment that the gaming licensee desires to have designated as a licensed area and/or storage area.

A floor plan of the gaming establishment indicating the location of each licensed area identified below, and a diagram of each licensed area, must accompany the submission of this amendment application. If alcoholic beverages will be stored outside of a licensed area, storage areas must be identified on the floor plan.

IMPORTANT INFORMATION

The Massachusetts Public Records Law (Law), <http://www.sec.state.ma.us/pre/preidx.htm> found in Chapter 66, Section 10 of the Massachusetts General Laws, applies to records made or received by a Massachusetts governmental entity. Unless the requested records fall under an exemption to the Law, the responsive documents must be made available to the requester. A list of exemptions may be found in Chapter 4, Section 7(26) of the Massachusetts General Laws.

LICENSED AREA

NAME OF LICENSED AREA

Casino Gaming Floor

DESCRIPTION OF AMENDED LICENSED AREA

DESCRIPTION OF THE AMENDED LICENSED AREA INCLUDING BUT NOT LIMITED TO: BUSINESS CONCEPT, DESCRIPTION OF AREA INCLUDING WHETHER THE AREA IS CLOSED OR OPEN SPACE, NUMBER AND LOCATION OF ALCOHOLIC BEVERAGE DISPENSING AREAS, AND PLACEMENT OF EXITS.

(NOTE: A FLOOR PLAN OF THE LICENSED AREA DEPICTING THESE INDIVIDUAL ELEMENTS SHALL BE ATTACHED).

NUMBER AND/OR COLOR OF AREA ON FLOOR PLAN: #1 Casino Gaming Floor (Yellow) & High Limit/VIP Lounge

The purpose of this amendment is to modify the approved hours of operation by extending the closing time from 1:00 a.m. to 2:00 a.m., while maintaining the current opening time of 8:00 a.m.

Casino Gaming Floor has 1500 seats with 1250 gaming devices & is highlighted in Yellow on the #1 Casino Gaming Floor plan. There are two (2) alcohol dispensing Service Bars (highlighted blue) around the gaming floor where the beverage servers will dispense their own liquor drinks in the service bars colored blue, through a measured pouring system that is directly connected to the register. They will also have access to 4 draft beer selections dispensed in the same manner. Bottle beers will be available in a reach in refrigerator. On high-volume days, a portable bar serving beer, wine, and spirits may be added to the casino floor. Additionally, up to two mobile beverage carts offering a selection of beer, wine, pre-mixed cocktails, and non-alcoholic beverages may be deployed on the casino floor to enhance guest service and accommodate increased patron demand.

All exits are shown in red.

Bottle service will not be offered.

HOURS OF OPERATION

8am to 2am

CAPACITY OF LICENSE AREA

3750 Occupants /43,800 sq ft

WILL YOU PROVIDE BOTTLE SERVICE? YES ☐ NO ☒ If YES, PLEASE ELABORATE

ALCOHOL STORAGE

DESCRIBE THE MANNER IN WHICH ALCOHOLIC BEVERAGES WILL BE STORED AND SECURED WHEN LICENSED AREA IS NOT IN USE. (IF STORAGE AREA IS OUTSIDE OF LICENSED AREA, THIS STORAGE AREA SHALL BE DEPICTED ON THE FLOOR PLAN).

Beer will be in locked in reach in coolers. Liquor towers will be locked out with a key. Red Wines from the service wells will be placed in the liquor storage area located behind Revolution 1776 Lounge shown highlighted in blue on the After Hours Liquor, Wine, and Beer Storage Locations.

When a beverage cart is running low on product, the cocktail/beverage server will restock their cart with the assistance of a barback via PPC's existing approved beverage storage locations: restocking will be through the walk in storage coolers located near the Revolution Lounge or The Sportsbook Restaurant or if few items are needed (such as 6 beers), the cocktail/beverage server can replenish the items via our existing approved beverage server wells.

NAME AND EMPLOYEE LICENSE/REGISTRATION NUMBER OF MANAGER OF LICENSED AREA

Matthew Carey- Food and Beverage Director- GKS23-0074

JOINTLY RESPONSIBLE PERSON

IDENTIFY THE JOINTLY RESPONSIBLE PERSON (IF ANY) FOR THE LICENSED AREA BY NAME, CONTACT INFORMATION, VENDOR LICENSE OR REGISTRATION NUMBER, AND ATTACH EVIDENCE THAT THE LICENSEE MAINTAINS AUTHORITY OVER THE JOINTLY RESPONSIBLE PERSON.

ATTESTATION

I, Matthew Carey, hereby affirm under the pains and penalties of perjury that the information contained in this application, including all attachments, is true and accurate to the best of my knowledge and understanding.



Signature

Matthew Carey

Print Name

F&B Director

Title

7/28/2026

Date



GAMING BEVERAGE LICENSE AMENDMENT APPLICATION FORM

REASON FOR FILING AMENDMENT REQUEST

NAME OF GAMING LICENSEE

Plainville Gaming and Redevelopment, LLC., d/b/a Plainridge Park Casino (PPC)

ADDRESS OF GAMING ESTABLISHMENT

Plainridge Park Casino
301 Washington Street,
Plainville, MA, 02762

NAME OF CONTACT INDIVIDUAL FOR PURPOSES OF THE PROCESS

Lisa McKenney, Compliance Mgr.

CONTACT INDIVIDUAL TELEPHONE NUMBER AND EMAIL ADDRESS

508-576-4409, (M) 860-235-3009, lisa.mckenney@pennetertainment.com

NAME AND LICENSE NUMBER OF LICENSED AREA YOU ARE REQUESTING TO AMEND

Revolution 1776 Lounge MGCGBL1-R3

REASON FOR FILING AMENDMENT REQUEST (PLEASE CHECK THE APPLICABLE BOX)

- | | |
|---|---|
| ☐ NEW LICENSED AREA | ☐ DESCRIPTION OF LICENSED AREA |
| ☐ CHANGE IN CAPACITY | ☐ ALCOHOL STORAGE |
| ☐ JOINTLY RESPONSIBLE PERSON | ☒ CHANGE OF HOURS |

FEE

The fee for an application to amend a gaming beverage license is \$100.00

LICENSED AREAS

A licensed area is a specific, limited, and defined space within a gaming establishment wherein the sale, distribution, or storage of alcoholic beverages to be drunk on the premises is permitted pursuant to a gaming beverage license. A licensed area amendment application must be submitted for each area of the gaming establishment that the gaming licensee desires to have designated as a licensed area and/or storage area.

A floor plan of the gaming establishment indicating the location of each licensed area identified below, and a diagram of each licensed area, must accompany the submission of this amendment application. If alcoholic beverages will be stored outside of a licensed area, storage areas must be identified on the floor plan.

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LICENSED AREA

NAME OF LICENSED AREA

Revolution 1776 Lounge

DESCRIPTION OF AMENDED LICENSED AREA

DESCRIPTION OF THE AMENDED LICENSED AREA INCLUDING BUT NOT LIMITED TO: BUSINESS CONCEPT, DESCRIPTION OF AREA INCLUDING WHETHER THE AREA IS CLOSED OR OPEN SPACE, NUMBER AND LOCATION OF ALCOHOLIC BEVERAGE DISPENSING AREAS, AND PLACEMENT OF EXITS.

(NOTE: A FLOOR PLAN OF THE LICENSED AREA DEPICTING THESE INDIVIDUAL ELEMENTS SHALL BE ATTACHED).

NUMBER AND/OR COLOR OF AREA ON FLOOR PLAN: #2 Revolution 1776 Lounge floor plan, Casino & Racing 1st Floor plan (Purple)

The purpose of this amendment is to modify the approved hours of operation by extending the closing time from 1:00 a.m. to 2:00 a.m., while maintaining the current opening time of 8:00 a.m.

Revolution 1776 Lounge is a full service open plan bar that it is highlighted in Purple on the Casino & Racing 1st Floor, floor plan and a larger version is available for review on the #2 Revolution 1776 Lounge floor plan (no color). There will be live entertainment from the stage highlighted yellow on the #2 Revolution 1776 Lounge floor plan. The bar area is highlighted blue on the #2 floor plan. Liquor is primarily dispensed through a measured gun system connected to the point of sale system. Free pour liquor will be measured with a Jigger device. There are 18 draft beer taps in the venue. There are 2 areas highlighted in red where there will be pick up service for servers on the casino floor or servers working the tables in front of the bar.

There are 4 points of exit in the restaurant marked in red below.

Bottle service will not be offered in this venue.

HOURS OF OPERATION

8am to 2am

CAPACITY OF LICENSE AREA

169 Occupants / 2351 sq ft

WILL YOU PROVIDE BOTTLE SERVICE? Yes ☐ No ☒ If YES, PLEASE ELABORATE

ALCOHOL STORAGE

DESCRIBE THE MANNER IN WHICH ALCOHOLIC BEVERAGES WILL BE STORED AND SECURED WHEN LICENSED AREA IS NOT IN USE. (IF STORAGE AREA IS OUTSIDE OF LICENSED AREA, THIS STORAGE AREA SHALL BE DEPICTED ON THE FLOOR PLAN).

Liquor will be removed from the back bar on a nightly basis and be secured in locked cabinets below the bar, locked in rolling cages, or in the liquor storage that is located in the hallway at the rear of the bar highlighted light blue in the After Hours Liquor, Wine, and Beer Storage Locations floor plan. The measured gun system and beer taps will be locked.

NAME AND EMPLOYEE LICENSE/REGISTRATION NUMBER OF MANAGER OF LICENSED AREA

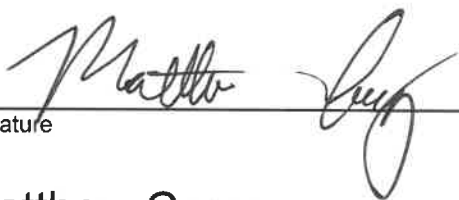
Matthew Carey- Food and Beverage Director- GKS23-0074

JOINTLY RESPONSIBLE PERSON

IDENTIFY THE JOINTLY RESPONSIBLE PERSON (IF ANY) FOR THE LICENSED AREA BY NAME, CONTACT INFORMATION, VENDOR LICENSE OR REGISTRATION NUMBER, AND ATTACH EVIDENCE THAT THE LICENSEE MAINTAINS AUTHORITY OVER THE JOINTLY RESPONSIBLE PERSON.

ATTESTATION

I, Matthew Carey, hereby affirm under the pains and penalties of perjury that the information contained in this application, including all attachments, is true and accurate to the best of my knowledge and understanding.



Signature

Matthew Carey

Print Name

F&B Director

Title

7/28/2026

Date



GAMING BEVERAGE LICENSE AMENDMENT APPLICATION FORM

REASON FOR FILING AMENDMENT REQUEST

NAME OF GAMING LICENSEE

Plainville Gaming and Redevelopment, LLC., d/b/a Plainridge Park Casino (PPC)

ADDRESS OF GAMING ESTABLISHMENT

Plainridge Park Casino
301 Washington Street,
Plainville, MA, 02762

NAME OF CONTACT INDIVIDUAL FOR PURPOSES OF THE PROCESS

Lisa McKenney, Compliance Mgr.

CONTACT INDIVIDUAL TELEPHONE NUMBER AND EMAIL ADDRESS

508-576-4409, (M) 860-235-3009, lisa.mckenney@pennetertainment.com

NAME AND LICENSE NUMBER OF LICENSED AREA YOU ARE REQUESTING TO AMEND

The Sportsbook MGCGBL1-R3

REASON FOR FILING AMENDMENT REQUEST (PLEASE CHECK THE APPLICABLE BOX)

- | | |
|---|---|
| ☐ NEW LICENSED AREA | ☐ DESCRIPTION OF LICENSED AREA |
| ☐ CHANGE IN CAPACITY | ☐ ALCOHOL STORAGE |
| ☐ JOINTLY RESPONSIBLE PERSON | ☒ CHANGE OF HOURS |

FEE

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A floor plan of the gaming establishment indicating the location of each licensed area identified below, and a diagram of each licensed area, must accompany the submission of this amendment application. If alcoholic beverages will be stored outside of a licensed area, storage areas must be identified on the floor plan.

IMPORTANT INFORMATION

The Massachusetts Public Records Law (Law), <http://www.sec.state.ma.us/pre/preidx.htm> found in Chapter 66, Section 10 of the Massachusetts General Laws, applies to records made or received by a Massachusetts governmental entity. Unless the requested records fall under an exemption to the Law, the responsive documents must be made available to the requester. A list of exemptions may be found in Chapter 4, Section 7(26) of the Massachusetts General Laws.

LICENSED AREA

NAME OF LICENSED AREA

Revolution 1776 Lounge

DESCRIPTION OF AMENDED LICENSED AREA

DESCRIPTION OF THE AMENDED LICENSED AREA INCLUDING BUT NOT LIMITED TO: BUSINESS CONCEPT, DESCRIPTION OF AREA INCLUDING WHETHER THE AREA IS CLOSED OR OPEN SPACE, NUMBER AND LOCATION OF ALCOHOLIC BEVERAGE DISPENSING AREAS, AND PLACEMENT OF EXITS.

(NOTE: A FLOOR PLAN OF THE LICENSED AREA DEPICTING THESE INDIVIDUAL ELEMENTS SHALL BE ATTACHED).

NUMBER AND/OR COLOR OF AREA ON FLOOR PLAN: #3 The Sportsbook at Plainridge floor plan, Casino & Racing 1st Floor (Red)

The purpose of this amendment is to modify the approved hours of operation by extending the closing time from midnight to 2:00 a.m. and changing the current opening time from 11:00 a.m. to 8:00 a.m.

The Sportsbook at Plainridge is an open space sports themed restaurant with a full service bar and is highlighted in red on the Casino & Racing Floor, floor plan. There are 187 seats in the venue. There will be bartenders and food servers serving both food and beverages in the venue. Servers will send their drink orders through the point of sale system. This will be printed out at the bar and prepared for the server to pick up. There are 28 tables 161 seats including 26 seats at the bar. Liquor is primarily dispensed through a measured gun system connected to the point of sale system. Free pour liquor will be measured with a jigger device. There are 24 draft beer taps in the venue.

There are 3 points of exit in the restaurant as marked in green arrows on the #3 Sportsbook at Plainridge floor plan map provided. An additional point of entry/exit (marked with a yellow arrow) to this space exists via the designated entrance to the sports betting counter area.

Bottle service will not be offered in this venue.

HOURS OF OPERATION

8am to 2am

CAPACITY OF LICENSE AREA

187 occupants / 6,425 sq ft

WILL YOU PROVIDE BOTTLE SERVICE? Yes ☐ No ☒ **IF YES, PLEASE ELABORATE**

ALCOHOL STORAGE

DESCRIBE THE MANNER IN WHICH ALCOHOLIC BEVERAGES WILL BE STORED AND SECURED WHEN LICENSED AREA IS NOT IN USE. (IF STORAGE AREA IS OUTSIDE OF LICENSED AREA, THIS STORAGE AREA SHALL BE DEPICTED ON THE FLOOR PLAN).

Liquor will be removed from the bar on a nightly basis and be secured in the liquor storage that is located in the hallway at the rear of the restaurant highlighted light blue on the #3 Sportsbook at Plainridge and Casino & Racing 1st Floor, provided floor plans. Bottled beer is locked in coolers behind the bar. The measured gun system and beer taps are locked. Wine and Liquor is stored in a cabinet/rolling cage located behind the bar and locked.

NAME AND EMPLOYEE LICENSE/REGISTRATION NUMBER OF MANAGER OF LICENSED AREA

Matthew Carey- Food and Beverage Director- GKS23-0074

JOINTLY RESPONSIBLE PERSON

IDENTIFY THE JOINTLY RESPONSIBLE PERSON (IF ANY) FOR THE LICENSED AREA BY NAME, CONTACT INFORMATION, VENDOR LICENSE OR REGISTRATION NUMBER, AND ATTACH EVIDENCE THAT THE LICENSEE MAINTAINS AUTHORITY OVER THE JOINTLY RESPONSIBLE PERSON.

ATTESTATION

I, Matthew Carey, hereby affirm under the pains and penalties of perjury that the information contained in this application, including all attachments, is true and accurate to the best of my knowledge and understanding.



Signature

Matthew Carey

Print Name

F&B Director

Title

7/28/2026

Date



GAMING BEVERAGE LICENSE AMENDMENT APPLICATION FORM

REASON FOR FILING AMENDMENT REQUEST

NAME OF GAMING LICENSEE

Plainville Gaming and Redevelopment, LLC., d/b/a Plainridge Park Casino (PPC)

ADDRESS OF GAMING ESTABLISHMENT

Plainridge Park Casino
301 Washington Street,
Plainville, MA, 02762

NAME OF CONTACT INDIVIDUAL FOR PURPOSES OF THE PROCESS

Lisa McKenney, Compliance Mgr.

CONTACT INDIVIDUAL TELEPHONE NUMBER AND EMAIL ADDRESS

508-576-4409, (M) 860-235-3009, lisa.mckenney@pennetertainment.com

NAME AND LICENSE NUMBER OF LICENSED AREA YOU ARE REQUESTING TO AMEND

Slack's Oyster House & Grill MGCGBL1-R3

REASON FOR FILING AMENDMENT REQUEST (PLEASE CHECK THE APPLICABLE BOX)

- | | |
|---|---|
| ☐ NEW LICENSED AREA | ☐ DESCRIPTION OF LICENSED AREA |
| ☐ CHANGE IN CAPACITY | ☐ ALCOHOL STORAGE |
| ☐ JOINTLY RESPONSIBLE PERSON | ☒ CHANGE OF HOURS |

FEE

The fee for an application to amend a gaming beverage license is \$100.00

LICENSED AREAS

A licensed area is a specific, limited, and defined space within a gaming establishment wherein the sale, distribution, or storage of alcoholic beverages to be drunk on the premises is permitted pursuant to a gaming beverage license. A licensed area amendment application must be submitted for each area of the gaming establishment that the gaming licensee desires to have designated as a licensed area and/or storage area.

A floor plan of the gaming establishment indicating the location of each licensed area identified below, and a diagram of each licensed area, must accompany the submission of this amendment application. If alcoholic beverages will be stored outside of a licensed area, storage areas must be identified on the floor plan.

IMPORTANT INFORMATION

The Massachusetts Public Records Law (Law), <http://www.sec.state.ma.us/pre/preidx.htm> found in Chapter 66, Section 10 of the Massachusetts General Laws, applies to records made or received by a Massachusetts governmental entity. Unless the requested records fall under an exemption to the Law, the responsive documents must be made available to the requester. A list of exemptions may be found in Chapter 4, Section 7(26) of the Massachusetts General Laws.

LICENSED AREA

NAME OF LICENSED AREA

Slacks Oyster House & Grill

DESCRIPTION OF AMENDED LICENSED AREA

DESCRIPTION OF THE AMENDED LICENSED AREA INCLUDING BUT NOT LIMITED TO: BUSINESS CONCEPT, DESCRIPTION OF AREA INCLUDING WHETHER THE AREA IS CLOSED OR OPEN SPACE, NUMBER AND LOCATION OF ALCOHOLIC BEVERAGE DISPENSING AREAS, AND PLACEMENT OF EXITS.

(NOTE: A FLOOR PLAN OF THE LICENSED AREA DEPICTING THESE INDIVIDUAL ELEMENTS SHALL BE ATTACHED).

NUMBER AND/OR COLOR OF AREA ON FLOOR PLAN:

#4 Slack's Oyster House & Grill floor plan and Casino & Racing 1st Floor plan (Green)

The purpose of this amendment is to modify the approved hours of operation by extending the closing time from 1:00a.m. to 2:00 a.m., and changing the current opening time from 11:00am to 8:00 a.m.

Slacks Oyster House and Grill is a closed space, fine dining seafood restaurant that contains a seafood action station and is highlighted in green on the Casino & Racing 1st Floor, floor plan. It has 125 seats, 25 at the bar. Patrons are able to sit at the bar and dine. There is wine storage as you enter the restaurant, marked with pink arrows, which are only accessible from within the restaurant. Liquor is primarily dispensed through a measured gun system connected to the point of sale system. Free pour liquor will be measured with a jigger device. There are two (2) draft beer taps in the venue.

There are three (3) exits from the restaurant as noted by the red filled boxes on the #4 Slack's Oyster House & Grill floor plan.

Bottle service will not be offered in this area.

HOURS OF OPERATION

8am to 2am

CAPACITY OF LICENSE AREA

230 occupants / 3,407 sq. ft.

WILL YOU PROVIDE BOTTLE SERVICE? YES ☐ NO ☒ IF YES, PLEASE ELABORATE

ALCOHOL STORAGE

DESCRIBE THE MANNER IN WHICH ALCOHOLIC BEVERAGES WILL BE STORED AND SECURED WHEN LICENSED AREA IS NOT IN USE. (IF STORAGE AREA IS OUTSIDE OLF LICENSED AREA, THIS STORAGE AREA SHALL BE DEPICTED ON THE FLOOR PLAN).

The venue has lockable doors to secure alcohol when the venue is closed. All liquor will remain out on the back bar.

NAME AND EMPLOYEE LICENSE/REGISTRATION NUMBER OF MANAGER OF LICENSED AREA

Matthew Carey- Food and Beverage Director- GKS23-0074

JOINTLY RESPONSIBLE PERSON

IDENTIFY THE JOINTLY RESPONSIBLE PERSON (IF ANY) FOR THE LICENSED AREA BY NAME, CONTACT INFORMATION, VENDOR LICENSE OR REGISTRATION NUMBER, AND ATTACH EVIDENCE THAT THE LICENSEE MAINTAINS AUTHORITY OVER THE JOINTLY RESPONSIBLE PERSON.

ATTESTATION

I, Matthew Carey, hereby affirm under the pains and penalties of perjury that the information contained in this application, including all attachments, is true and accurate to the best of my knowledge and understanding.



Signature

Matthew Carey

Print Name

F&B Director

Title

7/28/2024

Date



GAMING BEVERAGE LICENSE AMENDMENT APPLICATION FORM

REASON FOR FILING AMENDMENT REQUEST

NAME OF GAMING LICENSEE

Plainville Gaming and Redevelopment, LLC., d/b/a Plainridge Park Casino (PPC)

ADDRESS OF GAMING ESTABLISHMENT

Plainridge Park Casino
301 Washington Street,
Plainville, MA, 02762

NAME OF CONTACT INDIVIDUAL FOR PURPOSES OF THE PROCESS

Lisa McKenney, Compliance Mgr.

CONTACT INDIVIDUAL TELEPHONE NUMBER AND EMAIL ADDRESS

508-576-4409, (M) 860-235-3009, lisa.mckenney@pennetertainment.com

NAME AND LICENSE NUMBER OF LICENSED AREA YOU ARE REQUESTING TO AMEND

Food Court (Wahlburgers & Slice) MGCGBL1-R3

REASON FOR FILING AMENDMENT REQUEST (PLEASE CHECK THE APPLICABLE BOX)

- | | |
|---|---|
| ☐ NEW LICENSED AREA | ☐ DESCRIPTION OF LICENSED AREA |
| ☐ CHANGE IN CAPACITY | ☐ ALCOHOL STORAGE |
| ☐ JOINTLY RESPONSIBLE PERSON | ☒ CHANGE OF HOURS |

FEE

The fee for an application to amend a gaming beverage license is **\$100.00**

LICENSED AREAS

A licensed area is a specific, limited, and defined space within a gaming establishment wherein the sale, distribution, or storage of alcoholic beverages to be drunk on the premises is permitted pursuant to a gaming beverage license. A licensed area amendment application must be submitted for each area of the gaming establishment that the gaming licensee desires to have designated as a licensed area and/or storage area.

A floor plan of the gaming establishment indicating the location of each licensed area identified below, and a diagram of each licensed area, must accompany the submission of this amendment application. If alcoholic beverages will be stored outside of a licensed area, storage areas must be identified on the floor plan.

IMPORTANT INFORMATION

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LICENSED AREA

NAME OF LICENSED AREA

Food Court (Wahlburgers & Slice)

DESCRIPTION OF AMENDED LICENSED AREA

DESCRIPTION OF THE AMENDED LICENSED AREA INCLUDING BUT NOT LIMITED TO: BUSINESS CONCEPT, DESCRIPTION OF AREA INCLUDING WHETHER THE AREA IS CLOSED OR OPEN SPACE, NUMBER AND LOCATION OF ALCOHOLIC BEVERAGE DISPENSING AREAS, AND PLACEMENT OF EXITS.

(NOTE: A FLOOR PLAN OF THE LICENSED AREA DEPICTING THESE INDIVIDUAL ELEMENTS SHALL BE ATTACHED).

NUMBER AND/OR COLOR OF AREA ON FLOOR PLAN:

#5 Food Court (Wahlburgers & Slice) floor plan, Casino Racing 1st Floor, plan (Logos shown)

The purpose of this amendment is to modify the approved hours of operation by extending the closing time from 1:00 a.m. to 2:00 a.m., while maintaining the current opening time of 8:00 a.m.

The food court is a 150 seat restaurant with approximately 42 tables. It has 2 unique food outlets. Slice is a pizza, grab and go outlet. Wahlburgers is a specialty burger, salads and sandwiches themed restaurant. Alcohol service in this restaurant is draft beer and mixed drinks with liquor.

Exits are red boxes on the 5 Food Court (Wahlburgers & Slice) floor plan.

There will not be bottle service.

HOURS OF OPERATION

8am to 2am

CAPACITY OF LICENSE AREA

150 Occupants / 4,367 sq ft

WILL YOU PROVIDE BOTTLE SERVICE? YES ☐ NO ☒ IF YES, PLEASE ELABORATE

ALCOHOL STORAGE

DESCRIBE THE MANNER IN WHICH ALCOHOLIC BEVERAGES WILL BE STORED AND SECURED WHEN LICENSED AREA IS NOT IN USE. (IF STORAGE AREA IS OUTSIDE OF LICENSED AREA, THIS STORAGE AREA SHALL BE DEPICTED ON THE FLOOR PLAN).

Wahlburgers will offer 2 draft beers both dispensed out of one kegerator located in the back left counter as marked by a pink arrow on the #5 Food Court (Wahlburgers & Slice). The liquor bottles will be stored in the kegerator. When the restaurant is closed, the kegerator will be locked and PPC will utilize tap locks to secure the draft beer.

NAME AND EMPLOYEE LICENSE/REGISTRATION NUMBER OF MANAGER OF LICENSED AREA

Matthew Carey- Food and Beverage Director- GKS23-0074

JOINTLY RESPONSIBLE PERSON

IDENTIFY THE JOINTLY RESPONSIBLE PERSON (IF ANY) FOR THE LICENSED AREA BY NAME, CONTACT INFORMATION, VENDOR LICENSE OR REGISTRATION NUMBER, AND ATTACH EVIDENCE THAT THE LICENSEE MAINTAINS AUTHORITY OVER THE JOINTLY RESPONSIBLE PERSON.

ATTESTATION

I, Matthew Carey, hereby affirm under the pains and penalties of perjury that the information contained in this application, including all attachments, is true and accurate to the best of my knowledge and understanding.

Signature

Matthew Carey

Print Name

F&B Director

Title

Date

7/28/2026



GAMING BEVERAGE LICENSE AMENDMENT APPLICATION FORM

REASON FOR FILING AMENDMENT REQUEST

NAME OF GAMING LICENSEE

Plainville Gaming and Redevelopment, LLC., d/b/a Plainridge Park Casino (PPC)

ADDRESS OF GAMING ESTABLISHMENT

Plainridge Park Casino
301 Washington Street,
Plainville, MA, 02762

NAME OF CONTACT INDIVIDUAL FOR PURPOSES OF THE PROCESS

Lisa McKenney, Compliance Mgr.

CONTACT INDIVIDUAL TELEPHONE NUMBER AND EMAIL ADDRESS

508-576-4409, (M) 860-235-3009, lisa.mckenney@pennetertainment.com

NAME AND LICENSE NUMBER OF LICENSED AREA YOU ARE REQUESTING TO AMEND

1st Floor Racing Building (Dark Horse Bar and Trackside Concession) MGCGBL1-R3

REASON FOR FILING AMENDMENT REQUEST (PLEASE CHECK THE APPLICABLE BOX)

- | | |
|---|---|
| ☐ NEW LICENSED AREA | ☐ DESCRIPTION OF LICENSED AREA |
| ☐ CHANGE IN CAPACITY | ☐ ALCOHOL STORAGE |
| ☐ JOINTLY RESPONSIBLE PERSON | ☒ CHANGE OF HOURS |

FEE

The fee for an application to amend a gaming beverage license is \$100.00

LICENSED AREAS

A licensed area is a specific, limited, and defined space within a gaming establishment wherein the sale, distribution, or storage of alcoholic beverages to be drunk on the premises is permitted pursuant to a gaming beverage license. A licensed area amendment application must be submitted for each area of the gaming establishment that the gaming licensee desires to have designated as a licensed area and/or storage area.

A floor plan of the gaming establishment indicating the location of each licensed area identified below, and a diagram of each licensed area, must accompany the submission of this amendment application. If alcoholic beverages will be stored outside of a licensed area, storage areas must be identified on the floor plan.

IMPORTANT INFORMATION

The Massachusetts Public Records Law (Law), <http://www.sec.state.ma.us/pre/preidx.htm> found in Chapter 66, Section 10 of the Massachusetts General Laws, applies to records made or received by a Massachusetts governmental entity. Unless the requested records fall under an exemption to the Law, the responsive documents must be made available to the requester. A list of exemptions may be found in Chapter 4, Section 7(26) of the Massachusetts General Laws.

LICENSED AREA

NAME OF LICENSED AREA

1st Floor Racing Building (Dark Horse Bar and Trackside Concession)

DESCRIPTION OF AMENDED LICENSED AREA

DESCRIPTION OF THE AMENDED LICENSED AREA INCLUDING BUT NOT LIMITED TO: BUSINESS CONCEPT, DESCRIPTION OF AREA INCLUDING WHETHER THE AREA IS CLOSED OR OPEN SPACE, NUMBER AND LOCATION OF ALCOHOLIC BEVERAGE DISPENSING AREAS, AND PLACEMENT OF EXITS.

(NOTE: A FLOOR PLAN OF THE LICENSED AREA DEPICTING THESE INDIVIDUAL ELEMENTS SHALL BE ATTACHED).

NUMBER AND/OR COLOR OF AREA ON FLOOR PLAN:

#6 1st Floor Racing (Dark Horse Bar and Trackside Concession) & Casino Racing 1st Floor (Logos Shown), floor plans

The purpose of this amendment is to modify the approved hours of operation by extending the closing time from 1:00 a.m. to 2:00 a.m., while maintaining the current opening time of 8:00 a.m.

As shown via Logos on the #6 1st Floor Racing (Dark Horse & Trackside) floor plan, the 1st Floor of Racing consists of 2 venues:

- 1) Dark Horse Bar, which is a full service open air bar in the middle of the live racing building. There are 12 beer taps, liquor is measured using jiggers.
- 2) There is a second venue/concession in this area called Trackside as shown via Logo on the #6 1st Floor Racing plan. Trackside offers our patrons with standard food and beverage concessions (hot dogs, chili, sandwiches, chips, candy, soda, etc.). PPC is planning on selling bottled and canned alcoholic beverages from this location.

There are 5 exits highlighted in red boxes on the #6 1st Floor Racing (Dark Horse & Trackside) floor plan.

There is no bottle service in this licensed area.

HOURS OF OPERATION

8am to 2am

CAPACITY OF LICENSE AREA

593 Occupants / 7,400 sq ft

WILL YOU PROVIDE BOTTLE SERVICE? YES ☐ NO ☒ IF YES, PLEASE ELABORATE

ALCOHOL STORAGE

DESCRIBE THE MANNER IN WHICH ALCOHOLIC BEVERAGES WILL BE STORED AND SECURED WHEN LICENSED AREA IS NOT IN USE. (IF STORAGE AREA IS OUTSIDE OF LICENSED AREA, THIS STORAGE AREA SHALL BE DEPICTED ON THE FLOOR PLAN).

Beer bottles/cans are secured in the Dark Horse bar in locked refrigerators. Liquor is removed from the Dark Horse bar and canned mix drinks/beer at Trackside at closing and is secured in a locked area behind the Dark Horse bar. Draft beer is secured in walk-in cooler in a locked storage closet labeled as liquor storage on the Casino & Racing 1st Floor, floor plan and highlighted in blue on the #6 1st Floor Racing (Dark Horse & Trackside) floor plan.

NAME AND EMPLOYEE LICENSE/REGISTRATION NUMBER OF MANAGER OF LICENSED AREA

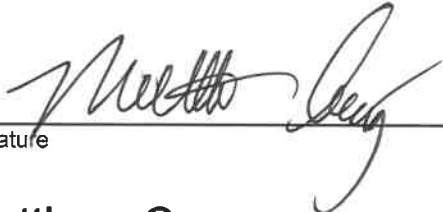
Matthew Carey- Food and Beverage Director- GKS23-0074

JOINTLY RESPONSIBLE PERSON

IDENTIFY THE JOINTLY RESPONSIBLE PERSON (IF ANY) FOR THE LICENSED AREA BY NAME, CONTACT INFORMATION, VENDOR LICENSE OR REGISTRATION NUMBER, AND ATTACH EVIDENCE THAT THE LICENSEE MAINTAINS AUTHORITY OVER THE JOINTLY RESPONSIBLE PERSON.

ATTESTATION

I, Matthew Carey, hereby affirm under the pains and penalties of perjury that the information contained in this application, including all attachments, is true and accurate to the best of my knowledge and understanding.



Signature

Matthew Carey

Print Name

F&B Director

Title

7/28/2026

Date



GAMING BEVERAGE LICENSE AMENDMENT APPLICATION FORM

REASON FOR FILING AMENDMENT REQUEST

NAME OF GAMING LICENSEE

Plainville Gaming and Redevelopment, LLC., d/b/a Plainridge Park Casino (PPC)

ADDRESS OF GAMING ESTABLISHMENT

Plainridge Park Casino
301 Washington Street,
Plainville, MA, 02762

NAME OF CONTACT INDIVIDUAL FOR PURPOSES OF THE PROCESS

Lisa McKenney, Compliance Mgr.

CONTACT INDIVIDUAL TELEPHONE NUMBER AND EMAIL ADDRESS

508-576-4409, (M) 860-235-3009, lisa.mckenney@pennetertainment.com

NAME AND LICENSE NUMBER OF LICENSED AREA YOU ARE REQUESTING TO AMEND

Mountain Skipper Express (Racing Building 2nd floor West Side) MGCGBL1-R3

REASON FOR FILING AMENDMENT REQUEST (PLEASE CHECK THE APPLICABLE BOX)

- | | |
|---|---|
| ☐ NEW LICENSED AREA | ☐ DESCRIPTION OF LICENSED AREA |
| ☐ CHANGE IN CAPACITY | ☐ ALCOHOL STORAGE |
| ☐ JOINTLY RESPONSIBLE PERSON | ☒ CHANGE OF HOURS |

FEE

The fee for an application to amend a gaming beverage license is **\$100.00**

LICENSED AREAS

A licensed area is a specific, limited, and defined space within a gaming establishment wherein the sale, distribution, or storage of alcoholic beverages to be drunk on the premises is permitted pursuant to a gaming beverage license. A licensed area amendment application must be submitted for each area of the gaming establishment that the gaming licensee desires to have designated as a licensed area and/or storage area.

A floor plan of the gaming establishment indicating the location of each licensed area identified below, and a diagram of each licensed area, must accompany the submission of this amendment application. If alcoholic beverages will be stored outside of a licensed area, storage areas must be identified on the floor plan.

IMPORTANT INFORMATION

The Massachusetts Public Records Law (Law), <http://www.sec.state.ma.us/pre/preidx.htm> found in Chapter 66, Section 10 of the Massachusetts General Laws, applies to records made or received by a Massachusetts governmental entity. Unless the requested records fall under an exemption to the Law, the responsive documents must be made available to the requester. A list of exemptions may be found in Chapter 4, Section 7(26) of the Massachusetts General Laws.

LICENSED AREA

NAME OF LICENSED AREA

Mountain Skipper Express (Racing Building 2nd floor West Side)

DESCRIPTION OF AMENDED LICENSED AREA

DESCRIPTION OF THE AMENDED LICENSED AREA INCLUDING BUT NOT LIMITED TO: BUSINESS CONCEPT, DESCRIPTION OF AREA INCLUDING WHETHER THE AREA IS CLOSED OR OPEN SPACE, NUMBER AND LOCATION OF ALCOHOLIC BEVERAGE DISPENSING AREAS, AND PLACEMENT OF EXITS.

(NOTE: A FLOOR PLAN OF THE LICENSED AREA DEPICTING THESE INDIVIDUAL ELEMENTS SHALL BE ATTACHED).

NUMBER AND/OR COLOR OF AREA ON FLOOR PLAN:

#7 Mountain Skipper Express (2nd floor) & Racing Building 2nd Floor, (Logos Shown)plan.

The purpose of this amendment is to modify the approved hours of operation by extending the closing time from 1:00 a.m. to 2:00 a.m., while maintaining the current opening time of 8:00 a.m.

Mountain Skipper Express is a Concession Stand area on the Second floor West of the Racing Building as shown by Logo in both floor plans noted above. This is a grab and go, outlet, serving snacks, hot dogs, beverages, where the customer comes to the counter, orders and sits at the racing carols. Alcohol is sold and secured in a lockable cooler.

There are 3 exits routes from this room as shown on the #7 Mountain Skipper Express (2nd floor) plan.

Bottle Service is not offered in this area.

HOURS OF OPERATION

8am to 2am

CAPACITY OF LICENSE AREA

198 Occupants / 5559 sq ft

WILL YOU PROVIDE BOTTLE SERVICE? YES ☐ NO ☒ IF YES, PLEASE ELABORATE

ALCOHOL STORAGE

DESCRIBE THE MANNER IN WHICH ALCOHOLIC BEVERAGES WILL BE STORED AND SECURED WHEN LICENSED AREA IS NOT IN USE. (IF STORAGE AREA IS OUTSIDE OF LICENSED AREA, THIS STORAGE AREA SHALL BE DEPICTED ON THE FLOOR PLAN).

Draft beer, bottled beer, and wine is secured in a locked cooler. Liquor is secured in a designated, locked liquor storage room.

NAME AND EMPLOYEE LICENSE/REGISTRATION NUMBER OF MANAGER OF LICENSED AREA

Matthew Carey- Food and Beverage Director- GKS23-0074

JOINTLY RESPONSIBLE PERSON

IDENTIFY THE JOINTLY RESPONSIBLE PERSON (IF ANY) FOR THE LICENSED AREA BY NAME, CONTACT INFORMATION, VENDOR LICENSE OR REGISTRATION NUMBER, AND ATTACH EVIDENCE THAT THE LICENSEE MAINTAINS AUTHORITY OVER THE JOINTLY RESPONSIBLE PERSON.

ATTESTATION

I, Matthew Carey, hereby affirm under the pains and penalties of perjury that the information contained in this application, including all attachments, is true and accurate to the best of my knowledge and understanding.



Signature

Matthew Carey

Print Name

F&B Director

Title

7/28/2026

Date



GAMING BEVERAGE LICENSE AMENDMENT APPLICATION FORM

REASON FOR FILING AMENDMENT REQUEST

NAME OF GAMING LICENSEE

Plainville Gaming and Redevelopment, LLC., d/b/a Plainridge Park Casino (PPC)

ADDRESS OF GAMING ESTABLISHMENT

Plainridge Park Casino
301 Washington Street,
Plainville, MA, 02762

NAME OF CONTACT INDIVIDUAL FOR PURPOSES OF THE PROCESS

Lisa McKenney, Compliance Mgr.

CONTACT INDIVIDUAL TELEPHONE NUMBER AND EMAIL ADDRESS

508-576-4409, (M) 860-235-3009, lisa.mckenney@pennetertainment.com

NAME AND LICENSE NUMBER OF LICENSED AREA YOU ARE REQUESTING TO AMEND

The Loft, Banquet Event Space MGCGBL1-R3

REASON FOR FILING AMENDMENT REQUEST (PLEASE CHECK THE APPLICABLE BOX)

- | | |
|---|---|
| ☐ NEW LICENSED AREA | ☐ DESCRIPTION OF LICENSED AREA |
| ☐ CHANGE IN CAPACITY | ☐ ALCOHOL STORAGE |
| ☐ JOINTLY RESPONSIBLE PERSON | ☒ CHANGE OF HOURS |

FEE

The fee for an application to amend a gaming beverage license is **\$100.00**

LICENSED AREAS

A licensed area is a specific, limited, and defined space within a gaming establishment wherein the sale, distribution, or storage of alcoholic beverages to be drunk on the premises is permitted pursuant to a gaming beverage license. A licensed area amendment application must be submitted for each area of the gaming establishment that the gaming licensee desires to have designated as a licensed area and/or storage area.

A floor plan of the gaming establishment indicating the location of each licensed area identified below, and a diagram of each licensed area, must accompany the submission of this amendment application. If alcoholic beverages will be stored outside of a licensed area, storage areas must be identified on the floor plan.

IMPORTANT INFORMATION

The Massachusetts Public Records Law (Law), <http://www.sec.state.ma.us/pre/preidx.htm> found in Chapter 66, Section 10 of the Massachusetts General Laws, applies to records made or received by a Massachusetts governmental entity. Unless the requested records fall under an exemption to the Law, the responsive documents must be made available to the requester. A list of exemptions may be found in Chapter 4, Section 7(26) of the Massachusetts General Laws.

LICENSED AREA

NAME OF LICENSED AREA

The Loft, Banquet Event Space

DESCRIPTION OF AMENDED LICENSED AREA

DESCRIPTION OF THE AMENDED LICENSED AREA INCLUDING BUT NOT LIMITED TO: BUSINESS CONCEPT, DESCRIPTION OF AREA INCLUDING WHETHER THE AREA IS CLOSED OR OPEN SPACE, NUMBER AND LOCATION OF ALCOHOLIC BEVERAGE DISPENSING AREAS, AND PLACEMENT OF EXITS.

(NOTE: A FLOOR PLAN OF THE LICENSED AREA DEPICTING THESE INDIVIDUAL ELEMENTS SHALL BE ATTACHED).

NUMBER AND/OR COLOR OF AREA ON FLOOR PLAN: #8 The Loft, Banquet Event Space & Racing Building 2nd Floor (Logo Shown)

The purpose of this amendment is to modify the approved hours of operation by extending the closing time from 1:00 a.m. to 2:00 a.m., while maintaining the current opening time of 8:00 a.m.

Banquet event space is used for meetings, social events, and business events. Portable bars are set up in these locations when they are requested by the clients. We will give the guest options of hosted bars, cash bars, or inclusive price bars. Portable bars will be placed as the guest request it.

There are 3 main exits out of the area and 2 secondary exits, highlighted in red on the #8 The Loft, Banquet Event Space plan. The room has an air-wall to separate the 2 rooms.

Bottle Service will not be offered in these rooms.

HOURS OF OPERATION

8am to 2am

CAPACITY OF LICENSE AREA

500 Occupants / 7,534 sq ft

WILL YOU PROVIDE BOTTLE SERVICE? YES ☐ NO ☒ IF YES, PLEASE ELABORATE

ALCOHOL STORAGE

DESCRIBE THE MANNER IN WHICH ALCOHOLIC BEVERAGES WILL BE STORED AND SECURED WHEN LICENSED AREA IS NOT IN USE. (IF STORAGE AREA IS OUTSIDE OF LICENSED AREA, THIS STORAGE AREA SHALL BE DEPICTED ON THE FLOOR PLAN).

Alcohol will be brought to the venue when needed and immediately after event is finished will be returned to a designated liquor storage area.

NAME AND EMPLOYEE LICENSE/REGISTRATION NUMBER OF MANAGER OF LICENSED AREA

Matthew Carey- Food and Beverage Director- GKS23-0074

JOINTLY RESPONSIBLE PERSON

IDENTIFY THE JOINTLY RESPONSIBLE PERSON (IF ANY) FOR THE LICENSED AREA BY NAME, CONTACT INFORMATION, VENDOR LICENSE OR REGISTRATION NUMBER, AND ATTACH EVIDENCE THAT THE LICENSEE MAINTAINS AUTHORITY OVER THE JOINTLY RESPONSIBLE PERSON.

ATTESTATION

I, Matthew Carey, hereby affirm under the pains and penalties of perjury that the information contained in this application, including all attachments, is true and accurate to the best of my knowledge and understanding.



Signature

Matthew Carey

Print Name

F&B Director

Title

7/28/2024

Date



GAMING BEVERAGE LICENSE AMENDMENT APPLICATION FORM

REASON FOR FILING AMENDMENT REQUEST

NAME OF GAMING LICENSEE

Plainville Gaming and Redevelopment, LLC., d/b/a Plainridge Park Casino (PPC)

ADDRESS OF GAMING ESTABLISHMENT

Plainridge Park Casino
301 Washington Street,
Plainville, MA, 02762

NAME OF CONTACT INDIVIDUAL FOR PURPOSES OF THE PROCESS

Lisa McKenney, Compliance Mgr.

CONTACT INDIVIDUAL TELEPHONE NUMBER AND EMAIL ADDRESS

508-576-4409, (M) 860-235-3009, lisa.mckenney@pennetertainment.com

NAME AND LICENSE NUMBER OF LICENSED AREA YOU ARE REQUESTING TO AMEND

Racing Apron Outside Bar MGCGBL1-R3

REASON FOR FILING AMENDMENT REQUEST (PLEASE CHECK THE APPLICABLE BOX)

- | | |
|---|---|
| ☐ NEW LICENSED AREA | ☐ DESCRIPTION OF LICENSED AREA |
| ☐ CHANGE IN CAPACITY | ☐ ALCOHOL STORAGE |
| ☐ JOINTLY RESPONSIBLE PERSON | ☒ CHANGE OF HOURS |

FEE

The fee for an application to amend a gaming beverage license is \$100.00

LICENSED AREAS

A licensed area is a specific, limited, and defined space within a gaming establishment wherein the sale, distribution, or storage of alcoholic beverages to be drunk on the premises is permitted pursuant to a gaming beverage license. A licensed area amendment application must be submitted for each area of the gaming establishment that the gaming licensee desires to have designated as a licensed area and/or storage area.

A floor plan of the gaming establishment indicating the location of each licensed area identified below, and a diagram of each licensed area, must accompany the submission of this amendment application. If alcoholic beverages will be stored outside of a licensed area, storage areas must be identified on the floor plan.

IMPORTANT INFORMATION

The Massachusetts Public Records Law (Law), <http://www.sec.state.ma.us/pre/preidx.htm> found in Chapter 66, Section 10 of the Massachusetts General Laws, applies to records made or received by a Massachusetts governmental entity. Unless the requested records fall under an exemption to the Law, the responsive documents must be made available to the requester. A list of exemptions may be found in Chapter 4, Section 7(26) of the Massachusetts General Laws.

LICENSED AREA

NAME OF LICENSED AREA

Racing Apron Outside Bar

DESCRIPTION OF AMENDED LICENSED AREA

DESCRIPTION OF THE AMENDED LICENSED AREA INCLUDING BUT NOT LIMITED TO: BUSINESS CONCEPT, DESCRIPTION OF AREA INCLUDING WHETHER THE AREA IS CLOSED OR OPEN SPACE, NUMBER AND LOCATION OF ALCOHOLIC BEVERAGE DISPENSING AREAS, AND PLACEMENT OF EXITS.

(NOTE: A FLOOR PLAN OF THE LICENSED AREA DEPICTING THESE INDIVIDUAL ELEMENTS SHALL BE ATTACHED).

NUMBER AND/OR COLOR OF AREA ON FLOOR PLAN: #9 Racing Apron/Outside Bar, floor plan

The purpose of this amendment is to modify the approved hours of operation by extending the closing time from 1:00 a.m. to 2:00 a.m., while maintaining the current opening time of 8:00 a.m.

Racing Apron and Outside Bar is located in front of and to the side of the Live racing building. This area will be used any day during normal operating hours. We will use the outside bar to service the area. The existing fence separating the Concrete Patio and the dirt apron abutting the parking lot was made permanent and does not contain any exits.

There are 2 exits listed on the #9 Racing Apron/Outside Bar, floor plan in red.

Bottle service will not be available in this area.

HOURS OF OPERATION

8am to 2am

CAPACITY OF LICENSE AREA

963 occupants / 8000 sq ft

WILL YOU PROVIDE BOTTLE SERVICE? Yes ☐ No ☒ If Yes, PLEASE ELABORATE

ALCOHOL STORAGE

DESCRIBE THE MANNER IN WHICH ALCOHOLIC BEVERAGES WILL BE STORED AND SECURED WHEN LICENSED AREA IS NOT IN USE. (IF STORAGE AREA IS OUTSIDE OF LICENSED AREA, THIS STORAGE AREA SHALL BE DEPICTED ON THE FLOOR PLAN).

Alcohol will be brought out for event and then immediately removed after event has taken place. Alcohol may be secured in the outside bar behind locked doors.

NAME AND EMPLOYEE LICENSE/REGISTRATION NUMBER OF MANAGER OF LICENSED AREA

Matthew Carey- Food and Beverage Director- GKS23-0074

JOINTLY RESPONSIBLE PERSON

IDENTIFY THE JOINTLY RESPONSIBLE PERSON (IF ANY) FOR THE LICENSED AREA BY NAME, CONTACT INFORMATION, VENDOR LICENSE OR REGISTRATION NUMBER, AND ATTACH EVIDENCE THAT THE LICENSEE MAINTAINS AUTHORITY OVER THE JOINTLY RESPONSIBLE PERSON.

ATTESTATION

I, Matthew Carey, hereby affirm under the pains and penalties of perjury that the information contained in this application, including all attachments, is true and accurate to the best of my knowledge and understanding.


Signature

Matthew Carey
Print Name

F&B Director
Title

7/28/2026
Date



GAMING BEVERAGE LICENSE AMENDMENT APPLICATION FORM

REASON FOR FILING AMENDMENT REQUEST

NAME OF GAMING LICENSEE

Plainville Gaming and Redevelopment, LLC., d/b/a Plainridge Park Casino (PPC)

ADDRESS OF GAMING ESTABLISHMENT

Plainridge Park Casino
301 Washington Street,
Plainville, MA, 02762

NAME OF CONTACT INDIVIDUAL FOR PURPOSES OF THE PROCESS

Lisa McKenney, Compliance Mgr.

CONTACT INDIVIDUAL TELEPHONE NUMBER AND EMAIL ADDRESS

508-576-4409, (M) 860-235-3009, lisa.mckenney@pennetertainment.com

NAME AND LICENSE NUMBER OF LICENSED AREA YOU ARE REQUESTING TO AMEND

High Limit Lounge MGCGBL1-R3

REASON FOR FILING AMENDMENT REQUEST (PLEASE CHECK THE APPLICABLE BOX)

- | | |
|---|---|
| ☐ NEW LICENSED AREA | ☐ DESCRIPTION OF LICENSED AREA |
| ☐ CHANGE IN CAPACITY | ☐ ALCOHOL STORAGE |
| ☐ JOINTLY RESPONSIBLE PERSON | ☒ CHANGE OF HOURS |

FEE

The fee for an application to amend a gaming beverage license is \$100.00

LICENSED AREAS

A licensed area is a specific, limited, and defined space within a gaming establishment wherein the sale, distribution, or storage of alcoholic beverages to be drunk on the premises is permitted pursuant to a gaming beverage license. A licensed area amendment application must be submitted for each area of the gaming establishment that the gaming licensee desires to have designated as a licensed area and/or storage area.

A floor plan of the gaming establishment indicating the location of each licensed area identified below, and a diagram of each licensed area, must accompany the submission of this amendment application. If alcoholic beverages will be stored outside of a licensed area, storage areas must be identified on the floor plan.

IMPORTANT INFORMATION

The Massachusetts Public Records Law (Law), <http://www.sec.state.ma.us/pre/preidx.htm> found in Chapter 66, Section 10 of the Massachusetts General Laws, applies to records made or received by a Massachusetts governmental entity. Unless the requested records fall under an exemption to the Law, the responsive documents must be made available to the requester. A list of exemptions may be found in Chapter 4, Section 7(26) of the Massachusetts General Laws.

LICENSED AREA**NAME OF LICENSED AREA**

High Limit Lounge

DESCRIPTION OF AMENDED LICENSED AREA

DESCRIPTION OF THE AMENDED LICENSED AREA INCLUDING BUT NOT LIMITED TO: BUSINESS CONCEPT, DESCRIPTION OF AREA INCLUDING WHETHER THE AREA IS CLOSED OR OPEN SPACE, NUMBER AND LOCATION OF ALCOHOLIC BEVERAGE DISPENSING AREAS, AND PLACEMENT OF EXITS.

(NOTE: A FLOOR PLAN OF THE LICENSED AREA DEPICTING THESE INDIVIDUAL ELEMENTS SHALL BE ATTACHED).

NUMBER AND/OR COLOR OF AREA ON FLOOR PLAN: #10 Casino Gaming Floor & High Limit/VIP Lounge (Orange)

The purpose of this amendment is to modify the approved hours of operation by extending the closing time from 1:00 a.m. to 2:00 a.m., while maintaining the current opening time of 8:00 a.m.

The High Limit/VIP Lounge is highlighted in orange on the Casino Gaming Floor & High Limit/VIP Lounge floor plan. Beer, Wine and Liquor will be served from a portable bar, server, or bartender when business volume demands. The blue area next to the lounge will be used for alcohol storage, the door will be lockable. The High Limit/VIP Lounge will be used for our high valued players.

Bottle service will not be offered in this area.

HOURS OF OPERATION

8am to 2am

CAPACITY OF LICENSE AREA

18 Occupants / 590 sq ft

WILL YOU PROVIDE BOTTLE SERVICE? YES ☐ NO ☒ IF YES, PLEASE ELABORATE

ALCOHOL STORAGE

DESCRIBE THE MANNER IN WHICH ALCOHOLIC BEVERAGES WILL BE STORED AND SECURED WHEN LICENSED AREA IS NOT IN USE. (IF STORAGE AREA IS OUTSIDE OF LICENSED AREA, THIS STORAGE AREA SHALL BE DEPICTED ON THE FLOOR PLAN).

Alcohol will be brought to the venue when needed and will be secured in lockable coolers or the lockable back closet.

NAME AND EMPLOYEE LICENSE/REGISTRATION NUMBER OF MANAGER OF LICENSED AREA

Matthew Carey- Food and Beverage Director- GKS23-0074

JOINTLY RESPONSIBLE PERSON

IDENTIFY THE JOINTLY RESPONSIBLE PERSON (IF ANY) FOR THE LICENSED AREA BY NAME, CONTACT INFORMATION, VENDOR LICENSE OR REGISTRATION NUMBER, AND ATTACH EVIDENCE THAT THE LICENSEE MAINTAINS AUTHORITY OVER THE JOINTLY RESPONSIBLE PERSON.

ATTESTATION

I, Matthew Carey, hereby affirm under the pains and penalties of perjury that the information contained in this application, including all attachments, is true and accurate to the best of my knowledge and understanding.



Signature

Matthew Carey

Print Name

F&B Director

Title

7/08/2026

Date



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

FROM: Justin Stempeck, Chief Deputy General Counsel
Caitlin Monahan, Director of Investigations and Enforcement Bureau

DATE: August 18, 2026

RE: Transfer Regulation Revisions - 205 CMR 229.01 and 205 CMR 116.08

A. Introduction

The IEB recently conducted a review of the Commission's transfer of interest regulations in both the gaming and sports wagering areas and is recommending certain changes be made to the language to clarify an appropriate threshold for triggering the "transfer of interest" review process.

B. Sports Wagering Transfers of Interest

Under G.L. c. 23N, § 6(h):

No licensee shall transfer an operator license, or any direct or indirect interest in the license, without the majority approval of the commission. A person seeking to acquire such license through a transfer shall qualify and otherwise be determined by the commission to be eligible for licensure under this chapter. The commission may reject a proposed license transfer or a proposed transfer of interest in the license to an unsuitable person and may reject a proposed transfer that, in the determination of the commission, would be injurious to the interests of the commonwealth. **The commission may promulgate regulations governing this process** which may include assessment of a fee to reflect the cost associated with reviewing the proposed transfer. (emphasis added)

Under the Sports Wagering statute, the Commission has the authority to approve any "direct or indirect interest" in a sports wagering license. Additionally, the statute authorizes the Commission to promulgate regulations governing the process, which it did via 205 CMR 229.01(2)(a) which reads:

(2) Notwithstanding 205 CMR 229.01(1), **the following transactions shall not be considered transfers subject to M.G.L. c. 23N, § 6(h), and do not require prior notification to the Bureau:**

(a) The open market transfer of a publicly traded interest in a Sports Wagering Licensee, or holding, parent or intermediary company of a Sports Wagering Licensee where such transfer results in the transferee holding less than a 10% interest in the holding, parent or intermediary company.

(b) The granting of a security interest in return for financing to a bona fide banking institution, as defined in M.G.L. c. 167A, § 1, or a commercial financial institution as defined in M.G.L. c. 63, § 1, so long as the bona fide banking institution or the commercial financial institution does not, by virtue of its security interest, possess the intention to influence or affect the affairs or operations of a Sports Wagering Licensee or applicant or Qualifier for a Sports Wagering Licensee. The Sports Wagering Licensee, applicant, or Qualifier shall however, provide notice of the transaction promptly to the Bureau upon its consummation.

Critically, the Commission carved out the formal approval of certain transfers when they were below 10% interest in a publicly traded entity or where the transfer involved institutional investors. However, the regulation as currently written can be read as requiring that the Commission engage in a transfer of interest analysis/process any time 1) a non publicly traded interest, of any amount, is transferred; and 2) a publicly traded interest of 10% or more is transferred. This applies even where a transferee is already qualified.

By way of the proposed amendment below, the IEB is now suggesting that the 10% interest threshold be raised to 20% and that a similar provision be added to the regulation to remove the transfer of privately held interests from the definition of “transfer” as well. The IEB makes this recommendation where both the Securities’ and Exchange Commission as well as generally accepted accounting principles¹ acknowledge that investment less than 20% indicates that the investing individual/entity lacks “significant influence” over the company.²

The proposed changes to 205 CMR 229.01(2) would read:

(2) Notwithstanding 205 CMR 229.01(1), the following transactions shall not be considered transfers subject to M.G.L. c. 23N, § 6(h), and do not require prior notification to the Bureau:

¹ “An investment (direct or indirect) of 20 percent or more of the voting stock of an investee shall lead to a presumption that in the absence of predominant evidence to the contrary an investor has the ability to exercise significant influence over an investee. Conversely, an investment of less than 20 percent of the voting stock of an investee shall lead to a presumption that an investor does not have the ability to exercise significant influence unless such ability can be demonstrated.” FASB ASC Topic 323-10-15-8.

² Similarly, the SEC schedule 13D framework establishes 20% ownership as the ceiling for filing as a passive investor.

- (a) The open market transfer of a publicly traded interest in a Sports Wagering Licensee, or holding, parent or intermediary company of a Sports Wagering Licensee where such transfer results in the transferee holding less than a ~~4~~20% interest in the holding, parent or intermediary company.
- (b) The transfer of a privately held interest in a Sports Wagering License, or holding, parent or intermediary company of a Sports Wagering Licensee where such transfer results in the transferee holding less than a 20% interest in the holding, parent or intermediary company.
- (~~b~~c) The granting of a security interest in return for financing to a bona fide banking institution, as defined in [M.G.L. c. 167A, § 1](#), or a commercial financial institution as defined in [M.G.L. c. 63, § 1](#), so long as the *bona fide* banking institution or the commercial financial institution does not, by virtue of its security interest, possess the intention to influence or affect the affairs or operations of a Sports Wagering Licensee or applicant or Qualifier for a Sports Wagering Licensee. The Sports Wagering Licensee, applicant, or Qualifier shall however, provide notice of the transaction promptly to the Bureau upon its consummation.

C. Gaming Transfer of Interest

Under G.L. c. 23K § 21(b):

(b) No person shall transfer a gaming license, a direct or indirect real interest, structure, real property, premises, facility, personal interest or pecuniary interest under a gaming license issued under this chapter or enter into an option contract, management contract or other agreement or contract providing for such transfer in the present or future, without the notification to, and approval by, the commission. **The commission may promulgate rules and regulations that create exemptions from the approval requirement;** provided, however, that: (i) in no event shall a bona fide banking institution, as defined in section 1 of chapter 167A, or a commercial financial institution which becomes a substantial party of interest with a gaming licensee be considered a transferee; (ii) the commission may require the transferor, transferee or both to pay to the commission an amount representing the commonwealth's share of the increased value for the transferred licenses, property or interest; provided further, that the commission shall consider as a factor in determining the amount of the payment the market value of the gaming license, property or interest when it was acquired and at the time of the transfer; provided further, that the commission may place additional conditions or restrictions on a transfer that the commission considers suitable; and provided further, that the commission may reject a transfer if the commission considers the transfer unsuitable; and (iii) any payments collected by the commission on behalf of the commonwealth based on the transfer shall be deposited in the same manner as license fees are deposited. (emphasis added)

Under the gaming statute, the Commission has the authority to approve any transfer of a “direct or indirect interest” in a gaming license. Additionally, the statute authorizes the Commission to promulgate regulations to create exemptions from the transfer approval requirement. The

Commission's current regulation on transfers of interest only speaks to "notification" exemptions when the statute authorizes the Commission to exempt approved categories from the "approval requirement" fully.

The current regulation at 205 CMR 116.08(2)(a) reads:

(2) Notwithstanding 205 CMR 116.08(1), the following transfers **do not require prior notification** to the bureau:

(a) The open market transfer of a publicly traded interest in a gaming licensee, or holding, parent or intermediary company of a gaming licensee where such transfer results in the transferee holding less than a 5% interest in the holding, parent or intermediary company.

(b) The granting of a security interest in return for financing to a bona fide banking institution, as defined in M.G.L. c. 167A, § 1, or a commercial financial institution as defined in M.G.L. c. 63, § 1, so long as the bona fide banking institution or the commercial financial institution does not, by virtue of its security interest, possess the ability or intention to influence or affect the affairs or operations of a gaming licensee or applicant or qualifier for a gaming license. The gaming licensee, applicant, or qualifier shall at a minimum, however, provide notice of the transaction promptly to the bureau upon its consummation.

For the same rationale as outlined above with respect to the proposed changes to the sports wagering transfer regulations, the IEB is recommending a change to the gaming transfer regulations to exempt public or private transfer of less than 20% from the prior notification and approval requirements set forth in the statute. Notably, entities would still need to notify the Bureau of the transfer, but the notice would not need to precede the transfer or wait on a formal approval process.

The updated regulation language would read:

(2) Notwithstanding 205 CMR 116.08(1), the following ~~transfers~~ **transactions shall not be considered transfers subject to M.G.L. c. 23K, § 21(b) and** do not require prior notification to the bureau:

(a) The open market transfer of a publicly traded interest in a gaming licensee, or holding, parent or intermediary company of a gaming licensee where such transfer results in the transferee holding less than a ~~5~~**20**% interest in the holding, parent or intermediary company.

(b) **The transfer of a privately held interest in a Gaming License, or holding, parent or intermediary company of a Gaming Licensee where such transfer results in the transferee holding less than a 20% interest in the holding, parent or intermediary company**

(b)(c) The granting of a security interest in return for financing to a bona fide banking institution, as defined in M.G.L. c. 167A, § 1, or a commercial financial institution as defined in M.G.L. c. 63, § 1, so long as the bona fide banking institution or the commercial financial institution does not, by virtue of its security interest, possess the ability or intention to influence or affect the affairs or operations of a gaming licensee or applicant or qualifier for a gaming license. The gaming licensee, applicant, or qualifier shall at a minimum, however, provide notice of the transaction promptly to the bureau upon its consummation.

Code of Massachusetts Regulations

Title 205: Massachusetts Gaming Commission

Chapter 116.00: Persons Required to be Licensed or Qualified (Refs & Annos)

205 CMR 116.08

116.08: Notice

Currentness

(1) No person shall transfer, or enter into an agreement to transfer, a gaming license, a direct or indirect interest in the gaming license, or a gaming establishment including the structure, real property, premises, facility, personal interest or pecuniary interest under a gaming license or enter into an option contract, management contract or other agreement or contract providing for such transfer in the present or future, or enter into an agreement granting the retention of a security interest in property delivered to the gaming licensee without prior notification to the bureau.

(2) Notwithstanding 205 CMR 116.08(1), the following ~~transfers~~ transactions shall not be considered transfers subject to M.G.L. c. 23K § 21(b) and do not require prior notification to the bureau:

- (a) The open market transfer of a publicly traded interest in a gaming licensee, or holding, parent or intermediary company of a gaming licensee where such transfer results in the transferee holding less than a ~~5~~20% interest in the holding, parent or intermediary company.
- (b) The transfer of a privately held interest in a Gaming License, or holding, parent or intermediary company of a Gaming Licensee where such transfer results in the transferee holding less than a 20% interest in the holding, parent or intermediary company
- (~~b~~c) The granting of a security interest in return for financing to a *bona fide* banking institution, as defined in M.G.L. c. 167A, § 1, or a commercial financial institution as defined in M.G.L. c. 63, § 1, so long as the *bona fide* banking institution or the commercial financial institution does not, by virtue of its security interest, possess the ability or intention to influence or affect the affairs or operations of a gaming licensee or applicant or qualifier for a gaming license. The gaming licensee, applicant, or qualifier shall at a minimum, however, provide notice of the transaction promptly to the bureau upon its consummation.

The Massachusetts Administrative Code titles are current through Register No. 1577, dated July 3, 2026. Some sections may be more current; see credits for details.

Mass. Regs. Code tit. 205, § 116.08, 205 MA ADC 116.08

End of Document

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SMALL BUSINESS IMPACT STATEMENT

The Massachusetts Gaming Commission (“Commission”) hereby files this Small Business Impact Statement in accordance with G.L. c. 30A, §2, relative to the proposed amendments to **205 CMR 116 Persons Required to be Licensed or Qualified**, specifically 205 CMR 116.08(2): Notice.

This regulation was promulgated as part of the process of promulgating regulations governing sports wagering in the Commonwealth, and is authorized by G.L. c. 23N, § 4. This regulation governs the notification of certain transfers of interest to the Commission and 205 CMR 116.08(2) specifically details which transfers must provide notice to the Commission.

This regulation is unlikely to have an impact on small businesses as it governs the behavior of Sports Wagering Operators who are not small businesses. Under G.L. c.30A, § 2, the Commission offers the following responses to the statutory questions:

1. Estimate of the number of small businesses subject to the proposed regulation:

This regulation is unlikely to have an impact on small businesses.

2. State the projected reporting, recordkeeping, and other administrative costs required for compliance with the proposed regulation:

There are no projected reporting, recordkeeping, or other administrative costs required for small businesses to comply with this regulation.

3. State the appropriateness of performance standards versus design standards:

No standards applicable to small businesses are set forth. Provided standards are performance standards.

4. Identify regulations of the promulgating agency, or of another agency or department of the Commonwealth, which may duplicate or conflict with the proposed regulation:

There are no conflicting regulations in 205 CMR, and the Commission is unaware of any conflicting or duplicating regulations of any other agency or department of the Commonwealth.

5. State whether the proposed regulation is likely to deter or encourage the formation of new businesses in the Commonwealth:



Massachusetts Gaming Commission

This amendment is unlikely to have any impact on the formation of new businesses in the Commonwealth.

Massachusetts Gaming Commission
By:

/s/ Justin Stempeck
Justin Stempeck, Chief Deputy General Counsel

Dated: August 6, 2026



Massachusetts Gaming Commission

101 Federal Street, 12th Floor, Boston, Massachusetts 02110 | TEL 617.979.8400 | FAX 617.725.0258 | www.massgaming.com

Code of Massachusetts Regulations

Title 205: Massachusetts Gaming Commission

Chapter 229.00: Review of a Proposed Transfer of Interests (Refs & Annos)

205 CMR 229.01

229.01: Notice

Effective: April 14, 2023

[Currentness](#)

(1) Pursuant to [M.G.L. c. 23N, § 6\(h\)](#), no person shall transfer, or enter into an agreement to transfer, a Sports Wagering License, or a direct or indirect interest in such a license, or a personal or pecuniary interest in such a license, or enter into an option contract, management contract or other agreement or contract providing for such transfer in the present or future, or enter into an agreement granting the retention of a security interest in property delivered to the Sports Wagering Licensee without prior notification to the Bureau.

(2) Notwithstanding 205 CMR 229.01(1), the following transactions shall not be considered transfers subject to [M.G.L. c. 23N, § 6\(h\)](#), and do not require prior notification to the Bureau:

(a) The open market transfer of a publicly traded interest in a Sports Wagering Licensee, or holding, parent or intermediary company of a Sports Wagering Licensee where such transfer results in the transferee holding less than a ~~±~~20% interest in the holding, parent or intermediary company.

(b) The transfer of a privately held interest in a Sports Wagering License, or holding, parent or intermediary company of a Sports Wagering Licensee where such transfer results in the transferee holding less than a 20% interest in the holding, parent or intermediary company.

(~~b~~c) The granting of a security interest in return for financing to a bona fide banking institution, as defined in [M.G.L. c. 167A, § 1](#), or a commercial financial institution as defined in [M.G.L. c. 63, § 1](#), so long as the *bona fide* banking institution or the commercial financial institution does not, by virtue of its security interest, possess the intention to influence or affect the affairs or operations of a Sports Wagering Licensee or applicant or Qualifier for a Sports Wagering Licensee. The Sports Wagering Licensee, applicant, or Qualifier shall however, provide notice of the transaction promptly to the Bureau upon its consummation.

Credits

History: [1489 Mass. Reg. 47](#), (emergency) eff. Jan. 25, 2023; [1493 Mass. Reg. 51](#), amended eff. Apr. 14, 2023.

The Massachusetts Administrative Code titles are current through Register No. 1566, dated January 30, 2026. Some sections may be more current; see credits for details.

Mass. Regs. Code tit. 205, § 229.01, 205 MA ADC 229.01

End of Document

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Code of Massachusetts Regulations

Title 205: Massachusetts Gaming Commission

Chapter 229.00: Review of a Proposed Transfer of Interests (Refs & Annos)

205 CMR 229.02

229.02: Approval

Effective: April 14, 2023

[Currentness](#)

(1) Any transfer subject to [M.G.L. c. 23N, § 6\(h\)](#) that does not result in a new qualifier being designated in accordance with [205 CMR 215.02: Persons Required to Be Qualified](#) may be approved by the Commission in a public meeting.

(2) Any transfer subject to [M.G.L. c. 23N, § 6\(h\)](#) that results in a new qualifier being designated in accordance with [205 CMR 215.02: Persons Required to Be Qualified](#) must be approved by the Commission. Said approval shall be subject to the provisions of [205 CMR 229.04](#). Both the transferor and transferee shall be jointly and severally responsible for the payment of the investigatory and other fees provided for in [205 CMR 214.02\(2\)](#).

(3) The Commission may reject any transfer requiring approval pursuant to [205 CMR 229.01\(1\)](#) that it finds would be injurious to the interests of the Commonwealth of Massachusetts. Without implied limitation, a transfer may be considered injurious to the interests of the Commonwealth if the Commission determines that the proposed transferee does not satisfy the applicable considerations set forth in [M.G.L. c. 23N, §§ 5, 6, or 9\(a\)](#); [205 CMR 215.00: Applicant and Qualifier Suitability Determination, Standards, and Procedures](#); or any other applicable provisions of M.G.L. chs. 23K, 23N or 205 CMR, or if the transferee does not satisfy the provisions of [205 CMR 229.04](#).

(4) The Commission shall not approve the transfer of a Sports Wagering License for one year after the initial issuance of the license unless one of the following has occurred:

(a) the parent, holding company, or intermediary company of the Sports Wagering Licensee experiences a change in ownership resulting in a change of control;

(b) the Sports Wagering Licensee fails to maintain suitability; or

(c) the Commission determines that other circumstances exist which affect the Sports Wagering Licensee's ability to operate the Sports Wagering Platform successfully.

(5) Limitations on Certain Transfers.

(a) The Commission shall not approve of any transfer that would result in:

1. a Category 1 Operator holding more than one Category 1 License or more than two Tethered Category 3 Licenses;
or
2. a Category 2 Operator holding a Category 1 License, more than one Category 2 License, or more than one Tethered Category 3 License.

(b) A Category 1 Sports Wagering License may only be transferred in connection with:

1. the transfer of the licensee's gaming license issued under M.G.L. c. 23K; and
2. the transfer of any Tethered Category 3 Licenses connected to the Category 1 Sports Wagering License to be transferred.

(c) A Category 2 Sports Wagering License may only be transferred in connection with:

1. the transfer of the licensee's license under Chapter 128A to conduct a live horse racing meeting, or rights as authorized by applicable law to conduct simulcast wagering; and
2. the transfer of any Tethered Category 3 License connected to the Category 2 Sports Wagering License to be transferred.

Credits

History: [1489 Mass. Reg. 47](#), (emergency) eff. Jan. 25, 2023; [1493 Mass. Reg. 51](#), amended eff. Apr. 14, 2023.

The Massachusetts Administrative Code titles are current through Register No. 1566, dated January 30, 2026. Some sections may be more current; see credits for details.

Mass. Regs. Code tit. 205, § 229.02, 205 MA ADC 229.02

End of Document

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Code of Massachusetts Regulations

Title 205: Massachusetts Gaming Commission

Chapter 229.00: Review of a Proposed Transfer of Interests (Refs & Annos)

205 CMR 229.03

229.03: Interim Authorization

Effective: April 14, 2023

[Currentness](#)

(1) Contractual Transfers. Whenever any person contracts to transfer a Sports Wagering License or an ownership interest in a Sports Wagering Licensee or its parent, holding or intermediary company, or any property relating to a sports wagering operation, under circumstances which require that the transferee obtain licensure or be found qualified pursuant to 205 CMR 215.00: *Applicant and Qualifier Suitability Determination, Standards, and Procedures* and/or M.G.L. c. 23N, the contract shall not specify a closing or settlement date which is earlier than 121 days after the submission of a completed transfer application. Said application shall consist of:

- (a) For the transferee, the survey described at [205 CMR 211.01\(1\)\(a\)](#);
- (b) For the transferee and each new qualifier, the materials described at [205 CMR 211.01\(1\)\(c\) through \(e\)](#), as appropriate;
- (c) For the transferee and each new qualifier, any attestation forms required by the Bureau;
- (d) A fully executed trust agreement in accordance with 205 CMR 229.03(6) which shall be subject to Commission approval. Any contract provision which specifies a closing or settlement date sooner than 121 days after submission of the transfer application shall be void for all purposes.

(2) Transfers of Publicly Traded Securities. Whenever any Person, as a result of a transfer of publicly traded securities of a Sports Wagering Licensee or its parent, holding or intermediary company, is required to be qualified under [205 CMR 215.02: Persons Required to Be Qualified](#) and/or M.G.L. c. 23N, the Person including all related qualifiers shall, within 30 days after a Schedule 13D or 13G is filed with the U.S. Securities and Exchange Commission, or after the Bureau notifies the Person that qualification is required, or within such additional time as the Bureau may for good cause allow, file a completed transfer application as described in 205 CMR 229.03(1). No extension of the time for filing a completed transfer application shall be granted unless the Person submits a written acknowledgement recognizing the jurisdiction of the commission and the obligations imposed by M.G.L. c. 23N and 205 CMR. If a proposed transferee, including all related qualifiers, fails to timely file a complete transfer application, such failure shall constitute a per se negative finding of suitability to continue to act as a security holder, and the Commission shall take appropriate action including requiring divestiture by the transferee or redemption of the securities by the transferor.

(3) If a prospective transferee files a complete transfer application in a timely manner the Commission shall hold a hearing in accordance with [205 CMR 101.01\(2\)\(d\)](#) and render a decision on the interim authorization of the proposed transferee within 120 days after such filing or, if it is a contractual transfer, prior to the proposed closing or settlement date. If interim authorization is approved for a transfer governed by 205 CMR 229.03(1) then the closing or settlement may occur, and the prospective transferee may hold the securities or interests subject to the provisions of 205 CMR 229.03(4) until a final determination of suitability is made by the commission. If interim authorization is approved for a transfer governed by 205 CMR 229.03(2) then the prospective transferee may continue to hold the securities or interests subject to the provisions of 205 CMR 229.03(4) until a final determination of suitability is made by the Commission.

(4) If, after a hearing, the Commission denies interim authorization, there shall be no closing or settlement of a contract to transfer an interest governed by 205 CMR 229.03(1) until the Commission makes a final determination on the suitability of the transferee in accordance with [205 CMR 215.01\(1\)](#). If the Commission denies interim authorization for a proposed transfer subject to 205 CMR 229.03(2), all securities and interests subject to the transfer shall be promptly transferred into the trust. If the commission grants interim authorization for any transfer, it may at any time thereafter order all securities and interests subject to the transfer transferred into the trust if it finds reasonable cause to believe that the proposed transferee may be found unsuitable. If a prospective transferee fails or refuses to timely transfer securities and interests into the trust upon direction from the Commission said transferee shall be issued a negative determination of suitability.

(5) After determining that a person is required to be qualified in accordance with [205 CMR 215.02: Persons Required to Be Qualified](#), the Bureau shall commence an investigation into the suitability of the transferee, which may be limited to a review of the information required to be reviewed in an investigation undertaken in accordance with [205 CMR 215.01\(2\)\(b\)](#). The Bureau shall produce and forward to the Commission an interim authorization report no later than 90 days after the date that a complete transfer application is submitted by the proposed transferee. The commission may approve interim authorization if it finds that:

(a) The transferee has submitted a complete transfer application;

(b) The transferee has submitted a fully executed trust agreement in accordance with 205 CMR 229.03(6);

(c) The trustee or trustees required under 205 CMR 229.03(6) have satisfied the qualification criteria applicable to qualifiers;

(d) There is no preliminary evidence of anything that would serve to disqualify the transferee from licensure in accordance with M.G.L. c. 23N, [M.G.L. c. 23N, §§ 5, 6, and/or 9\(a\)](#) or 205 CMR 215.00: *Applicant and Qualifier Suitability Determination, Standards, and Procedures*, nor is there any other reason known at the time why a positive determination of suitability may not ultimately be achieved;

(e) The transfer would not violate [205 CMR 229.02\(3\) or \(4\)](#);

(f) It is in the best interests of the Commonwealth for the Sports Wagering Operation to continue to operate pursuant to interim authorization; and

(g) If the transfer will result in a change of control, the transferee has agreed in writing in accordance with [205 CMR 229.04](#) to comply with all of the transferor's existing license obligations or has otherwise petitioned the Commission for modification or elimination of one or more of those obligations.

If the Commission approves interim authorization, during the period of interim authorization, the Bureau shall continue its suitability investigation as may be necessary for a determination of the suitability of the person granted interim authorization. Within nine months after the interim authorization decision, which period may be extended by the Commission for one three-month period, the Commission shall hold a hearing and render a determination on the suitability of the applicant in accordance with [205 CMR 215.01\(1\)](#).

(6) Trust Agreements. A trust agreement required to be submitted with a transfer application in accordance with 205 CMR 229.03(1) and (2) shall be fully executed upon submission and contain, at a minimum, the following:

(a) A provision for the transfer and conveyance to the trustee of all of the transferee's proposed present and future right, title and interest in the sports wagering licensee, or its parent, holding or intermediary company, including all voting rights in securities upon the occurrence of an event described in 205 CMR 229.033(4) or if otherwise directed to do so by the Bureau in its discretion, pending a final suitability determination by the Commission.

(b) A provision consistent with the provisions of 205 CMR 229.03 for the distribution of any trust res upon a positive determination of suitability, negative determination of suitability, or at the direction of the Commission in accordance with 205 CMR 229.03(8).

(c) A provision identifying the trustee(s) and requiring the trustee to timely submit the materials described in [205 CMR 211.01\(1\)\(c\) through \(f\)](#), as applicable, in order to be found qualified by the Commission in accordance with [205 CMR 215.01\(1\)](#).

(d) A provision identifying the compensation for the service, costs and expenses of the trustee(s), which shall be made subject to the approval of the Commission.

(e) A mechanism by which the trustee may effectuate divestiture or redemption of securities, or a like process, in the event of a negative determination of suitability being issued to the transferee.

(f) Any additional provisions the Commission deems necessary and desirable.

(7) The trustee of the trust shall exercise all rights incident to the ownership of the property subject to the trust, and shall be vested with all powers, authority and duties necessary to the unencumbered exercise of such right, and the transferee shall have no right to participate in the earnings of the Sports Wagering Licensee or receive any return on its investment or debt security holdings during the time the securities or interest are in the trust. Earnings may, however, accrue to or into the trust.

(8) The trust agreement shall remain operative until the Commission issues the transferee a positive determination of suitability in accordance with [205 CMR 215.01\(1\)\(e\)](#) (and in the event the interest has been placed into the trust, the trustee distributes the trust res) or the Commission issues the transferee a negative finding of suitability and the trust res is disposed of in accordance with 205 CMR 229.03(9). The trust shall otherwise only be revocable prior to a determination of suitability being issued upon Commission approval at the request of the settlor. In the event of such a request the Commission may direct the trustee to dispose of the trust res in accordance with 205 CMR 229.03(9).

(9) If the Commission issues a negative determination of suitability in accordance with [205 CMR 215.01\(1\)\(e\)1.](#), a contract for the transfer of interests shall thereby be terminated for all purposes without liability on the part of the transferor. In the event of such negative determination, where the subject interests have been transferred into a trust in accordance with 205 CMR 229.03(4), the trustee shall endeavor and be authorized to attempt to sell, assign, convey or otherwise dispose of all trust res in accordance with the means established in accordance with 205 CMR 229.03(6)(e) or as otherwise directed by the commission. Any subsequent transferee must be appropriately licensed or qualified in accordance with 205 CMR 229.00. The disposition of trust res by the trustee shall be completed within 120 days of the denial of qualification, or within such additional time as the Commission may for good cause allow. The proceeds of such disposition shall be distributed to the unsuitable transferee only in an amount not to exceed the lower of the actual cost of the assets to such unsuitable transferee, or the value of such assets calculated as if the investment had been made on the date the assets were transferred into the trust, and any excess remaining proceeds shall be paid to the Massachusetts Sports Wagering Control Fund in accordance with [M.G.L. c. 23N, § 15](#).

Credits

History: [1489 Mass. Reg. 47](#), (emergency) eff. Jan. 25, 2023; [1493 Mass. Reg. 51](#), amended eff. Apr. 14, 2023.

The Massachusetts Administrative Code titles are current through Register No. 1566, dated January 30, 2026. Some sections may be more current; see credits for details.

Mass. Regs. Code tit. 205, § 229.03, 205 MA ADC 229.03

End of Document

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Code of Massachusetts Regulations

Title 205: Massachusetts Gaming Commission

Chapter 229.00: Review of a Proposed Transfer of Interests (Refs & Annos)

205 CMR 229.04

229.04: Review of a Proposed Transfer of Interests

Effective: April 14, 2023

[Currentness](#)

(1) If a proposed transfer of interests subject to 205 CMR 229.00 will result in a change of control as defined in [205 CMR 102.02: Definitions](#), the proposed transferee shall, as a condition of the transfer, unless otherwise allowed by the Commission in accordance with [205 CMR 229.01\(2\)](#), provide the Commission with a written agreement to assume all obligations of the Sports Wagering Licensee including, but not limited to, commitments made in the Sports Wagering License Application, all terms and conditions contained in the Sports Wagering License, Operation Certificate, and all permits, licenses, and other approvals issued by any federal, state, and local governmental agencies. Additionally, the written agreement shall include an attestation from the transferor and transferee, accompanied by relevant supporting documentation, that said transfer comports with all applicable terms and conditions of the aforementioned instruments.

(2) Prior to submitting the written agreement referenced in 205 CMR 229.04(1), a proposed transferee may petition the Commission to allow for the modification of any terms, conditions, or agreements applicable to the Sports Wagering License or Operation Certificate held by the transferor, provided that the modifications are not inconsistent with any applicable provisions of M.G.L. c. 23N and 205 CMR.

(3) Notwithstanding 205 CMR 229.04(1):

(a) The Commission may in its discretion require submission of any additional application material as described in 205 CMR 211.00: *Category 1, Category 2, and Category 3 Sports Wagering License Applications*, 215.00: *Applicant and Qualifier Suitability Determination, Standards, and Procedures*, or 218.00: *General Sports Wagering Application Requirements, Standards, and Procedures* to assist in its determination as to whether to allow a modification in accordance with 205 CMR 229.04(2) and/or approve a transfer of interests in accordance with [205 CMR 229.02](#).

(b) A proposed transferee shall have the same duty to cooperate with such requests for information as does an Applicant under [205 CMR 212.01: Additional Information and Cooperation](#).

Credits

History: [1489 Mass. Reg. 47](#), (emergency) eff. Jan. 25, 2023; [1493 Mass. Reg. 51](#), amended eff. Apr. 14, 2023.

The Massachusetts Administrative Code titles are current through Register No. 1566, dated January 30, 2026. Some sections may be more current; see credits for details.

Mass. Regs. Code tit. 205, § 229.04, 205 MA ADC 229.04

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Code of Massachusetts Regulations

Title 205: Massachusetts Gaming Commission

Chapter 229.00: Review of a Proposed Transfer of Interests (Refs & Annos)

205 CMR 229.05

229.05: Fees for Review of Transfer

Effective: April 14, 2023

[Currentness](#)

- (1) Pursuant to [M.G.L. c. 23N, § 6\(h\)](#), the transferor shall be responsible for paying to the Commission all costs incurred by the Commission, directly or indirectly, for reviewing any transfer that requires prior notification to the Bureau.
- (2) For purposes of 205 CMR 229.05, the costs associated with reviewing the transfer shall include, without limitation:
- (a) All costs for conducting an investigation into any new qualifiers, the transferee, the trustee, and any other person subject to the jurisdiction of the Commission under M.G.L. c. 23N relating to the transfer in question; and
 - (b) All fees for services, disbursements, out of pocket costs, allocated overhead, processing charges, administrative expenses, professional fees, and other costs directly or indirectly incurred by the Commission, including without limitation all such amounts incurred by the Commission to and through the Bureau, the Division, the Gaming Enforcement Unit, the Gaming Liquor Enforcement Unit, and any contract investigator.
- (3) If, pursuant to [205 CMR 214.02\(3\)](#), the Commission establishes a schedule of fees, wages, and other charges for the cost of investigating applicants, said schedule shall also govern the assessment of costs under this 205 CMR 229.05.
- (4) The Commission shall assess to the transferor all other costs paid by or for the Commission, directly or indirectly, to any other Person for conducting an investigation into a transferor plus an appropriate percent for overhead, processing and administrative expenses.
- (5) Other Requirements for Review Fees.
- (a) All required review fees pursuant to 205 CMR 229.05 shall be non-refundable, due and payable notwithstanding the withdrawal, abandonment, or denial of any transfer application.

(b) The transferor and the transferee shall be jointly and severally liable for any amounts chargeable to the transferor pursuant to 205 CMR 229.05.

(c) All fees in 205 CMR 229.05 shall be deposited into the Sports Wagering Control Fund established in [M.G.L. c. 23N, § 15](#).

Credits

History: [1489 Mass. Reg. 47](#), (emergency) eff. Jan. 25, 2023; [1493 Mass. Reg. 51](#), amended eff. Apr. 14, 2023.

The Massachusetts Administrative Code titles are current through Register No. 1566, dated January 30, 2026. Some sections may be more current; see credits for details.

Mass. Regs. Code tit. 205, § 229.05, 205 MA ADC 229.05

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SMALL BUSINESS IMPACT STATEMENT

The Massachusetts Gaming Commission (“Commission”) hereby files this Small Business Impact Statement in accordance with G.L. c. 30A, §2, relative to the proposed amendments to **205 CMR 229 REVIEW OF A PROPOSED TRANSFER OF INTERESTS**, specifically 205 CMR 229.01(2): Notice.

This regulation was promulgated as part of the process of promulgating regulations governing sports wagering in the Commonwealth, and is authorized by G.L. c. 23N, § 4. This regulation governs the notification of certain transfers of interest to the Commission and 205 CMR 229.01(2) specifically details which transfers must provide notice to the Commission.

This regulation is unlikely to have an impact on small businesses as it governs the behavior of Sports Wagering Operators who are not small businesses. Under G.L. c.30A, § 2, the Commission offers the following responses to the statutory questions:

1. Estimate of the number of small businesses subject to the proposed regulation:

This regulation is unlikely to have an impact on small businesses.

2. State the projected reporting, recordkeeping, and other administrative costs required for compliance with the proposed regulation:

There are no projected reporting, recordkeeping, or other administrative costs required for small businesses to comply with this regulation.

3. State the appropriateness of performance standards versus design standards:

No standards applicable to small businesses are set forth. Provided standards are performance standards.

4. Identify regulations of the promulgating agency, or of another agency or department of the Commonwealth, which may duplicate or conflict with the proposed regulation:

There are no conflicting regulations in 205 CMR, and the Commission is unaware of any conflicting or duplicating regulations of any other agency or department of the Commonwealth.

5. State whether the proposed regulation is likely to deter or encourage the formation of new businesses in the Commonwealth:



Massachusetts Gaming Commission

This amendment is unlikely to have any impact on the formation of new businesses in the Commonwealth.

Massachusetts Gaming Commission
By:

/s/ Justin Stempeck
Justin Stempeck, Chief Deputy General Counsel

Dated: August 6, 2026



Massachusetts Gaming Commission

101 Federal Street, 12th Floor, Boston, Massachusetts 02110 | TEL 617.979.8400 | FAX 617.725.0258 | www.massgaming.com



Legal Division

TO: Jordan Maynard, Chairman
Eileen O'Brien, Commissioner
Bradford Hill, Commissioner
Nakisha Skinner, Commissioner
Paul Brodeur, Commissioner

FROM: Jenna Hentoff, Deputy General Counsel
Judith A. Young, Senior Associate General Counsel
Burke Cain, Chief, Gaming Agents Division,
Dave Diorio Assistant Chief, Gaming Agents Division/ Casino Compliance Coordinator

CC: Kevin Scanlon, General Counsel

RE: Finalization of 205 CMR 146.18 - *Baccarat, Mini-baccarat, Midi-baccarat, and Baccarat-chemin de Fer Tables; Physical Characteristics*

DATE: August 27, 2026

Overview:

Code of Massachusetts Regulations (“CMR”) Chapter 146.00: *Gaming Equipment* sets out the equipment necessary to conduct table games at the two Category 1 gaming establishments within the Commonwealth. Sections of the regulation prescribe the requisite chips, dice, displays (placards), shufflers, and physical layouts for common table games and game variations including but not limited to, Blackjack, Roulette, Poker and Baccarat.

205 CMR 146.18: *Baccarat, Midi-baccarat, Mini-baccarat, and Baccarat-chemin de Fer Tables; Physical Characteristics*, was approved for promulgation by the Commission on July 1, 2026. These proposed amendments came in conjunction with the request for a new Baccarat variation, specifically of Midi and Mini Baccarat. No comments were received for this regulation during the public comment period, or at the hearing held on August 18, 2026. The Legal Division is not proposing any additional changes beyond the proposed amendments presented at the July 1, 2026, public meeting.

Proposed Amendments:

The Legal Division has proposed the following changes to 205 CMR 146.18:

- **Additional references for clarity in subsections (3), (4), (6) and (7):**
 - Additional references to Midi-Baccarat and/or Mini-Baccarat in sections that had only a general reference to Baccarat, or only one form of the authorized game.
- **Removal of existing provisions within subsection (4)(g), (h) and (i):**
 - More specific references to game variations and optional bonus wagers with specific names have been struck from the regulation. These references will appear within the Authorized Rules of Baccarat, Mini-Baccarat and Midi-Baccarat.
- **Creation of a new provision within subsection 4(g):**



Massachusetts Gaming Commission

(g) If a gaming licensee offers one or more additional wagers or a no vigorish version of baccarat, midi-baccarat, or mini-baccarat that permits additional wagers pursuant to the authorized Rules of the Game of Baccarat, Midi-Baccarat, or Mini Baccarat:

1. Areas at each player position designated for the placement of the additional wager or wagers in accordance with the authorized Rules of the Game of Baccarat, Midi-baccarat or Mini-baccarat; and

2. An inscription identifying the payout odds for the additional wager or wagers unless the gaming licensee chooses to comply with 205 CMR 146.18(7).

– **Removal of subsections (8) and (9):**

- Subsections (8) and (9) have been removed in favor of a single provision in subsection (7) which includes the requirement for payout odds signage should such information not be inscribed on the layout for any additional wagers permitted pursuant to the authorized Rules.

Conclusion:

An Amended Small Business Impact Statement and the proposed final draft of the regulation are included in the Commissioners' packet. With the Commission's vote to finalize the proposed amendments to 205 CMR 146.18, staff will file the regulations with the Regulations Division; and the regulation will take effect on September 11, 2026. Members of the Gaming Agents Division and Legal Division are also present if the Commissioners have any questions.



Massachusetts Gaming Commission

146.18: Baccarat, Midi-baccarat, Mini-baccarat, and Baccarat-chemin de Fer Tables; Physical Characteristics

- (1) Baccarat shall be played on a table having numbered player positions for no more than 14 players.
- (2) Baccarat-chemin de fer shall be played on a table having numbered player positions for no more than 14 players.
- (3) Both midi-baccarat and Mini-baccarat shall be played at a table having player positions for no more than nine players on one side of the table and a place for the dealer on the opposite side; provided however, that unless the cards are changed after each shoe, a midi-baccarat or mini-baccarat table using the dealing procedure in the authorized Rules of the Game of Midi-baccarat or Mini-baccarat shall have player positions for no more than six players. The dimensions of a midi-baccarat table and a mini-baccarat table shall be submitted to the Bureau.
- (4) A true-to-scale rendering and a color photograph of the layout(s) shall be submitted to the Bureau prior to utilizing the layout design. The layout for a baccarat, midi-baccarat, mini-baccarat, or baccarat-chemin de fer table shall contain, at a minimum:
 - (a) The name or trade name of the gaming licensee offering the game;
 - (b) For baccarat, midi-baccarat and mini-baccarat layouts, specific areas designated for the placement of wagers on the “Banker’s Hand”, “Players Hand”, and “Tie Hand”;
 - (c) For baccarat-chemin de fer layouts, specific areas for the placement of the wagers authorized by the authorized Rules of the Game of Baccarat - Chemin de Fer;
 - (d) For baccarat, midi-baccarat and mini-baccarat layouts, the phrase “Tie Bets pay 8 to 1”;
 - (e) Numbered areas that correspond to the seat numbers for the purpose of marking vigorish; provided, however, that the numbered areas are not required if:
 1. For baccarat, the gaming licensee offers a no vigorish variation of the game in accordance with the authorized Rules of the Game of Baccarat;
 2. For midi-baccarat or mini-baccarat, the gaming licensee only charges vigorish in accordance with the provisions of the authorized Rules of the Game of Midi-baccarat or Mini-baccarat or offers a no vigorish variation of the game in accordance with the provisions of the authorized Rules of the Game of Midi-baccarat or Mini-baccarat;
 - (f) An area designated for the placement of cards for the “Player’s” and “Banker’s” hands;
 - ~~(g) If a gaming licensee offers the optional total card wagers in the games of baccarat, midi-baccarat and mini-baccarat;~~
 - ~~1. Three specific areas at each player position designated for the placement of total card wagers on a total of four cards, five cards and six cards, and identified with the numerals “4”, “5”, and “6”, respectively, which areas shall be located between the areas designated for the placement of wagers on a “Tie Hand” and the “Banker’s Hand”; and~~
 - ~~2. An inscription on the layout indicating the payout odds for all total card wagers;~~
 - ~~(h) If a gaming licensee offers the optional bonus wager authorized by the authorized Rules of the Game of Baccarat or Mini-baccarat:~~
 - ~~1. Two separate areas at each player position designated for the placement of the optional bonus wager which shall be located, from the player’s perspective, immediately to the right of the areas designated for the placement of wagers on the “Banker’s Hand” and “Player’s Hand”; and~~
 - ~~2. An inscription identifying the payout odds for the optional bonus wager unless the gaming licensee chooses to comply with 205 CMR 146.18(7) through (9); and~~
 - ~~(i) If a gaming licensee offers the no vigorish variation of baccarat, midi-baccarat or mini-baccarat pursuant to the authorized Rules of the Game of Baccarat, Baccarat, Midi-baccarat, or Mini-baccarat, respectively:~~
 - ~~1. An area at each player position designated for placement of the “dragon 7” wager and inscribed with “dragon 7,” which area shall be located on the right side of the area designated for the placement of a “Tie Hand” wager when viewed by the player; and~~
 - ~~(g) An inscription identifying the payout odds for the dragon 7 wager unless the gaming licensee chooses to comply with 205 CMR 146.18(8).one or more additional wagers or a no vigorish version of baccarat, midi-baccarat, or mini-baccarat that permits additional wagers pursuant to the authorized Rules of the Game of Baccarat, Midi-baccarat or Mini-baccarat:~~
 1. Areas at each player position designated for the placement of the additional wager or wagers in accordance with the authorized Rules of the Game of Baccarat, Midi-baccarat or Mini-baccarat; and
 2. An inscription identifying the payout odds for the additional wager or wagers unless the gaming licensee chooses to comply with 205 CMR 146.18(7).

(5) If marker buttons are used for the purpose of marking vigorish, these marker buttons shall be placed in the table inventory float container or in a separate rack designed for the purpose of storing marker buttons and such rack shall be placed in front of the table inventory float container during gaming activity.

(6) Each baccarat, midi-baccarat and mini-baccarat table shall have a drop box and a tip box attached to it on the same side of the gaming table as, but on opposite sides of, the dealer.

(7) If the payout odds are not inscribed on the layout as ~~provided~~required by 205 CMR 146.18(4)(h)2., a sign shall be posted at each baccarat, midi-baccarat and mini-baccarat table ~~which offering offers the optional bonus~~an additional wager ~~or wagers~~ authorized by the authorized Rules of the Game of Baccarat, Midi-baccarat or Mini-baccarat listing the payout odds for the ~~optional bonus~~additional wager ~~or wagers~~.

~~(8) If the payout odds are not inscribed on the layout as provided by 205 CMR 146.18(4)(h)2., a sign shall be posted at each baccarat, midi-baccarat and mini-baccarat table offering the dragon 7 wager authorized by the authorized Rules of the Game of Baccarat, Baccarat, Midi-baccarat, or Mini-baccarat, respectively, indicating the payout odds for the dragon 7 wager.~~

~~(9) If the payout odds are not inscribed on the layout as provided by 205 CMR 146.18(4)(h)2., a sign shall be posted at each baccarat, midi-baccarat and mini-baccarat table offering the panda 8 wager authorized by the authorized Rules of the Game of Baccarat, Baccarat, Midi-baccarat, or Mini-baccarat, respectively, indicating the payout odds for the panda 8 wager.~~



AMENDED SMALL BUSINESS IMPACT STATEMENT

The Massachusetts Gaming Commission (“Commission”) hereby files this amended Small Business Impact Statement in accordance with G.L. c.30A, § 5 relative to the proposed adoption of **205 CMR 146.00: Gaming Equipment**, specifically **205 CMR 146.18: Baccarat, Midi-baccarat, Mini-baccarat, and Baccarat-chemin de Fer Tables; Physical Characteristics**, for which a public hearing was held on August 18, 2026.

This regulation was developed as part of promulgating regulations governing the operation of gaming establishments in the Commonwealth and the gaming equipment therein. The regulation is primarily governed by G.L. c.23K, §§ 2, 4(37), and 5.

The proposed amendments to the section are intended to add language for clarity, remove outdated language and references to layouts that are no longer in use and also provide clearer requirements to licensees regarding what is necessary to include on Midi and Mini Baccarat layouts. This regulation applies directly to gaming licensees, equipment manufacturers, and table games personnel; it is not anticipated to have an impact on small businesses.

In accordance with G.L. c.30A, §5, the Commission offers the following responses on whether any of the following methods of reducing the impact of the proposed regulation on small businesses would hinder achievement of the purpose of the proposed regulation:

1. Establishing less stringent compliance or reporting requirements for small businesses:

This regulation will not impose any additional reporting requirements for small businesses.

2. Establishing less stringent schedules or deadlines for compliance or reporting requirements for small businesses:

There are no schedules or deadlines for compliance or reporting requirements created or initiated by this regulation.

3. Consolidating or simplifying compliance or reporting requirements for small businesses:

This regulation does not impose any reporting requirements for small businesses.

4. Establishing performance standards for small businesses to replace design or operational standards required in the proposed regulation:



Massachusetts Gaming Commission

A performance standard is appropriate to prescribe the layout of Baccarat tables in casinos. It will provide clarity for patrons and is consistent with the Commission's approved rules for Baccarat, Mini Baccarat and Midi-Baccarat.

5. An analysis of whether the proposed regulation is likely to deter or encourage the formation of new businesses in the Commonwealth:

The intent of this regulation is to clarify the rules regarding payout odds and physical layout for the various games of Baccarat and will not deter nor encourage the formation of small businesses.

6. Minimizing adverse impact on small businesses by using alternative regulatory methods:

This amendment does not create any adverse impact on small businesses.

Massachusetts Gaming Commission
By:

/s/ Judith Young

Judith A. Young
Associate General Counsel
Legal Division

Dated: August 18, 2026



Massachusetts Gaming Commission



Legal Division

TO: Chair Jordan Maynard
Commissioner Eileen O'Brien
Commissioner Bradford Hill
Commissioner Nakisha Skinner
Commissioner Paul Brodeur

FROM: Jenna Hentoff, Deputy General Counsel
Burke Cain, Chief of the Gaming Agents Division
Dave DiOrio, Assistant Chief of the Gaming Agents Division
Kevin Gauvreau, Acting Director of Information Technology
Cristian Taveras, Gaming Technical Compliance Manager

CC: Kevin Scanlon, General Counsel
Caitlin Monahan, Director of the Investigations and Enforcement Bureau
Derek Lennon, Chief Financial and Accounting Officer

RE: Request for Approval of Wide Area Progressive at MGM Springfield

DATE: August 27, 2026

Summary

Blue Tarp reDevelopment, LLC d/b/a MGM Springfield ("MGM") has requested to join an existing multi-site progressive gaming device pursuant to 205 CMR 143.02(1)(h). Also known as a Wide Area Progressive ("WAP"), MGM is seeking to join a WAP that currently links multiple gaming devices across licensed casinos in different states operated by IGT. MGM is seeking the Commission's approval of the WAP in connection with the requirements outlined in 205 CMR 143.02 which governs these progressive gaming devices.

Regulation review

Progressive gaming devices are permitted pursuant to 205 CMR 143.02 and must be in compliance with the provisions of GLI-12: Progressive Gaming Devices in Casinos, which has been incorporated into, and amended by the Commission at, 205 CMR 143.02(1) to permit the operation of WAPs. The provisions in 205 CMR 143.02(1)(h) outline a series of requirements which must be met in order for a gaming licensee to operate or join a WAP in Massachusetts.

Under 205 CMR 143.02(1)(h), gaming licensees may operate a WAP pursuant to a slot system agreement ("agreement") entered into between the gaming licensee and a slot system operator, which is licensed as a Gaming Vendor – Primary. The agreement must contain information pertinent to the WAP itself, including a description of the WAP, the entity responsible for



Massachusetts Gaming Commission

providing initial funding, paying jackpots, fees and taxes, and filing required records or reports, methods to ensure accurate reporting of contributions, adherence to each state's tax laws, and to withdraw from the WAP, and procedures to address disputes, accept new participants, ensure the WAP is credentialed in each state and independently reconcile the jackpot amount when won. The entities must also have internal controls in place which govern the operation of slot machines and WAPs.

Pursuant to 205 CMR 143.02(1)(h), the WAP must also be controlled and operated from a computer monitoring room that is under the control of and maintained by the slot system operator and in a facility owned or leased by the slot system operator. An electronic or bound entry log must be kept to monitor who enters and exits the room which must also be accessible at all hours. The room must be designed in such a manner that the WAP is not disrupted and must provide continuous surveillance of the WAP with recordings maintained for at least 30 days.

Review of MGM request

MGM has notified the Commission of its desire to join an already established WAP that is operated by IGT and consists of linked gaming devices in casinos in multiple states. MGM and IGT have submitted their slot system agreement for review to ensure compliance with the requirements of 205 CMR 143.02(1)(h) as well as related internal controls for both entities. IGT further submitted its computer monitoring room for inspection for compliance with the requirements in 205 CMR 143.02(1)(h)3.n.

The Legal Division along with the Investigations and Enforcement Bureau ("IEB") and Gaming Technical Compliance Division ("GTC") have reviewed all submitted materials as well as inspected the computer monitoring room for compliance with the requirements of 205 CMR 143.02(1)(h). Upon review, certain information as required by regulation is not found in the slot system agreement itself but rather is found in internal controls applicable to the operation of the WAP by IGT. A waiver is being sought pursuant to 205 CMR 102.03(4)(a). Under that regulation, the Commission may grant a waiver from regulatory requirements which are not specifically required by law as long as granting the waiver is consistent with the purposes of G.L. c. 23K; will not interfere with the Commission or IEB's ability to fulfill its duties; will not adversely affect public interest; and would cause a substantial hardship if not granted. The elements required to grant a waiver have been met in this instance where taken as a whole, the submitted materials do meet the requirements of 205 CMR 143.02(1)(h). Further, the GTC's review of IGT's computer monitoring room found that it meets all requirements of 205 CMR 143.02(1)(h)3.n.

Recommendation

The Legal Division, in collaboration with the IEB and GTC, confirms that all requirements have been met under 205 CMR 143.02(1)(h) and recommends that MGM's request to add this WAP be approved along with its waiver request.



MASSACHUSETTS GAMING COMMISSION WAIVER/VARIANCE REQUEST FORM

In accordance with 205 CMR 202.03; 205 CMR 102.03(4)

Please fill out and address all areas of the form with blue section headers. If a specific line does not apply to the request, please place 'NA' in the response field. Each section will extend to accommodate large answers.

CONTACT INFORMATION

DATE: 8/14/2026

NAME OF LICENSEE / OPERATOR (REQUESTING ENTITY): Blue Tarp reDevelopment, LLC dba MGM Springfield

NAME OF INDIVIDUAL COMPILING REQUEST: Daniel Miller

TITLE OF INDIVIDUAL COMPILING REQUEST: Compliance Director

CONTACT EMAIL ADDRESS: dmiller@mgmspringfield.com

CONTACT PHONE NUMBER: 413-557-8143

EMAIL/PHONE NUMBER FOR PROVIDING DECISION (IF DIFFERENT FROM CONTACT):

REGULATION INFORMATION

SPECIFIC REGULATION (#) FOR WHICH WAIVER IS REQUESTED: 143.02(1)(h)(3)

REGULATION SECTION TITLE: Progressive Gaming Devices

REGULATION LANGUAGE/TEXT:

3. Each slot system agreement shall specifically identify and describe the role, authority, and responsibilities of each participating casino and each slot system operator in the conduct of the WAP. The agreement shall comply with GLI-12 or specifically identify where it deviates from the GLI-12 standards. The agreement shall include the following:

e. The method to ensure the accurate accounting of all contributions;

f. The method to ensure that each participating state's tax laws are adhered to;

Said method to include a description for determining the pro rata share of a system payout for purposes of gross revenue deductibility and its method for determining the proportionate share of gaming taxes and fees owed by the operator to the casino. In calculating gross revenue, a casino may deduct its pro rata share of a payout from a game played in a WAP system. The amount of the deduction must be determined based upon the written agreement among the licensed gaming establishments participating in the WAP system and the operator of the system. All cash prizes and the value of noncash prizes awarded during a contest or tournament conducted in conjunction with a WAP system are also deductible on a pro rata basis, to the extent of the compensation received for the right to participate in that contest or tournament. The deductions may be taken only by those participating licensed



gaming establishments that held an active gaming license at any time during the month in which the payout was awarded.

h. Procedures to accept additional participants once the link is established in casinos of more than one state;

i. Procedures to ensure the multistate progressive system operator is credentialed in all participating states;

k. Multistate progressive system parameter requirements including:

i. Maximum odds for obtaining the multistate jackpot;

ii. The base amount of the multistate jackpot award;

iii. The reset amount of the multistate jackpot award;

iv. The rate of increment of the multistate jackpot award;

v. The hidden rate, which means the increment rate for one or more reserve pools used to fund the next reset amount when applicable;

vi. The minimum wager required to qualify for the progressive jackpot; and

vii. Any other parameter as may be required in order to ensure the proper accounting and auditing of the multistate progressive system.

l. Procedures for the independent reconciliation of the multistate jackpot amount when won.

REASON FOR REQUEST OF WAIVER

DATE(S)/ TIMEFRAME WAIVER IS REQUESTED THROUGH: Permanent

Per 205 CMR 102.03(4)(b)

PLEASE EXPLAIN THE BASIS FOR THE PROPOSED WAIVER/VARIANCE SOUGHT: The requirements of subsections, e, f, h, i, k and l aren't in the slot system agreement, but are represented either in MGMS related ICs, SOPs, or IGT's SOPs. The related ICs and SOPs uphold the tenets of the agreement as well as the regulation.

Per 205 CMR 102.03 (4)(a)(4)

PLEASE INDICATE THE SUBSTANTIAL HARDSHIP/IMPACT YOUR ENTITY WOULD INCUR IF WAIVER/VARIANCE IS NOT APPROVED BY COMMISSION: MGM Resorts International would need to reopen and potentially renegotiate the slot system agreement. This agreement has been in place for over 20 years, working across multiple additional jurisdictions, where the language has been deemed acceptable as is.

ADDITIONAL JUSTIFICATION/EXPLANATION FOR REQUEST: Since the required language is found in other governing documents, it meets at least the functional equivalent of the requirements.

DETERMINATION



Pursuant to 205 CMR 102.03(4)(a), and 205 CMR 202.03(2), the Commission may waive or grant a variance if the Commission finds that:

1. Granting the waiver or variance is consistent with the purposes of M.G.L. c. 23K and c. 23N;
2. Granting the waiver or variance will not interfere with the ability of the commission or the bureau to fulfill its duties;
3. Granting the waiver or variance will not adversely affect the public interest; and
4. Not granting the waiver or variance would cause a substantial hardship to the person requesting the waiver or variance.

Pursuant to 205 CMR 102.03 (4)(c), any waiver request not acted on by the Commission within 60 days of filing shall be deemed denied.

