

Maryland Lottery and Gaming Control Agency

Wes Moore, Governor • John Martin, Director



Montgomery Park Business Center
1800 Washington Blvd., Ste. 330
Baltimore, Maryland 21230

Tel: 410-230-8800
TTY users call Maryland Relay
www.mdlottery.com

March 18, 2025

High Entertainment, LLC
2801 Centerville Road
Wilmington, DE 19808

Via Mail and Via Email: support@high5games.com

RE: High Entertainment, LLC d/b/a High 5 Casino Business in Maryland

Dear Legal Counsel:

It has come to the Maryland Lottery and Gaming Control Agency's ("MLGCA") attention that High Entertainment, LLC d/b/a High 5 Casino ("High Entertainment"), is offering and conducting online gaming activities in Maryland without legal authority to do so. Maryland has enumerated laws that identify the types of gaming that may be offered in the State. If the game or activity does not fit within one of those enumerated provisions, then that game or activity is not permitted in the State.

The laws and regulations governing the operation of sports wagering in Maryland are found at State Government Article ("SG") § 9-1E-01, Annotated Code of Maryland, and Code of Maryland Regulations ("COMAR") 36.10 and 36.11. The laws and regulations governing the operation of casino gaming in Maryland are found in SG §§ 9-1A *et seq.* and COMAR 36.03. The laws and regulations governing the operation of fantasy competitions in Maryland are found at SG §§ 9-1D-01 *et seq.*, and COMAR 36.09.

The only online gaming permitted in Maryland is mobile/online sports wagering and online fantasy competitions. In Maryland, sports wagering is prohibited unless the operator has first been issued a sports wagering license by the Maryland Lottery and Gaming Control Commission ("Commission"). Fantasy competition operators must be registered with the Commission. Online casino gaming (also known as iGaming) is not permitted in Maryland, and an operator is prohibited from offering any casino gaming unless licensed by the Commission. The Commission has no record of High Entertainment being issued a sports wagering license, a casino gaming license, or registration as a fantasy competition operator.

Please send me a responsive email no later than 5:00 pm ET on April 2, 2025. If High Entertainment is not offering sports wagering, casino gaming or fantasy competitions in Maryland, please include in your responsive email a statement confirming that High Entertainment is not offering or conducting any of these gaming activities in Maryland.

If High Entertainment is offering any of these gaming activities in Maryland, please include in your responsive email:

- 1) A detailed description of the name of each casino game offering, along with its mobile link, or its retail location and trade name, as applicable;
- 2) A detailed description of each sports wagering offering, along with its mobile link, or its retail location and trade name, as applicable;
- 3) A detailed description of each fantasy competition offering, along with its mobile link, or its retail location and trade name, as applicable; and

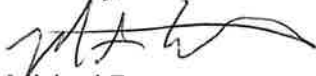
- 4) Any legal analysis or opinion interpreting Maryland Law that concludes, advises, or suggests that High Entertainment may legally offer sports wagering, casino games or fantasy competition games in Maryland without Commission registration or licensure.

If High Entertainment is offering in Maryland any sports wagering or casino gaming activity for which it has not been licensed, or is operating fantasy competition games without being registered, please acknowledge in your response that High Entertainment will cease offering any sports wagering, casino game, or fantasy competition in Maryland, and a date within 10 days from the date of this letter in which you intend to cease such operations.

Your failure to provide the required information may jeopardize the ability of High Entertainment to ever be issued: a license for sports wagering or gaming, registration as a fantasy competition operator, any other license, registration, or certification from the Commission in the future.

I look forward to your prompt response to me at michael.eaton@maryland.gov. If you have any questions, you may reach me by phone at 410-230-8821.

Sincerely,



Michael Eaton
Managing Director, Gaming