

**DECISION OF THE MARYLAND LOTTERY AND
GAMING CONTROL COMMISSION**

**Application for Sports Wagering Facility License
Maryland Stadium Sub, LLC**

License Applicant No. 2021-SW-28

**Qualification Hearing before
the Maryland Lottery and Gaming Control Commission
August 10, 2022**

On August 10, 2022, the Maryland Lottery and Gaming Control Commission (“Commission”) held a meeting during which it conducted a hearing to determine whether Maryland Stadium Sub, LLC (“Applicant” or “Maryland Stadium Sub”) is qualified for a sports wagering facility license under Maryland’s Sports Wagering Law.

FINDINGS OF FACT

Background Process

1. Sports wagering in Maryland is governed by the Sports Wagering Law, found in State Government Article (“SG”), Title 9, Subtitle 1E, Annotated Code of Maryland, and the regulations of the Commission, found in the Code of Maryland Regulations (“COMAR”) 36.10. The Sports Wagering Law also incorporates the Gaming Law, which governs casino operations in Maryland, found in SG, Title 9, Subtitle 1A, and COMAR 36.03.

2. The Commission is authorized to issue licenses necessary for sports wagering in the State, one of which is a sports wagering facility license. Unless a person holds a valid sports wagering facility license issued by the Commission, the person may not conduct, offer, or operate in-person sports wagering at a location in the State.

3. An applicant for a sports wagering-related license must submit an application to the Commission. Before it can be issued a license, an applicant must meet all applicable qualification

requirements in the Sports Wagering Law, and prove to the Commission, by clear and convincing evidence, that it is qualified under SG § 9-1E-07(e) and COMAR 36.10.03.02, and not disqualified under COMAR 36.10.03.02C. The Commission is required to deny the license application of an applicant that does not meet qualification requirements. SG § 9-1E-07(g)(1).

4. An applicant must submit to the Commission all information that is necessary for the Commission to determine its qualifications, and those of its principals, its principal entities, and any other necessary qualifiers.

5. Maryland Stadium Sub submitted an A-1 Sports Wagering Facility License Application to the Commission and the Maryland Lottery and Gaming Control Agency (“MLGCA”) conducted an investigation to determine whether Maryland Stadium Sub is qualified for an A-1 Sports Wagering Facility License.

Qualification Hearing – August 10, 2022

6. Staff of the MLGCA’s Licensing Division provided the Applicant with written notice of the hearing. Daniel Snyder and James McCarroll, counsel to Mr. Snyder, were present virtually on behalf of the Applicant. In advance of the meeting, John J. Mooney, MLGCA’s Managing Director of Regulatory Oversight, provided the Commission the confidential full investigative report on Maryland Stadium Sub. Mr. Mooney made publicly available Staff’s executive summary of the background investigation, and Staff’s recommendations.

Applicant’s Background

7. Maryland Stadium Sub, LLC was incorporated in Delaware on September 29, 2021, for the purpose of operating a sports wagering facility at FedEx Field (home of the “Washington Commanders”) located in Landover, Maryland; it is registered to do business in Maryland.

Ownership of Applicant

8. Maryland Stadium Sub is solely owned by Daniel Marc Snyder.
9. Mr. Snyder is the majority owner of the “Washington Commanders” (NFL franchise).

Licensing Inquiry - Maryland

10. Maryland Stadium Sub has submitted an A-1 Sports Wagering Facility License Application to the Commission.
11. Mr. Snyder has submitted a Principal Employee License Application to the Commission.

Licensing Inquiry – Other Sports Betting Jurisdictions

12. On January 21, 2020, the Virginia Lottery granted a joint sports betting permit to the Commanders with Betfair Interactive US, LLC (d/b/a FanDuel).
13. The Commanders, in conjunction with Betfair Interactive US, LLC have remained in good standing with the Virginia Lottery.
14. The Virginia Lottery confirmed that on April 24, 2022, Mr. Snyder was granted a Sports Betting Principal license which expires on April 1, 2025.

Discussion of Financial Performance

15. Maryland Stadium Sub has had no financial activity since it was established.
16. All costs associated with the formation of Maryland Stadium Sub as well as all license application fees were borne solely by Mr. Snyder.

Discussion of Background Investigation

17. An internet records search was conducted for any bankruptcy, civil or criminal litigation involving Maryland Stadium Sub, LLC. No criminal cases were noted; however,

MLGCA identified several noteworthy issues involving the Washington Commanders (formerly known as the “Washington Football Team” (“WFT”) and the “Washington Redskins”) and the owner, Mr. Snyder.

18. MLGCA investigators interviewed Mr. Snyder and separately met with attorneys Mali Friedman, Chief Legal Officer and SVP, Business Affairs at Washington Commanders; and James McCarroll and Jordan Siev of Reed Smith, LLP, counsel for Mr. Snyder. During the interview with Mr. Snyder and the meeting with the attorneys, the noteworthy issues involving Mr. Snyder and the Washington Commanders were discussed.

19. After a thorough review of all the information provided on behalf of Maryland Stadium Sub and Mr. Snyder, and following the personal interview with Mr. Snyder, MLGCA Staff is unable to substantiate any of the allegations against Mr. Snyder.

20. Currently, Mr. Snyder is not under investigation by any law enforcement agency or government entity for any criminal-related matters.

21. Subsequent to Mr. Snyder’s July 28, 2022 Congressional testimony, Mr. McCarroll, Mr. Snyder’s counsel, ensured MLGCA that Mr. Snyder’s testimony was consistent with the testimony and information he provided during MLGCA’s investigation and interview with him.

Results of Background Investigation

22. MLGCA conducted a complete and thorough background investigation as authorized under the Sports Wagering Law by analyzing corporate records and documents; scrutinizing the business operations, practices, and transactions of Maryland Stadium Sub, LLC; and conducting interviews of key personnel, focusing on required qualification criteria involving integrity and financial stability.

23. MLGCA adhered to well-defined and approved investigative protocols in

assembling the factual information incorporated in the MLGCA's report. The results of the investigation for the specific qualification criteria enunciated in SG§ 9-1E-07(e)(6), COMAR 36.10.03.02 and COMAR 36.10.04.06, and that Maryland Stadium Sub is qualified under SG § 9-1E-07(e), and not disqualified under COMAR 36.10.03.02C, are summarized:

a) Financial Stability, Integrity and Responsibility

A comprehensive review was conducted of all of the consolidated financial statements. The Applicant satisfied the standards for financial stability, integrity and responsibility in connection with the A-1 Sports Wagering Facility License Application. Maryland Stadium Sub was found to have financial stability, integrity and responsibility.

b) Integrity of financial backers, investors, mortgages, bondholders, and other holders of indebtedness

Based on MLGCA review, there are no material issues involving the known financial backer of the Applicant.

c) Good character, honesty, and integrity

MLGCA found that the Maryland Stadium Sub possesses the requisite good character, honesty and integrity.

d) Sufficient business ability and experience

Maryland Stadium Sub has sufficient business ability and experience.

e) Potential disqualifying factors

The Applicant is not disqualified from being issued an A-1 Sports Wagering Facility License under SG § 9-1E-07(g)(1) based on any of the criteria listed in SG § 9-1E-07(e)(6) and COMAR 36.10.03.02.

Applicant and Principal Entities

24. The Applicant satisfies the applicable qualification criteria under SG § 9-1E-07(e)(6) and COMAR 36.10.03.02, are qualified under SG § 9-1E-07(e), and not disqualified under COMAR 36.10.03.02C and SG § 9-1E-07(g)(1).

25. Maryland Stadium Sub has no principal entities; it is solely owned by Mr. Snyder.

Principal Qualifiers

26. MLGCA identified the following natural person qualifier (“principal”) who is associated with the Applicant and found that the principal has satisfied the applicable qualification criteria under SG § 9-1E-07(e)(6), COMAR 36.10.03.02, and COMAR 36.10.06.05, and is not disqualified under COMAR 36.10.03.02C: Daniel Snyder.

Sports Wagering Facility License Application

27. The Applicant submitted a completed A-1 Sports Wagering Facility License application; an affidavit attesting to the minority and women-owned interests of the applicant; all required fees; and proof of adequate bond.

28. MLGCA Staff is not aware of information that would indicate Maryland Stadium Sub, LLC fails to meet the Commission’s qualification requirements.

29. MLGCA Staff recommends that the Commission determine the Applicant has established that it is qualified, by clear and convincing evidence, for a Class A-1 Sports Wagering Facility License.

CONCLUSIONS OF LAW

1. The Applicant has established by clear and convincing evidence that it is qualified for, and is not disqualified from, a Class A-1 Sports Wagering Facility License.

2. The Applicant remains under an ongoing obligation to comply with all qualification requirements and to notify the Commission if any of the information submitted to the Commission or MLGCA changes.

3. If MLGCA Staff determines that the Applicant or licensee, if licensed, does not meet a Commission standard, the Commission may take enforcement action, up to and including revocation of the license.

4. The Secretary of the Commission will transmit this decision statement to the Sports Wagering Application Review Commission.

REVIEW RIGHTS

A party aggrieved by this final administrative Decision may file a petition for judicial review with the circuit court for the county where any party resides or has a principal place of business within thirty days of the date of this Decision. SG § 10-222; Maryland Rules 7-201 – 7-211.



E. Randolph Marriner, Chair

08/10/2022
Date