

# CAESARS<sup>®</sup> SPORTSBOOK

July 12, 2023

*Via Electronic Mail*

State of Vermont Department of Liquor and Lottery  
**Attn: Chair Martin Manahan**  
**Attn: Commissioner Wendy Knight**  
1311 Route 302, Suite 100  
Barre, VT 05641

*Re: Vermont Sportsbetting*

Chair Manahan and Commissioner Knight,

On behalf of Caesars Sportsbook, we would like to thank the Department for extending the opportunity to review and provide feedback on the proposed Vermont sportsbetting regulations. We appreciate the collaborative nature on the development of the regulations and look forward to bringing sports betting to the state of Vermont.

Please find below the suggestions from our operating teams. Let us know if we can provide any additional clarification, feedback or insight.

## **Part II Standards for Sports Wagering**

### **Comment re: Section 1.2**

**1.2.** A Sportsbook shall not offer wagering on:

(c) Any occurrence of injuries or penalties;

**Comment:** Some sports such as soccer have penalty shootouts in the event of a tie which will determine the winner of a game/tournament/championship. If the intention is to not offer wagers pertaining to player injuries, we suggest this is section to be modified to "...or penalties resulting from player injuries" or something to this effect.

### **Comment re Section 5.2**

**5.2.** The house rules must address the following items regarding Sports Wagers, at a minimum:

(a) Types of Sports Wagers accepted;

(b) Minimum and maximum Sports Wagers;

**Comment:** Caesars has not outlined maximum and minimum sports wagers in the jurisdictions in which it operates. This is due to increasing maximum wagers on a discretionary basis. Before this decision is made, our team reviews the customer's account and any associated risks.

## **Part IV Sports Wagering Comments**

### **Comment re: Section 7.3**

**7.3.** When a Sports Wagering Account's lifetime deposits exceed \$2,500, and every year thereafter, the Sportsbook shall prevent any wagering until the player immediately acknowledges that the player has met the deposit threshold and may elect to establish responsible gaming limits or close the account, and the player has received disclosures from the Sportsbook concerning problem gambling resources.

**Comment:** As we offer customers the ability to self-limit, and will comply with the proposed Vermont regulations in this area, we suggest the removal of this requirement.

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## Part VII Advertising and Marketing

### **Comment re: Section 1.1(e)**

**1.1.(e)** Do not target Underage Persons, other Ineligible Persons, individuals with gambling problems, or other vulnerable individuals.

**Comment:** Other vulnerable individuals is not defined. Suggest removal of that term or define the term.

### **Question/Comment re: Section 5.0**

This section addresses advertising and marketing.

We suggest clarifying the process of submitting an advertising and marketing plan and recommend adding specific language, such as: “Operator shall submit an **annual** advertising and marketing plan to the Department.... “

Additionally, will there be a requirement to submit advertising/promotional advertisement prior to publishing.

### **Question re: Section 6.2**

**6.2** No promotional inducement, bonus or credit shall exceed a value set by the Department.

**Comment:** This sort of value is not typically set by the regulatory body in the jurisdictions in which we currently operate. We recommend removal of this language.

We can be available at your convenience for further discussion if helpful. Again, appreciate the opportunity to provide feedback and we look forward to continued collaboration.

Sincerely,

*Lisa Rankin*

Lisa Rankin  
Vice President Compliance and Licensing