

MD SB 708 – Sports Wagering_ Independent Evaluatio

Uploaded by: Brian Hess

Position: FAV



**Testimony of Brian Hess
Executive Director, Sports Fans Coalition
Before the Maryland Senate Budget and Taxation Committee
In Support of SB 708 – Sports Wagering: Independent Evaluation of Sports Wagering
Content - Required
February 25, 2025**

Madam Chair Guzzone, Vice Chair Rosapepe, and Members of the Senate Budget and Taxation Committee,

Thank you for the opportunity to testify today in strong support of SB 708 – Sports Wagering: Independent Evaluation of Sports Wagering Content - Required. My name is Brian Hess, and I serve as the Executive Director of Sports Fans Coalition, the nation's leading fan advocacy organization dedicated to ensuring that sports remain accessible, fair, and in the best interest of fans.

Founded in 2009, SFC is a national non-profit advocacy organization devoted to representing fans wherever public policy impacts the games we love. We are best known for leading the campaign to end the Federal Communications Commission's sports blackout rule, which we accomplished in 2014 despite massive opposition from the NFL and broadcast industry. We've also been on the front lines fighting massive media consolidations, equal pay for women athletes, college NIL rights, and ticketing protections for sports bettors. We also developed the Sports Bettors' Bill of Rights, which Maryland adopted in 2021.

The Sports Bettors' Bill of Rights is a set of principles that we believe should accompany all sports betting legislation. The Bill of Rights includes:

1. The Right to Integrity and Transparency
2. The Right to Data Privacy and Security
3. The Right to Self-Exclusion
4. The Right to the Protection of the Vulnerable
5. The Right to Recourse

Since Maryland legalized sports wagering, we've seen an explosion of sports betting content across media channels, social networks, and advertising platforms. While Maryland has led the nation in responsible gaming safeguards, fans still lack a critical component: an independent, objective evaluation of the content being presented to consumers. SB 708 aims to fill this gap by ensuring that sports wagering content is scrutinized for fairness, accuracy, and adherence to



responsible gaming principles. It also strengthens the first and fourth rights of sports bettors – “Integrity and Transparency” and “the Protection of the Vulnerable.”

The reality is that sports fans are being inundated with promotional offers, betting advice, and advertisements—many of which do not properly disclose risks, provide balanced information, or clearly differentiate between editorial and promotional content. Without an independent evaluator, misinformation and misleading marketing tactics can go unchecked, manipulating the marketing and creating significant harm for Maryland’s sports fans.

An independent evaluation of sports wagering content would also encourage fans to leave illegal, offshore sports books in favor of well-regulated ones by offering them something the illegal operators cannot offer:

1. **Consumer Protections** – ensuring that sports betting content is fact-based, transparent, and does not exploit vulnerable populations, including minors and individuals at risk for problem gambling.
2. **Market Integrity** – holding content creators accountable for misleading or predatory advertising practices, fostering a healthier and more responsible sports betting environment.
3. **Public Trust** – providing Marylanders with confidence that the industry is being monitored not just for financial compliance but also for ethical and responsible communication.

Sports betting is here to stay, and it is our collective responsibility to ensure that it operates in a manner that prioritizes fairness, transparency, and consumer protection. HB 922 is a necessary step to ensure Marylanders are not misled or exploited by unchecked sports wagering content. By passing this bill, Maryland can set a national precedent for responsible gaming oversight while fostering a healthier, more sustainable betting ecosystem.

I urge a favorable report on SB 708 in order to protect Maryland’s sports fans from misleading and irresponsible wagering content.

Chris Adams testimony 2025 SB 708.pdf

Uploaded by: Chris Adams

Position: FAV

SB708

Gaming - Sports Wagering - Independent Evaluation of Sports Wagering Content

SUPPORT

My name is Chris Adams, and I am the Founder of SharpRank, an independent evaluator of sports betting content.

Since legalization of online sports betting, the question of how to solve such markets has been a major topic of discussion. How to bring consumers from illegal markets to licensed ones to increase consumer protection and increase the tax revenue to the state.

How do market stakeholders combat an unlicensed company that does not fall within the jurisdiction of the licensee or the regulator? What tools are available to each to do so?

While cease and desist letters can be effective, based on testimony this committee has heard in recent days from the MLGCA regarding its budget and potential legalization of igaming, it does not appear these letters are affecting the impact of the illegal market. The tools available are simply not enough. Solutions need to adapt and innovate to match the illegal market combatant that does not have to play by the same rules.

This bill aims at exactly that – by giving the state and the licensees, the tools to reduce the illegal market, protect consumers, and increase revenues to the state.

The jurisdiction to reign in access to the illegal market already exists-- the only missing component are the tools to leverage it. The consumer interacts with and finds ways to illegal markets through content on social channels, podcasts, articles, and other mediums. Almost all of which, are U.S. based.

This bill is a catalyst to create a more robust legal market by shrinking the illegal one. It gives the MLGCA, the licensees and media/content platforms the ability to define the population, show a clean report, and actively arm them with evidence and supporting documentation to bring action against consumer access points to the illegal markets that currently go unchecked.

Understandably, the outcry from stakeholders about the illegal market is loud. This bill aims at where this jurisdiction can have the most impact. It aligns the stakeholders at a common opponent in the illegal market and arms them with a tangible solution.

Transparency and alignment in the online sports betting market will shine light on the channels directing consumers to illegal betting platforms. This will ultimately redirect consumers to the **legal** market and allow the state to capture otherwise lost revenue.

While there is no perfect answer to solving this problem, this legislation proposes a strong and necessary arrow in the states quiver to protect the consumers and increase revenues to the state.

I urge a favorable report on and strongly support the passage of Senate Bill 708.



SharpRank, Inc.
1966 Greenspring, Drive
Timonium, MD 21093

Sports Betting Consumer Protection Deck.pdf

Uploaded by: Chris Adams

Position: FAV

SPORTS BETTING CONSUMER PROTECTION

FILLING THE GAP IN THE INTEGRITY CHAIN

TIMELY MARKET NEED: INSIDER INFORMATION

During the 2023 NBA Draft, public outcry erupted after a media member associated with a Sportsbook influenced a betting market & the subsequent outcomes.


9AM DRAFT ORDER ODDS

The first two picks were labeled as nearly “sure things”.

1	Victor Wembanyama	-3000
2	Brandon Miller	-650
2	Scout Henderson	+200

12:28PM INFLUENCE/MANIPULATION

Public consumed “inside information” that Scoot will likely be selected second from a source inherently tied to a sportsbook.



Shams Charania  @ShamsCharania · Follow

Sources: Scoot Henderson is gaining serious momentum at No. 2 with the Charlotte Hornets in tonight's NBA draft. Hornets have been torn over the last week between Henderson and Brandon Miller. Team has final meetings today to settle on decision.

Last edited 12:28 PM · Jun 22, 2023

Followers: 2.1M

Employer(s):

 FANDUEL
The Athletic

12:30PM ODDS FLIPPED

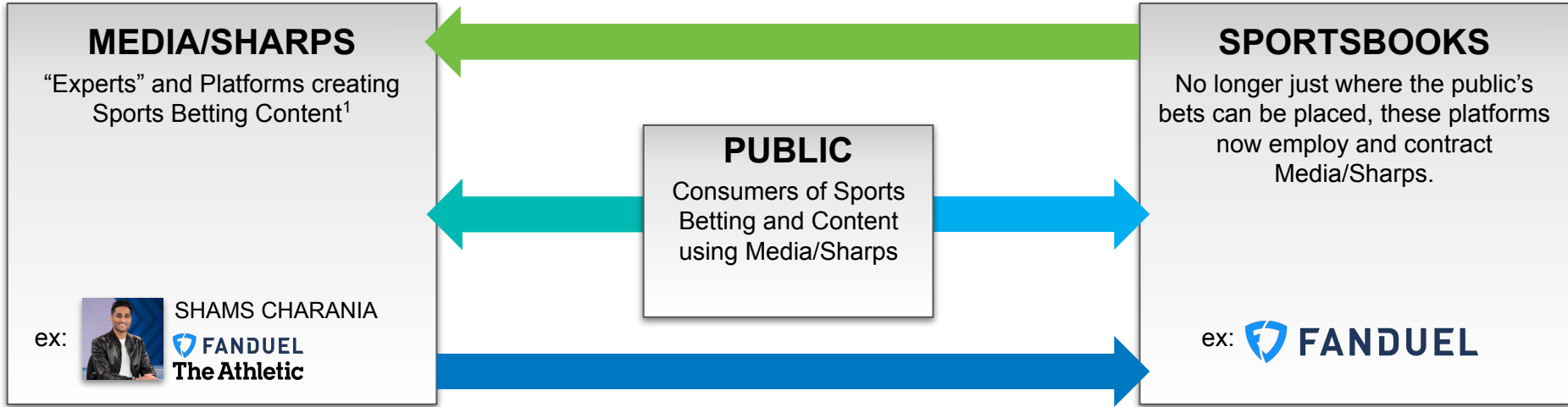
Sportsbooks made Scoot nearly a “sure thing” to go second.

1	Victor Wembanyama	-3000
2	Scout Henderson	-900
2	Brandon Miller	+480

TAKEAWAY When markets are influenced and manipulated, third party oversight becomes necessary to protect the consumer. With no regulatory enforcement platform in place, consumers pay the price. **“We will police ourselves” has not and will not work.**

HOW DID THIS HAPPEN?

When markets are influenced and manipulated, third party oversight to provide checks and balances becomes necessary to protect the consumer.



SPORTSBOOK PAYS MEDIA

for content, rights & user acquisition via CPA or revenue share on user losses.

PUBLIC PAYS MEDIA/SHARP

for content, inside information, opinions, predictions, etc. via subscriptions.

PUBLIC PAYS SPORTSBOOK

to place a bet & for content, inside information, opinions, predictions, etc.

MEDIA PAYS SPORTSBOOK

for user data and sends users to sportsbook for acquisition or revenue share payments.

¹ Predictions of sporting events outcomes in total or in part, including but not limited to, moneylines, against the spread, totals, futures, propositions (game and player), parlays, or otherwise. This could be created by in-house or affiliated content created by/for a sportsbook and could include free predictions, subscription/sold predictions, and/or affiliate or other partnership.

TIMELY MARKET NEED: MARKET MANIPULATION

When the Eagles (**PHI**) hosted the Titans (**TEN**) in the 2022 NFL season, betting behavior of **Sharps**/Influencers employed by a sportsbook was flagged as suspicious, uncovering coordinated market manipulation.

TUESDAY

Dollars flood in on **PHI**
Heavy risk exposure to sportsbook if **PHI** covers the spread.

WEDNESDAY

Sharp A flags for suspicious activity in system by picking **TEN** +6;
Upon review other Sharps (**Sharp B** & **Sharp C**) also pick **TEN** +6.

THURSDAY

“Bet with...” and “Mortal Lock”/“Free Money”/“Guaranteed” used in promotions from **Sharps A, B, C** to bet on **TEN** +6.

FRIDAY

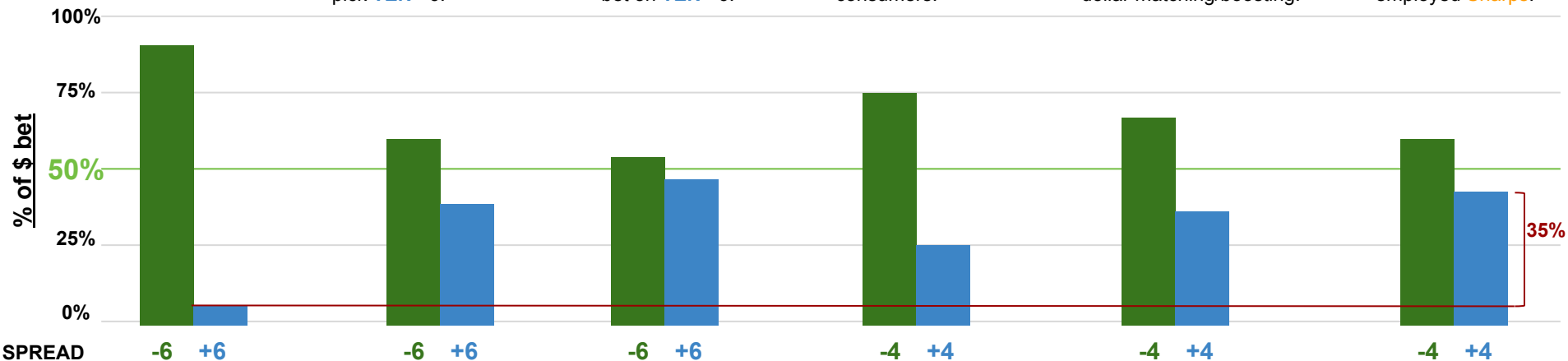
With the increase in dollars bet on **TEN** +6, the spread moves because **PHI** -4 is advantageous to consumers.

SATURDAY

The rest of the Sportsbook’s **Sharps** promote **TEN** +4 with similar “guarantee”, “bet with me” and special dollar matching/boosting.

SUNDAY

PHI covers, Sportsbook covers **35%** of their risk from the start of the week through the use of employed **Sharps**.

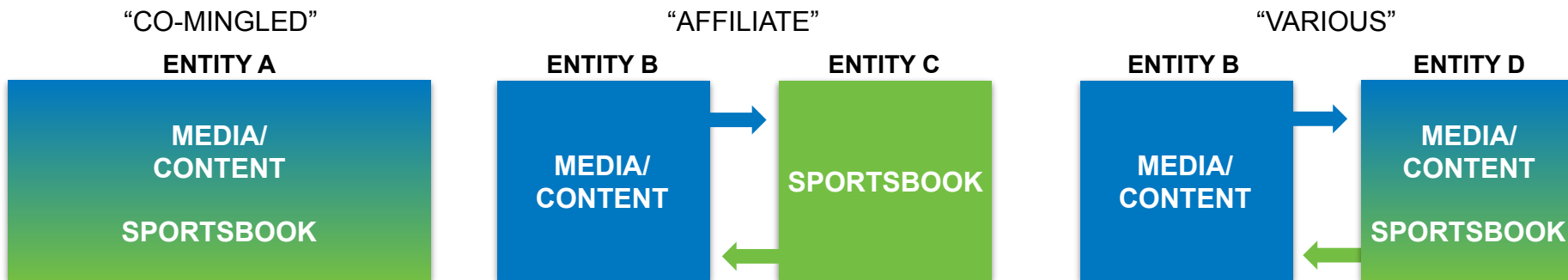


TAKEAWAY By having 50% of the dollars on either side of the bet, the sportsbook guarantees its return. Manipulation can exist because currently there is no regulatory policy to oversee this relationship. **It is not a “free market” if it can be manipulated.**

COVERAGE AREAS

Leveraging an experienced third party to validate and create transparency in the grey areas created through merging of industries, has positive long reaching effects.

SCENARIOS



COVERED “PERSONS”

“Sharps”: individuals or platforms who are financially incentivized to bring audience or engagement to a sportsbook through multiple channels by creating content. This could include but limited to, in-house content, affiliate (CPA or revenue sharing) content, social media influencers, media personalities, etc. This could also include those selling picks/predictions or actual handicappers that have relationships with sportsbooks.

“Insiders”: Individuals or platforms that have access to information that would affect betting markets. This could include but not limited to, trades, injuries, gameplans, etc.

“Traders” or **“Trading Floor”**: Individuals or platforms that set and adjust odds, offset risk, and generally oversee the oddsmaking and odds keeping functions. This could include but not limited to, in-house or outsourced trading functions.

MACGH testimony. MD Legislature.pdf

Uploaded by: Marlene Warner

Position: FAV



The Massachusetts Council on
GAMING AND HEALTH

Dear Chair, Vice Chair, and Committee Members,

I am respectfully submitting this testimony as a 24-year advocate in the field of player health in legalized gambling.

As the CEO of the Massachusetts Council on Gaming and Health we are often asked to weigh in on legislation and regulations that best provide a safety net for people who make the choice to gamble. And rarely can we be preemptive in our approach. Most of the time we are trying to solve problems that have been created after gaming was legalized and launched. Maryland is admirable to propose such a strong safety net prior to problems being created and/or exacerbated.

We talk to people who gamble every day. They do not always know why or how they got started, but they do not know how to stop. And they typically feel compelled to gamble out of their means and comfort but can't figure out how they got to that spot. And it typically is due to a complex web of external and internal factors. But even when they seek treatment or go to 12 step meetings or even talk to a peer, they continue to feel urges. That is often strongly influenced by their environment. Gambling is everywhere, but so are the people and entities that are "egging" people on with enticements, advertisements, and untruths.

But how does a regulator control and manage the ubiquitous world of gambling advertisements and influencers? It is not an easy task. Some regulators hire more staff, but that often results in a defeated team that is forever faced with gaps and new products "springing" up. Others rely on their licensees to be up front and honest, but that leaves a lot of the third party affiliates not mentioned. And even content warnings are thrown off their "game" by changes in language.

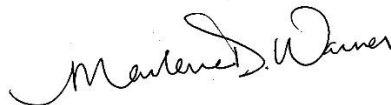
The only way to get at this and to be able to properly address it is through utilizing technology to scour the internet and log and analyze what is found. We have come to use AI for so many things, and it is most necessary for solutions to complex problems such as this. Plus, with

proper “training” it can keep up with the rapid evolution of gaming language, platforms, and graphics, as well as the tenor & purpose of conversations between individuals and on streams.

I wish that advertising bans were enough, but many US states and countries across Europe has proven that they are not. I think it will take states such as Maryland to stand up and provide the intricate and interwoven tools and resources for people, such as what Senate Bill 708 proposes, to get there. Thank you for your tenacity and leadership.

I am writing from Massachusetts because this type of leadership will have a national impact. As an advocate and a service provider, we really hope you find it possible to move this forward.

Sincerely,

A handwritten signature in black ink that reads "Marlene D. Warner". The signature is written in a cursive style with a large, looping initial "M".

Marlene D. Warner
CEO, MACGH

SB708- Senate- Senator Zucker.pdf

Uploaded by: Senator Craig Zucker

Position: FAV

CRAIG J. ZUCKER
Legislative District 14
Montgomery County



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Budget and Taxation Committee
Chair, Capital Budget Subcommittee

Chair, Senate Democratic Caucus

THE SENATE OF MARYLAND
ANNAPOLIS, MARYLAND 21401

Testimony of Senator Craig J. Zucker
Senate Bill 708 - Sports Wagering - Independent Evaluation of Sports Wagering Content
- Required
Budget & Taxation Committee
February 26th, 2025
2:00PM
Position: Favorable

Good afternoon, Chair Guzzone, Vice Chair Rosapepe, and distinguished members of the committee. It is my pleasure to testify today in support of **Senate Bill 708 - Sports Wagering - Independent Evaluation of Sports Wagering Content**. Senate Bill 708 is a reintroduction of a bill that passed the Senate unanimously last year.

With the growth of sports wagering around the country, independent, unlicensed/unpartnered sporters wagering “experts” and “influencers” have been advertising to consumers on sporting event outcomes. These outcomes include parlays, potential money lines, spreads, totals, futures, and various other outcomes without any regulations.

Senate Bill 708 is a consumer protection bill that will **require** a sports wagering licensee or sports wagering operator that advertises in the State to contract with a licensed independent evaluator to evaluate and rate the sports wagering licensee’s sports wagering content, experts, influencers, and content partners. These independent evaluators would not only protect consumers but also help distinguish legitimate betting platforms from illegal ones, resulting in a reduction of illegal gaming activities in our state.

This bill builds off legislation passed during the 2023 legislative session which authorized the Maryland Lottery and Gaming Control Commission to identify and license independent evaluators to evaluate and rate sports wagering content.

Senate Bill 708 will help protect consumers from deceptive marketing and advertising around sports wagering. For these reasons, **I urge a favorable report on Senate Bill 708**. Thank you for your kind consideration.

SB 708 - Sports Wagering - Independent Evaluation

Uploaded by: Jennifer Beskid

Position: INFO

Maryland Lottery and Gaming Control Agency

Wes Moore, Governor • John Martin, Director



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TTY users call Maryland Relay
www.mdlottery.com

DATE: February 24, 2025
BILL NO: Senate Bill 708
BILL TITLE: Sports Wagering - Independent Evaluation of Sports Wagering Content - Required
COMMITTEE: Budget and Taxation
POSITION: Information

The Maryland Lottery and Gaming Control Agency (Agency) provides the following information regarding Senate Bill (SB) 708, Sports Wagering - Independent Evaluation of Sports Wagering Content - Required

Bill Summary:

SB 708 changes the language in State Government Article (SG) § 9-1E-17 (d) from “may” to “shall”. This change would require a sports wagering licensee or sports wagering operator that advertises in the State to contract with an independent evaluator licensed under subsection (b). The independent evaluator would evaluate and rate the sports wagering licensee’s sports wagering content, sports wagering experts, sports wagering influencers, and content partners.

Background:

The Agency qualifies and then licenses a number of entities as sports wagering contractors. The Agency does not require any licensee or operator to use any particular sports wagering contractor. SB 708 would require each licensee and operator that advertises in the State to use an independent evaluator who would have to be licensed as a sports wagering contractor by the Agency pursuant to SG § 9-1E-17(b)(1) and COMAR 36.10.06.04.K.

Rationale:

Changing “may” to “shall” could be interpreted as making other provisions that exist in SG § 9-1E-17 as being contradictory.

Requiring sports wagering licensees or sports wagering operators to contract with an independent evaluator seems to necessitate that there would be some payment to the independent evaluator from the licensee. However, SG § 9-1E-17(b)(4)(ii) makes it discretionary as to whether an independent evaluator may be compensated. Additionally, SG § 9-1E-17(b)(2)(iv) - (vi) identifies how the two entities are not to be connected financially.

Additionally, while SB 708 requires the licensees to use the evaluator, other entities (media, social media, etc.) that may have broader audiences would not be required to use the evaluator, so the benefit of the service is questionable.

There are no licensed independent evaluators known to the Agency and to date, there have not been any entities that have applied to the Commission to become an independent evaluator. Furthermore, the Agency is aware of only one entity that engages in this service.

The Agency submits this information for your consideration as you debate SB 708.