
MARYLAND LOTTERY and GAMING CONTROL COMMISSION

1800 Washington Blvd., Suite 330, Baltimore, Maryland 21230

COMMISSION REPORT



**In Re the Application of
Crab Services Inc.**

**SPORTS WAGERING FACILITY
OPERATOR LICENSE APPLICANT**

License Applicant No.: SW-2025-06

Report Date: September 15, 2025

“Public Report”

INTRODUCTION

Role of the Maryland Lottery and Gaming Control Commission (“Commission”)

The Commission is required to determine whether sports wagering applicants have proven, by clear and convincing evidence, that they meet the qualifications for licensure under the Sports Wagering Law. Requirements for qualification include: (1) applicant’s financial stability and integrity; (2) integrity of any financial backers related to the application; (3) applicant’s good character, honesty, and integrity; (4) applicant’s business ability; and (5) whether there are any mandatory disqualifiers that prevent the applicant from proving its qualifications by clear and convincing evidence. The Commission cannot issue a license unless it determines that the applicant is qualified.

The Regulatory Licensing and Investigations Division of the Maryland Lottery and Gaming Control Agency (“Agency”) conducts the required background investigation of an applicant’s qualifications. A report of the background investigation is provided to the Commission to assist it in determining whether the applicant described in this Report has proven that it is qualified.

The Executive Summary that will be summarized by Staff at the Commission meeting is a public document, which will be provided in the Commission packets, and is also available on the Agency website with other Commission meeting documents. If the applicant is found qualified, the Agency will work with the operator to ensure that all applicable requirements are met prior to issuing a license to operate.

Process

As a prerequisite to being eligible for a Sports Wagering Facility Operator License, an applicant must submit a Sports Wagering Facility Operator License Application to the Commission. The applicant must prove to the Commission, by clear and convincing evidence, that it meets the qualification criteria set forth in the Annotated Code of Maryland, State Gov’t Article (“SG”), § 9-1E and the Commission’s sports wagering regulations in Code of Maryland Regulations (“COMAR”) 36.10 (collectively, “the Sports Wagering Law”). The Sports Wagering Law also includes and incorporates applicable licensing requirements in SG § 9-1A,

and COMAR 36.03 (collectively, “the Gaming Law”), which establishes requirements for all casino-related licenses.

Specifically, the applicant must prove that it is qualified under SG § 9-1E-07(e) and COMAR 36.10.03.02 and 36.10.06.03 and not disqualified under SG § 9-1E-07(g)(1). An applicant must provide all information to the Commission that is necessary for a qualification determination as to the applicant, its principals, and its principal entities.

The Applicant

The Agency (“Agency,” “we” or “our”), conducted a suitability background license investigation of Crab Services Inc. (“Crab Services” or “Applicant”), in connection with its application for a Sports Wagering Facility Operator License.

Crab Services was incorporated in Delaware on February 4, 2025 and has its principal office located at 139 Deer Drive, Lusby, Maryland.

INVESTIGATION INTO APPLICANT

Background

Crab Services currently holds a Sports Wagering Facility Operator and Online Sports Wagering Operator License issued by the Commission and has been operating since June of 2025 in Maryland. Crab Services will continue to provide comprehensive operational services to support regulated sports wagering for an additional location. The services that Crab Services will provide includes end-to-end sportsbook management services across retail channels, covering trading and risk management oversight, customer relationship management service, marketing and promotions, and affiliate and partnership programs. Crab Services has submitted a Sports Wagering Facility Operator License Application with the Commission for Canton Gaming’s sportsbook in a new location in Pikesville.

Ownership of the Applicant

Crab Services is privately-owned with the following individuals and entity having a 5% or greater ownership interest in the Applicant:

- Mr. Derek Baker
- Ms. Adele Sinclair

- Complete and Equal Understanding, LLC Mr. Derek Baker and Ms. Adele Sinclair each hold a Principal Employee License in Maryland, and Complete and Equal Understanding, LLC has previously submitted a Sports Wagering Principal Entity Disclosure Form with the Commission.

Agreement with Canton Gaming, LLC

Crab Services previously entered into an Operating Agreement with Canton Gaming, LLC, (“Canton Gaming”), who currently conducts retail sports wagering activities at The Greene Turtle sports bar located at 3803 Boston Street, Baltimore, Maryland. Canton Gaming is licensed as a Sport Wagering Facility in Maryland and is financially backed by its majority owner, Mr. Mark Sapperstein, a Commission-licensed Principal Employee.

In August of 2025, Crab Services entered into an operating agreement, similar to the aforementioned agreement, to operate Canton Gaming, LLC d/b/a Finest Flag Gaming’s retail sportsbook located at 1008 Reisterstown Road, Pikesville, Maryland, a location the Commission approved at its August 28, 2025 Commission Meeting. Under the terms of the Operating Agreement, Crab Services manages the daily operations of the sportsbook, supplies Canton Gaming with required financial and operational reports, ensures compliance with all applicable gaming regulations, and ensures that the sportsbook operation meets responsible gaming and anti-money laundering requirements. The Operating Agreement is for a three-year term that commenced in May of 2025 when the Commission qualified Crab Services for a Sports Wagering Facility Operator License for Canton Gaming’s Canton location.

On December 11, 2024, Crab Sports, Inc., an affiliate of Crab Services Inc., entered into a Services and Equipment Agreement (the “Agreement”) with Internet Sports International, Ltd. (“ISI”), a provider of retail sportsbook solutions for small to medium sized commercial and tribal casinos. An addendum to the Agreement was signed by Crab Sports, Inc., ISI and Canton Gaming, LLC on December 19, 2024, whereby Crab Sports, Inc. agreed to assign its rights and delegate its responsibilities under the Agreement to Canton Gaming.

Under the terms of the Agreement, ISI will provide Canton Gaming the equipment, software, services, and support necessary to integrate its sports betting platform with Canton Gaming’s existing sports betting kiosks, and provide betting odds on sporting events. The initial term of the Agreement is five years, and either party may terminate the Agreement without cause

by the end of the third year after providing six months written notice. Internet Sports International, Ltd. is a Commission-licensed Sports Wagering Contractor since June 8, 2025.

FINDINGS

As previously noted, Crab Services was recently formed on February 4, 2025, and has been operating as a Sports Wagering Facility Operator and Online Sports Wagering Operator since June of 2025. During this brief period, Crab Services has operated in accordance with all of its regulatory responsibilities. Agency Staff conducted an internet records search for any litigation filings (bankruptcy, civil or criminal) pertaining to Crab Services. No such litigation was identified in our search and the Applicant did not disclose any pending or settled litigation in its license application. Additionally, we attempted to obtain a Dun & Bradstreet investigative report on Crab Services but no report was available. Nothing came to our attention during the course of our review that would lead us to conclude that Crab Services is unsuitable for licensure as a Sports Wagering Facility Operator at Canton Gaming's Pikesville location.

The Agency conducted a complete and thorough background investigation as authorized under the Sports Wagering Law of Crabs Services by conducting interviews of key personnel, focusing on required qualification criteria involving integrity and financial stability. The Agency adhered to well-defined and approved investigative protocols in assembling the factual information incorporated in this report. The results of the investigation for the specific qualification criteria enunciated in SG § 9-1E-07(e)(6), and COMAR 36.10.03.02 and 36.10.06.03, as well as confirming that it is not disqualified under SG § 9-1E-07(g)(1), are summarized as follows:

1) Financial stability, integrity and responsibility

The Applicant satisfies the standards for financial stability, integrity and responsibility in connection with its Sports Wagering Facility Operator License Application.

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

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

3) Good character, honesty, and integrity

The Agency found that the Applicant possesses the requisite good character, honesty and integrity. No significant issues surfaced concerning the qualifications of the Applicant. There

were no material issues discovered pertaining to the Applicant’s record of regulatory compliance or litigation matters.

4) Sufficient business ability and experience

Crab Services was only recently formed and has conducted limited business activity since its inception. However, the principal owners of Crab Services have credible sports wagering experience as the owners of Crab Sports, which possesses a Mobile Sports Wagering License issued by the Commission and has been in operation since July 12, 2023. The Applicant possesses the requisite business ability and experience.

5) Potential Disqualifying factors

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

Applicant and Principal Entities

The Applicant and its principal entity satisfy the applicable qualification criteria under SG § 9-1E-07(e)(6) and COMAR 36.10.03.02, and 36.10.06.03 and are not disqualified under COMAR 36.10.03.02C and SG § 9-1E-07(g)(1).

Principal Qualifiers

We identified the following individuals as principals of the Applicant. Both are currently licensed by the Commission:

- Mr. Derek Baker;
- Ms. Adele Sinclair.

CONCLUSION AND RECOMMENDATIONS

The Applicant has submitted a completed Sports Wagering Facility Operator License Application, adequate proof of bond and all required fees. The Agency’s investigation has confirmed that the Applicant has sufficient financial resources and found no derogatory information regarding the Applicant’s qualifications. Based on the criteria in SG § 9-1E-07(e)(6) and COMAR 36.10.03.02 and COMAR 36.10.06.03, we conclude that the Applicant has established by clear and convincing evidence the qualifications required for a Sports Wagering Facility Operator License.

Staff recommends that the Commission find Crab Services Inc. qualified for a Sports Wagering Facility Operator License based on the provisions of the Sports Wagering Law by clear and convincing evidence.

Staff recommends the Commission entertains motions to:

1. Find that Crab Services Inc. has established, by clear and convincing evidence, its qualifications for a Sports Wagering Facility Operator License; and
2. Delegate to Staff the authority to draft the Commission's decision statement on the qualification of Crab Services Inc.