



**March 5, 2026**

**House Bill 1255 – Expansion of Commercial Gaming – Internet Gaming Referendum**

**House Ways & Means Committee**

**Position: SUPPORT W/AMENDMENT**

Chair Wilkins, Vice Chair Feldmark, and Members of the Committee:

High Roller Technologies respectfully submits this testimony in support with amendments of House Bill 1255, which would authorize a constitutional referendum to allow Maryland voters to determine whether to expand commercial gaming to include internet gaming (iGaming).

While we support the referendum concept, we respectfully urge the Committee to adopt technical amendments to ensure that, if approved by voters, the resulting iGaming market is competitive, inclusive, and structured to maximize innovation, consumer choice, and long-term state revenue. Additionally, it is important that the language in the referendum parities with any language included in legislative initiatives authorizing iGaming.

As currently drafted, the enabling framework appears to limit or constrain eligibility for internet gaming licenses in a manner that could restrict participation primarily to certain existing license holders. If the statutory language adopted prior to referendum approval narrowly defines who may apply for or receive an iGaming license, Maryland risks establishing a closed or semi-closed market structure.

This is particularly significant because once voters approve a constitutional expansion of gaming, the scope of that authorization is tied to the language presented to them. If eligibility categories are drawn too narrowly at the outset, expanding them later could require additional legislative action (and potentially another referendum) creating delay, uncertainty, and lost economic opportunity.

Maryland has already seen how competitive frameworks in sports wagering have encouraged innovation, technology integration, and broader economic participation. A similar approach in iGaming would help ensure the State captures the full economic potential of this emerging sector and allows for participation from qualified entities and equal opportunities for state-based Minority Business Enterprises (MBEs).



To ensure the referendum achieves its intended purpose and avoids unintended structural limitations, we respectfully recommend:

1. ***Clarification of Eligible Applicants***

Amend the enabling language to expressly authorize the State Lottery and Gaming Control Commission to issue internet gaming licenses to a broad class of qualified applicants, including but not limited to:

- Existing video lottery or casino operators
- Sports wagering licensees
- A principal entity of a holder sports wagering facility described under Section 9-1E-06(A)(1)(I)(2) that has been qualified under COMAR 36.10.02.10
- Technology platform providers meeting regulatory suitability standards

2. ***Open Competitive Licensing Structure***

Provide that license issuance is not restricted solely to existing land-based gaming operators

3. ***Regulatory Flexibility***

Ensure that the Commission retains authority to adopt regulations establishing suitability, financial integrity, cybersecurity, and responsible gaming standards applicable to all applicants, without unnecessarily limiting market entry categories.

4. ***Avoidance of Future Referendum Barriers***

Include language clarifying that the General Assembly may refine licensing structures within the scope of the constitutional authorization without requiring additional referenda solely to expand applicant eligibility.

High Roller Technologies strongly supports allowing Maryland voters to decide whether to authorize internet gaming. However, it is equally important that the framework accompanying that decision fosters an open, competitive, and future-ready market.

By clarifying eligibility and ensuring a level playing field at the outset, the General Assembly can protect the integrity of the referendum process while maximizing economic opportunity, innovation, and long-term revenue for the State.

We respectfully urge the Committee to adopt amendments consistent with these recommendations and to advance HB1255 with a competitive and inclusive implementation structure.

Thank you for your consideration.

**For more information call or email:**

Therese M. Hessler | 301-503-2576 | [therese@ashlargr.com](mailto:therese@ashlargr.com)