Canton Gaming LLC

3904 Boston St, Ste 401 Baltimore MD 21224

TO: Sports Wagering Application Review Commission ("SWARC") and

Maryland Lottery and Gaming Control Commission ("MLGCC") Members

CC: Mr. James B. Butler, Assistant Deputy Director, Chief of Staff, MLGCA

Mr. George H. Butler, Jr., Principal Policy Analyst, DLS

FROM: Mark Sapperstein

DATE: August 8, 2025

RE: Canton Gaming, LLC – Class B-2 Sports Wagering Facility License –

Relocation Request within Baltimore County - from 319 York Road in

Towson to 1008 Reisterstown Road in Pikesville.

Dear SWARC and MLGCC Commission members,

Canton Gaming, LLC was deemed qualified to hold a Class B-2 Sports Wagering Facility License by MLGCC on <u>January 26th. 2023</u>, and subsequently was awarded a Class B-2 Facility License by SWARC on <u>February 15th. 2023</u>. Canton Gaming officially launched retail sports wagering at The Greene Turtle in Towson (located at 319 York Road) on September 29th, 2023, and ceased sports wagering activity at this facility on February 9th, 2025.

Under Chapters 332 and 333 of the Acts of 2025, effective July 1st, Section 9-1E-07(j) of the State Government Article permits a competitively awarded Class B-2 sports wagering facility licensee (originally issued on or before September 30th, 2023) to submit a written request to MLGCC and SWARC for relocation, provided the new facility: (i) is located in the same county as the current facility; and (ii) complies with existing statutory location requirements (i.e. is not located in an exclusion zone).

Canton Gaming, LLC requests that MLGCC and SWARC approve this request to relocate our Class B-2 Sports Wagering Facility License from 319 York Road in Towson, to 1008 Reisterstown Road in Pikesville. The retail sports betting landscape in Maryland is particularly challenging: of the five competitively awarded Class B-2 facility licenses, only three have launched, to-date. Canton Gaming feels that the relocation request, wholly within Baltimore County, is in the public interest to continue providing "enhanced State fiscal resources for education" and "economic development and job opportunities spurred by the sports wagering industry." We truly appreciate the consideration.

Sincerely,

Mark Sapperstein



DECISION OF THE SPORTS WAGERING APPLICATION REVIEW COMMISSION

Request for Relocation of Sports Wagering Facility Canton Gaming LLC d/b/a Finest Flag Gaming (Towson)

before The Sports Wagering Application Review Commission August 13, 2025

On August 13, 2025, the Sports Wagering Application Review Commission ("SWARC") held a virtual public meeting during which it considered whether Canton Gaming LLC d/b/a Finest Flag Gaming (Towson) ("Licensee") may relocate its Class B–2 sports wagering facility in accordance with § 9–1E–07(j) of the State Government Article.

EVALUATION OF APPLICATION

The Licensee submitted to the State Lottery and Gaming Control Commission (SLGCC) a request to relocate its sports wagering facility at 319 York Road, Towson, MD 21204 so that the Licensee may conduct and operate sports wagering at a facility located at 1008 Reisterstown Road, Pikesville, MD 21208.

As provided under § 9–1E–07(j) of the State Government Article, SLGCC may grant a request to relocate a sports wagering facility only if (1) the sports wagering facility was originally issued a Class B sports wagering facility license on or before September 30, 2023, and (2) the new location for the sports wagering facility (i) is within the same county, (ii) complies with the location requirements under § 9–1E–06 of the State Government Article, and (iii) is approved by SWARC. Each member of SWARC received a copy of Licensee's relocation request. In addition, staff provided SWARC members with a summary of the relocation request to facilitate review.

In evaluating Licensee's relocation request, SWARC applied the relevant statutory criteria and considered the public interest. As provided under § 9–1E–15(o) of the State Government Article, SWARC may not award a sports wagering license unless it determines and declares that the award is in the public interest and consistent with the purposes of State Government Article, Title 9, Subtitle 1E.

FINDINGS OF FACT

- 1. On January 26, 2023, SLGCC determined that the Licensee is qualified for a sports wagering facility license.
- 2. On February 15, 2023, SWARC awarded a Class B–2 sports wagering facility license to the Licensee to conduct and operate sports wagering at 319 York Road, Towson, MD 21204 contingent on the Applicant entering into a Memorandum of Understanding with SWARC, as required by § 9–1E–15(i)(2) of the State Government Article.

- 3. On February 15, 2023, following the execution of the Memorandum of Understanding required by § 9–1E–15(i)(2) of the State Government Article, staff for SWARC transmitted notice of the license award to SLGCC.
- 4. On September 29, 2023, the State Lottery and Gaming Control Agency issued the Licensee a Class B–2 sports wagering facility license.
- 5. On August 11, 2025, the Licensee submitted a request to SLGCC to relocate its Class B–2 sports wagering facility from 319 York Road, Towson, MD 21204 to 1008 Reisterstown Road, Pikesville, MD 21208.
- 6. The proposed location 1008 Reisterstown Road, Pikesville, MD 21208 is within the same county (Baltimore County) as 319 York Road, Towson, MD 21204 and complies with the location requirements under § 9–1E–06 of the State Government Article.
- 7. SWARC finds that relocation of the sports wagering facility by the Licensee is in the public interest for the following reasons: (1) continuing State fiscal resources for education; (2) continuing economic development and employment opportunities spurred by the sports wagering industry; (3) maintaining the active license provides opportunities for individuals who satisfy the personal net worth requirements under COMAR 36.11.02.19 to participate in the sports wagering industry; (4) the Licensee has held and continues to hold a sports wagering facility license in good standing; and (5) all obligations by the Licensee under the Memorandum of Understanding dated February 15, 2023 and diversity plan dated March 15, 2023 remain in effect and unchanged.

CONCLUSIONS OF LAW

- 1. SWARC has determined that the Licensee's request for relocation satisfies the statutory criteria under § 9–1E–07(j) of the State Government Article.
- 2. SWARC hereby approves the relocation of the Licensee's Class B–2 sports wagering facility from 319 York Road, Towson, MD 21204 to 1008 Reisterstown Road, Pikesville, MD 21208.
 - 3. Staff for SWARC shall transmit notice of this approval to SLGCC.

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Thomas M. Brandt, Jr., Chair	Date