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Date: August 8, 2025

VIA E-MAIL ONLY TO: michael.eaton@maryland.gov

Everett D. Browning, Sr. - Chairman
Maryland Lottery and Gaming Control Commission
c/o Michael Eaton, Managing Director, Gaming
1800 Washington Blvd., Suite 330
Baltimore, MD 21230

Re: bet365 Request for Consideration (36.10.13.39(F)(2) - Promotional Play Deduction Based on 2023 Activity)

Chairman Browning:

I am writing to you to formally request a variance in relation to regulation 36.10.13.39(F)(2). bet365 is partnered with Riverboat on-the-Potomac, who is a sports wagering license holder in the state of Maryland. Prior to this partnership, Riverboat on-the-Potomac was associated with a different mobile sports wagering operator, who was active in the state from November 2022 to February 2024.

While we fully appreciate that regulation 36.10.13.39(F)(2) sets limits on promotional play deductions based on the prior fiscal year of the sports wagering license holder, we would request that the calculation be based off of 2023 activity, instead of 2024 activity, since the mobile sports wagering operator was only live for just over one month in 2024. As a new operator looking to succeed in Maryland and grow our customer base, we feel having our first-year cap based on such limited activity in 2024, would create a huge disadvantage to us compared to other active operators who are basing this cap off of a full prior year of activity.

It is not uncommon for new operators in a new market to promo heaviest upon launch in an attempt to obtain market share, and we will likely be no different in Maryland. That said, we are also very confident in our product, and the addition of a new market leader should increase competition in the state, which will provide a better experience for Maryland residents. It is also our view that tax earned by the state would inevitably increase in a more competitive environment where customers have more options, and this would significantly outweigh a short-term gain the state would incur from limiting our deductible promo spend based on such limited activity in 2024.

We are confident that our operational capabilities, combined with our commitment to responsible gaming and customer satisfaction, will align with the Agency's objectives for the state and as such are respectfully requesting the Commission's consideration of our request above. Thank you for your consideration.

If you have any questions or concerns, please contact me at peter.wolff@bet365.com or (302) 399-3699.

Sincerely,

Peter Wolff
Associate Vice President of Compliance (bet365)