
MARYLAND LOTTERY and GAMING CONTROL COMMISSION

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

COMMISSION REPORT



**In Re the Application of
BetMGM, LLC**

**Sports Wagering Facility Operator License
RENEWAL**

License Number 2021-SW-06

Report Date: June 9, 2026

“Public Report”

INTRODUCTION

Role of the Maryland Lottery and Gaming Control Commission

A Sports Wagering Facility Operation License (“operation license”) may be renewed by the Maryland Lottery and Gaming Control Commission (“Commission”) following the initial 5-year term. State Gov’t (“SG”) § 9-1E-07(c); (e); COMAR 36.10.03.06. On proper application for renewal of the operation license, the Commission shall renew the license if (1) the licensee establishes, by clear and convincing evidence, that it meets applicable license qualification requirements; (2) submits to a background investigation as required by the Commission; (3) reimburses the Commission for all costs associated with the background investigation; and (4) pays the required license renewal fee. COMAR 36.10.03.06B.

The applicant for renewal of an operation license must prove to the Commission, by clear and convincing evidence, that it remains qualified to hold an operation license. SG § 9-1E-07; COMAR 36.10.03.06. Specifically, 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. SG § 9-1E-07.

Process

The Regulatory Licensing and Investigations Division of the Maryland Lottery and Gaming Control Agency (“Agency”) conducts the required background investigation into an applicant’s qualifications. The findings of the investigation are compiled into a report which the Commission uses to determine whether the Applicant is qualified to hold a license. Staff will summarize this Executive Summary during the Commission meeting. As a public document, it is included in the Commission packets and can also be accessed on the Agency’s website alongside other meeting materials.

An applicant must submit a Sports Wagering Facility Operator License Renewal Application to the Commission as a prerequisite to being eligible for the renewal of a Sports Wagering Facility Operator License. Specifically, for renewal of the Sports Wagering Facility Operator License, the licensee must prove that it remains 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). A licensee

seeking renewal of their operation license must provide all information to the Commission that is necessary for a qualification determination as to the licensee, its principals, and its principal entities.

The Applicant

The Agency conducted a suitability background license investigation of BetMGM, LLC (“BetMGM” or the “Applicant”) in connection with its application for renewal of its Sports Wagering Facility Operator License. BetMGM, LLC was qualified for an operation license by the Commission on November 4, 2021. Its current 5-year license expires on November 3, 2026. BetMGM is the sports wagering facility operator for MGM National Harbor’s sportsbook.

INVESTIGATION INTO APPLICANT

Background

BetMGM is a Delaware limited liability company formed on July 25, 2018, and has its offices located at 200 Hudson Street, Jersey City, New Jersey. BetMGM conducts retail and online sports wagering operations in numerous U.S. jurisdictions and has operated the retail sportsbook at MGM National Harbor since the sportsbook opened on December 9, 2021.

BetMGM is currently licensed by 25 state gaming regulatory authorities, four tribal gaming agencies and commissions, and by regulatory authorities in Washington D.C., Puerto Rico and two Canadian provinces. BetMGM has submitted a Sports Wagering Facility Operator License Renewal Application with the Maryland Lottery and Gaming Control Commission.

Ownership

BetMGM is owned 50% each by GVC Holdings (USA), Inc. and MGM Sports & Interactive Gaming, LLC, which are wholly-owned subsidiaries of Entain plc and MGM Resorts International, respectively. GVC Holdings (USA), Inc., MGM Sports & Interactive Gaming, LLC, Entain plc, and MGM Resorts International have previously submitted a Sports Wagering Principal Entity Disclosure Form to the Commission.

Discussion of Financial Performance

We performed a detailed analysis of BetMGM’s operating performance and financial condition for the calendar years ending December 31, 2021 to 2025.

BetMGM's overall operating performance was generally poor, but did show steady, marked improvement over the five-year review period. As BetMGM continued to expand into new markets, its revenue grew rapidly from \$812.0 million in calendar year 2021 to \$2.75 billion in 2025. The Applicant effectively controlled its cost of revenue and operating expenses as revenue grew, resulting in substantial and steady improvement to its bottom line over time.

BetMGM incurred a net loss of \$446.0 million in calendar year 2021 which was reduced to \$290.7 million by 2024, and it realized its first net profit of \$174.6 million in 2025. As BetMGM's operating results have steadily improved, there has been a decided, positive shift during the review period to reliance on operating activities and away from financing activities to provide required liquidity and cash flows. The Applicant's operations provided positive cash flows of \$193.2 million in calendar year 2025, and this cash was used extensively to satisfy capital demands and make distributions to its members. While some weakening of BetMGM's financial condition occurred over the review period, it had cash reserves of \$179.9 million as of December 31, 2025 and appears poised to continue to generate positive cash flows from its operations moving forward, which should provide sufficient liquidity to meet its financial obligations and working capital requirements in the ordinary course of business for the foreseeable future. BetMGM also has a significant amount of borrowing capacity available to it should the need arise.

BetMGM's financial ratios and margins have generally improved over the review period and are comparable to those of its competitors. Additionally, its auditors have not expressed any concerns with its results of operations, financial condition or continuation as a going concern, and its credit report did not contain any derogatory information. There are no financial concerns with the re-licensure of BetMGM as a Sports Wagering Facility Operator.

FINDINGS

The Agency conducted a complete and thorough background investigation as authorized under the Sports Wagering Law of BetMGM 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 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 36.10.06.02 and 36.10.06.03 because BetMGM

applied for renewal of its Sports Wagering Facility Operator license 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 Renewal 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 was no material issues discovered pertaining to the Applicant's record of regulatory compliance or litigation matters.

4) Sufficient business ability and experience

The Applicant has sufficient business and experience and is not disqualified from holding a Sports Wagering Facility Operator License. The applicant has held a Sports Wagering License in Maryland since December 9, 2021.

5) Potential Disqualifying factors

The Applicant is not disqualified from holding a Sports Wagering Facility Operator License based on any of the criteria listed in COMAR 36.10.03.06, COMAR 36.10.03.02.C and SG § 9-1E-07(g)(1). The Applicant is qualified to be issued a license by the Commission.

Applicant and Principal Entities

The Applicant and its principal entity satisfy the applicable qualification criteria under SG § 9-1E-07(e)(6), COMAR 36.10.03.06, and COMAR 36.10.03.02, 36.10.06.02, and 36.10.06.03 and are not disqualified under COMAR 36.10.03.06, COMAR 36.10.03.02C and SG § 9-1E-07(g)(1).

CONCLUSION AND RECOMMENDATIONS

The Applicant has submitted a completed Sports Wagering Facility Operator License Renewal Application; submitted to a background investigation; reimbursed the Commission for

all costs associated with the background investigation; paid the required license renewal fee; and provided adequate proof of bond. 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 36.10.03.06, COMAR 36.10.03.02, 36.10.06.02 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 BetMGM, LLC qualified for renewal of its Sports Wagering Facility Operator License and, based on the provisions of the Sports Wagering Law by clear and convincing evidence.

Staff recommends the Commission entertains motions to:

1. Find that BetMGM, LLC has established, by clear and convincing evidence, its qualifications for renewal of its Sports Wagering Facility Operator License for a 5-year term in accordance with SG § 9-1E-07(c), and COMAR 36.10.03.06;
2. Find that BetMGM LLC's sports wagering facility operator license be renewed because as provided in COMAR 36.10.03.06B: BetMGM LLC has:
 - a. Established, by clear and convincing evidence, that the licensee meets applicable license qualification requirements;
 - b. Submitted to a background investigation as required by the Commission;
 - c. Reimbursed the Commission for all costs associated with the background investigation; and
 - d. Paid the required license renewal fee; and
3. Direct Staff to draft a Decision Statement and Order on the qualification of BetMGM for a sports wagering facility operator license and for BetMGM, LLC's license renewal term to commence on November 4, 2026.