



December 16, 2024

*Via Electronic Mail*

Maryland Lottery and Gaming Control Agency  
Attn: Assistant Deputy Director James B. Butler  
1800 Washington Blvd., Suite 300, Baltimore, MD 21230

**RE: Sports Wagering Regulations for Comment**

Dear Assistant Deputy Director James B. Butler,

BetMGM thanks the Maryland Lottery and Gaming Control Agency for offering the opportunity to review and provide comments on the proposed Maryland Sports Wagering regulations. Leveraging its extensive expertise as a sports betting operator and its collaborative efforts with regulators in twenty-nine jurisdictions during the formulation of their regulations, BetMGM aims to provide constructive input to enhance the effectiveness of Maryland operations and align the proposed procedures with the regulations of other states for consistency. The Maryland proposed amendments are listed below with BetMGM's proposed additions and removals to the regulation in redline.

BetMGM respectfully submits the following comments for consideration.

**36.10.18.04 Geolocation Systems**

**Proposed Regulation Update:**

E. A sports wagering licensee shall:

1. Prior to commencing operations, ~~and annually thereafter,~~ ensure its geolocation system is tested by a Commission approved testing laboratory.

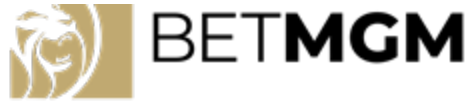
**Reason for Revision:** BetMGM respectfully requests removing the 'annually thereafter' testing by a Commission approved testing laboratory requirement which is currently not required by any other jurisdiction. BetMGM performs geolocation testing and certification for all new jurisdictions to ensure the accuracy of the geofence configurations. BetMGM also conducts quarterly internal testing and verification of the Geolocation provider's client-side solution to ensure the version that is integrated into our products aligns with Independent Test Lab and/or regulatory approvals. Beyond these verifications, all other geolocation configurations are maintained and the responsibility of the geolocation provider.

**36.10.13.06 Annual Audit and Other Regulatory Reports**

**Proposed Regulation Update:**

B. The annual financial statements shall be:

2. If the revenue and assets of the Maryland sports wagering licensee operations are less than seventy five percent of the combined total of the operator's parent, ~~the sports wagering licensee will submit an audited supplemental schedule of revenue and expenses for Maryland in addition to the consolidated audited financial statements. Maryland-specific audited annual financial statements of the sports wagering licensee revenue and audits.~~ ~~the sports wagering licensee will submit an audited supplemental schedule of revenue and expenses for Maryland in addition to the consolidated audited financial statements. Maryland-specific audited annual financial statements of the sports wagering licensee revenue and audits.~~



**Reason for Revision:** BetMGM respectfully requests revising the provided language. BetMGM, as a subordinate license of MGM, currently does not submit anything under this rule, only MGM does. If BetMGM would now be required to submit financial reporting under this rule, we would suggest we submit the audited supplemental schedule of revenue and expenses and our consolidated audited financial statements.

**36.10.13.37 Bettor Complaints**

**Proposed Regulation Update:**

- A. A sports wagering licensee shall attempt to timely resolve a dispute with a bettor concerning the licensee's sports wagering operation or payment of alleged winnings within ~~7~~ 10 days after receiving the complaint.

**Reason for Revision:** BetMGM respectfully requests that the provided language be revised to extend the dispute resolution timeframe from 7 days to 10 days. The additional time would allow the operators to fully investigate complaints, gather and review relevant evidence and consult necessary stakeholders. A 10-day window is a widely accepted and reasonable timeframe for dispute resolution in the gaming industry. Several other regulatory bodies already adhere to a 10-day turnaround for complaint resolutions, including the Indiana Gaming Commission, the Colorado Division of Gaming, the Arizona Department of Gaming, and the Ohio Casino Control Commission.

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We again want to express our appreciation for your thoughtful consideration of BetMGM's feedback on the Maryland Lottery and Gaming Control Agency's proposed regulations. Should you have any questions about our submission or wish to discuss it further, please feel free to contact us.

Sincerely,

BetMGM