



To: Chair Vanessa Atterbeary and Members of the House Ways and Means Committee
From: MGM National Harbor
Date: February 10, 2025
Re: House Bill 17 (Internet Gaming -- Authorization and Implementation)
Position: Support with Amendments

My name is Rick Limardo, Senior Vice President of Government Affairs for MGM Resorts International, a global entertainment company with national and international destinations featuring best-in-class hotels and casinos.

I appreciate this opportunity to testify in support of HB 17 with amendments, and would like to thank Chair Atterbeary for introducing this bill and for her leadership on this timely conversation about iGaming.

As detailed in this testimony, there is an incredible opportunity for Maryland to modernize its gaming options, meaningfully contribute to solving the State's \$3 billion budget deficit without increasing the table games tax, and expand the existing commercial gaming market by nearly \$2 billion in annual gross gaming revenue¹ over the next several years by legalizing iGaming, a form of online casino gaming that has become a popular form of entertainment offered by casino operators to adults of legal age in regulated iGaming states. I appreciate the opportunity to testify today on behalf of MGM and hope the information shared will assist the committee as you deliberate over policy measures that are crucial to the continued evolution of Maryland's gaming industry.

The MGM Resorts portfolio encompasses 31 unique hotel and gaming destinations globally, including one of the most recognizable resort brands here in Maryland – MGM National Harbor. The Company's 50/50 venture, BetMGM, offers U.S. sports betting and online gaming through market-leading brands. BetMGM is currently licensed in Maryland and operates both statewide online sports betting as well as our retail sports book located inside MGM National Harbor.

Maryland's commercial brick-and-mortar casino gaming industry, of which MGM National Harbor is proudly a part, continues to be a significant economic engine for the state through robust job creation and the generation of substantial tax revenues that fund important public priorities, including education.

Collectively, Maryland's six commercial casinos, have generated nearly \$6 billion in economic

¹ *The Potential Economic Impact of Legalizing iGaming on Casino Revenues in Five States*, Analysis Group, finding in total, land-based and iGaming revenues combined are projected to grow from \$2.0 billion in 2024 to \$3.9 billion in 2029 (a 91.7% increase). This large increase is attributable to multiple factors, including Maryland's large population for iGaming, continued growth potential for Land-based casino revenues, and its demonstrated large sports betting revenues.



impact²; creating more than 15,000 direct jobs to date; and produced \$824 million in positive tax impact in FY 2024³.

Since the creation of the Maryland Education Trust Fund (ETF), the state's commercial casinos contributed \$6.1 billion to the fund. **Since opening in December 2016, MGM National Harbor contributed more than \$1 billion to the ETF.**

MGM Resorts is deeply committed to supporting the vitality and growth of the communities in which we operate. At MGM National Harbor, approximately 47% of our more than 3,200 employees are local residents of Prince George's County and/or veterans, reflecting our dedication to creating opportunities close to home. Our mission is rooted in making lasting, positive impacts on the local area through job creation, business partnerships, and community involvement that support the people and organizations in the communities we serve.

Our commitment to the community is evident – since the inception of our *Community Benefits Agreement* in 2014, MGM National Harbor has contributed more than \$8 million in financial assistance and in-kind support to local non-profit organizations. Since opening in 2016, our team members have collectively volunteered more than 30,000 hours, contributing their time and talents to local organizations that address critical issues and support the unhoused, veterans, low-income families, youth, and environmental causes.

The land-based casino gaming industry has been a significant economic driver that has positively impacted the lives of many Marylanders – whether they be our employees, our local suppliers, our community partners, or residents who have benefited from the tax dollars that our industry generates. It is in this context that we vocalize our strong support of efforts to legalize iGaming, which we believe **will increase revenue growth for existing casino gaming, create meaningful new tax revenue to fund critical state programs, and modernize the state's gaming industry.**

iGaming – casino-style slots and table games offered on an online platform – presents a significant economic opportunity not only for industry participants but also for the State in terms of incremental tax revenues, job creation, and diversification of the land-based casino industry. **Legal and operational in eight states, including in Maryland's neighboring states of Pennsylvania, West Virginia, and Delaware, full-scale iGaming is an \$8.2 billion⁴ industry as of 2024 and growing.** The industry produces substantial tax revenues in each respective jurisdiction.

We recognize that there are some who may be concerned about the effect of iGaming legalization on land-based operations. **Based on our experience in two iGaming states – New Jersey and Michigan – where MGM Resorts currently operates both retail and online casino gaming, there are complementary synergies between our retail casino properties and iGaming that have allowed us to enhance the customer experience, and build business, with both.**

² *State of Play*, American Gaming Association. As of December 31, 2023.

³ *Fiscal Year 2024 Annual Summary*, Maryland Lottery and Gaming.

⁴ Eilers & Krejcik Gaming, U.S. Online Casino Monitor, January 2025.



For example, we have found that a significant percentage of iGaming “omnichannel” customers (i.e., patrons with both land-based casino activity and online casino play) first interacted with our online gaming platform *prior to* visiting an MGM Resorts retail property in those two states, indicating an opportunity to leverage online gaming to convert digital gaming customers to retail as well as increase the frequency of land-based casino visitation. In addition, omnichannel customers with both land and digital casino activity have higher gaming spend vis-à-vis a “single-channel” patron, which means that iGaming grows the overall revenue pie, thus positively impacting the overall state gaming tax revenue. In Maryland alone, the tax revenue generated by iGaming would be at least \$450 million annually at market maturity (i.e., five years from market launch).

Additionally, iGaming legalization ensures that the gaming entertainment we offer – just like any other entertainment product – stays relevant and continues to evolve with technology and modern-day delivery methods. We are particularly excited about an emerging but fast-growing segment of iGaming called online “live dealer” games, which are live table games conducted in real time either at a studio or at a land-based casino that are livestreamed on an iGaming platform, allowing patrons to participate as those games occur in studio or on the casino floor. Live dealer is a prime example of how the synergies between retail and online can make gaming entertainment more innovative, interactive, and fun while creating new opportunities for Maryland businesses.

Based on our experience, our digital gaming customer database is younger, compared to our overall customer database. iGaming can give retail casino operators a new way to (1) interact with and engage their customers digitally wherever they are and (2) introduce a new customer demographic to land-based casino gaming.

These anecdotal observations of our experiences in New Jersey and Michigan are further substantiated by several empirical studies that have examined the interplay between retail and online casino. **A recent study by Eilers & Krejcik concluded that 1) online casinos have a positive impact on land-based casino revenue; 2) online casinos attract different customers versus land-based casinos; and 3) the typical state would boost casino revenue after introducing iGaming.⁵**

To repeat: We have over a billion dollars invested here in Maryland, and most assuredly, we would not jeopardize that investment if we thought iGaming would compete or negatively impact our business or employees. We know that iGaming, whether online slots, table games or live dealer, is a different form of entertainment, and our land-based venues will always offer an experience that cannot be replicated on a computer.

While we appreciate and strongly support the intent of HB 17 to legalize and regulate iGaming, we are concerned by certain provisions in the bill relative to licensure and taxation.

First, we support a licensure framework that tethers iGaming licenses to the incumbent land-based

⁵ “Comparing Online and Land-Based Casino Gaming,” Eilers & Krejcik, February 2024.



casino gaming operators who have fostered and maintained deep ties to the community; have invested billions of dollars into the state; and continue to generate jobs, economic development, and tax revenues for the state. MGM National Harbor, as outlined above, is committed to supporting our communities and businesses at the state and county level.

Additionally, as a highly regulated gaming company MGM Resorts must prove that we are suitable for the privilege of holding a license to operate the very same casino games that would be offered on an iGaming platform. Our gaming license in any jurisdiction is dependent not only upon the integrity with which we operate in that market, but in all markets. As a company with several destination resorts in the country, we have billions of dollars of investment that depend on our ability to conduct our business consistent with the strongest regulatory standards to which we are subject.

To put it simply, MGM is engaged in a race to the top. This race to the top is evident in every aspect of our business, and we incorporate the following principles into our iGaming product:

- We know our customer. Our online gaming partner, BetMGM, creates all our technology in-house and in a manner that reflects the regulatory requirements of each jurisdiction in which we operate.
- A customer must create an account before they are permitted to gamble on our mobile app or Internet site. When verifying our customer accounts, we use a sophisticated multi-factor identity verification process that uses a customer's name, Social Security Number, and date of birth to confirm identity across different databases and that the customer is as purported and of legal age. This is the same know-your-customer protocols we use for sports betting accounts created in the state.
- We invest in responsible gaming. MGM Resorts is an industry leader in responsible gaming in the brick-and-mortar environment, and we carry that expertise into the mobile environment. We, along with BetMGM, continue to develop protocols that encourage responsible gaming on the front-end and use a series of markers to identify when a player may be exhibiting signs of problem gambling. We offer messaging and interaction with players, self-exclusion lists, and wager limits as examples of ways that players may limit their engagement.

That is why we believe any iGaming licensing framework should recognize those who have made existing investments in the state as well as the most suitable and experienced operators in the market.

Second, the most entrenched competition that regulated iGaming operators would face in a legalized iGaming market would be the existing illegal offshore operators who pay no taxes, have no compliance overhead costs, do not invest in responsible gaming tools, and thus can invest heavily in marketing to drown out the legal competition. **We believe that a reasonable tax rate is critical to stamping out**



unregulated online offshore operators and to recognize the already significant tax revenues⁶ that incumbent casino gaming operators already produce for the state.

While you may be familiar with offshore online gaming operators like Bovada that continue to capitalize on existing demand for iGaming and the lack of a legal, regulated alternative, we also would like to draw the committee's attention upon the more recent proliferation of online sweepstakes casinos. These platforms, many of which are *onshore with headquarters in the United States and whose apps are readily available on major online stores for download*, take advantage of legal loopholes around sweepstakes and provide customers the ability to play casino games or substantially equivalent games with similar statistical odds of winning. Advertised as "social casino games," these platforms are anything but and run multi-million-dollar marketing campaigns, including through social media and celebrity influencers, that often target teens and young people. Based on their public securities filings, the online sweepstakes industry over the past four years has grown at an astonishing compound annual growth rate (CAGR) of 85 percent, and this year expects to see \$11.4 billion in player purchases and \$4 billion in net revenue. Despite their rapid proliferation, this illicit sweepstakes industry is not subject to any state gross gaming tax; does not offer any meaningful responsible gambling tools; and does not employ sophisticated KYC, identity- or age-verification processes – to the contrary, most of these platforms allow prospective customers to simply check a box and self-certify that they are of gambling age.

In our view, the continued and growing prevalence of the illicit online gaming market, including this latest crop of illegal online sweepstakes operators, further necessitates passage of a reasonable iGaming legalization and regulatory framework in the state of Maryland.

We look forward to working with Chair Atterbeary and the Committee on developing a framework that legalizes iGaming in a responsible way that creates opportunities for all Marylanders while recognizing the current contributions of the brick-mortar casino industry.

Thank you very much, and I welcome any questions you may have on this important and timely topic.

Regards,

Rick Limardo
Senior Vice President, Government Affairs
MGM Resorts International

⁶ The blended casino gaming tax rate in the state is 41 percent, which is second highest in the country.