IN THE MATTER OF	*	BEFORE THE
BetMGM, LLC	*	MARYLAND LOTTERY AND GAMING CONTROL
	*	COMMISSION
Respondent		
	*	June 2025 Mobile Sports Wagering

* * * * * * * * * * * * * *

CONSENT AGREEMENT

Pursuant to the Annotated Code of Maryland, State Government Article ("SG"), §§ 9-1E-01, *et seq*. ("Sports Wagering Law"), and Code of Maryland Regulations ("COMAR") 36.10.08.05, the Maryland Lottery and Gaming Control Commission ("Commission") and BetMGM, LLC (collectively the "parties") desire to resolve this matter without a formal administrative hearing. Accordingly, the parties recite the following facts and make the following agreements:

BACKGROUND

The Commission, with the assistance of the Maryland Lottery and Gaming Control Agency ("Agency"), regulates the operation of the State's sports wagering program, and is responsible for qualifying sports wagering license applicants, issuing licenses to qualified applicants, regulating sports wagering licensees, and ensuring that sports wagering operations are conducted legally. SG §§ 9-1E-03(a), 9-1E-04.

If a licensee violates a provision of the Sports Wagering Law, a regulation promulgated by the Commission, or a directive of the Commission or the Director of the Agency, the Commission is authorized to, after a hearing, take action against a licensee that may include suspension or revocation of a license, and levying a civil penalty for each violation. SG §§ 9-1E-03(a),-08; §§

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9-1A-04(a)(3) – (8); COMAR 36.10.08. The Commission may also take other enforcement action, such as a corrective action plan, a reprimand, or imposition of a condition on a license. SG §§ 9-1A-04(a)(3) – (8), 9-1E-03(a), -08; COMAR 36.10.08. The Commission may also agree with a licensee to reach a settlement to resolve a violation. COMAR 36.10.08.05.

BetMGM, LLC is licensed by the Commission as an online sports wagering operator licensee in the State of Maryland.

By a Notice of Alleged Violations dated October 16, 2025, the Agency notified BetMGM, LLC of alleged violations of the Sports Wagering Law for the audit period of June 1, 2025, through June 30, 2025. The Agency included the monthly audit report for June 2025 indicating the violations for which the Agency is proposing a monetary penalty. The Notice of Alleged Violations asserted that this action violated the Sports Wagering Law and regulations promulgated thereunder, and that these actions were sanctionable.

BetMGM, LLC has taken corrective measures to ensure future compliance with these regulations.

The parties agree to the following terms and conditions as a means of resolving the captioned alleged violations.

TERMS AND CONDITIONS

1. This Consent Agreement is being entered into as a means of settling the alleged violations and avoiding the potential expense and inconvenience of a formal hearing.
2. There has not been a formal finding as to the merits of the allegations in the Notice of Alleged Violations. This Consent Agreement does not constitute an admission or denial by either party that a violation of law or regulation has occurred.

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3. Upon the parties' execution of this Consent Agreement, Commission staff shall submit this Consent Agreement to the Commission for review and final approval at its next meeting.
4. Upon the Commission's final approval of this Consent Agreement, and no later than 10 days after, BetMGM, LLC shall remit payment of $12,500.00 to the Commission.
5. Upon receipt of payment from BetMGM, LLC, the Commission will close these matters.
6. BetMGM, LLC will continue to take appropriate measures to ensure future compliance with these regulations.
7. If BetMGM, LLC violates a term of this Consent Agreement, the Commission may impose a sanction or penalty on BetMGM, LLC for violating the Agreement or for the underlying violation. COMAR 36.10.08.05C.
8. By entering into this Consent Agreement, BetMGM, LLC waives all rights to administrative or judicial review of the alleged violations.
9. This Consent Agreement extends only to the alleged violations referenced in the October 16, 2025, Notice of Alleged Violations. If the Commission subsequently discovers additional facts of a material and substantial nature involving any of the incidents cited in the October 16, 2025, Notice of Alleged Violations, and such facts constitute additional violations, the Commission may investigate and take any enforcement action it deems necessary as a result of the additional violations. This Consent Agreement does not prohibit BetMGM, LLC from disputing any enforcement action brought based on such alleged violations.
10. This Consent Agreement constitutes the entire agreement between the parties. No prior or subsequent understandings, agreements, or representations, oral or written that are not

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specified or referenced within this document will be valid provisions of this Consent Agreement.

11. This Consent Agreement may not be modified, supplemented or amended, in any manner, except by written agreement signed by the parties.
12. This Consent Agreement is not final and binding until it is approved by the Commission. COMAR 36.10.08.05.B(2).

IN WITNESS WHEREOF, the parties have signed this Consent Agreement as set forth below:

_____
Sarah Brennan (date)
Vice President, Compliance
BetMGM, LLC

_____
John Martin (date)
Director
Maryland Lottery and Gaming Control Agency

APPROVED:

_____
Everett D. Brownings, Sr. (date)
Chair, Maryland Lottery and Gaming Control Commission

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