

**Testimony of the iDevelopment and Economic Association (iDEA)
Submitted to the Joint Committee on Consumer Protection and Professional Licensure
In Support of H. 332 and S. 235**

June 23, 2025

Chairman Chan and Members of the Committee:

On behalf of the iDevelopment and Economic Association (iDEA), thank you for the opportunity to submit written testimony in support of H. 332 and S. 235, legislation that would authorize and regulate online casino gaming and poker, collectively referred to as iGaming, in the Commonwealth of Massachusetts.

The iDevelopment and Economic Association (iDEA) is the premier trade association representing the regulated online gaming ecosystem in the United States. Our members include sportsbook and iGaming operators, technology and compliance vendors, payment processors, geolocation and data security providers, and other critical partners who support safe, secure, and accountable online gaming. Collectively, we bring decades of experience assisting lawmakers and regulators in designing and maintaining effective, transparent, and consumer-focused gaming markets both domestically and abroad.

We applaud the sponsors of H. 332 and S. 235 for taking a thoughtful and forward-looking approach to legalizing iGaming. The proposed legislation will enhance consumer protections, generate new and sustainable tax revenues for Massachusetts, and support the long-term competitiveness of the Commonwealth's gaming industry.

The Benefits of a Well-Regulated iGaming Market

Enhanced Consumer Protection

Today, any Massachusetts resident with an internet connection can access illegal offshore casino websites that operate outside the reach of Massachusetts law. A recent report from Rightlander in coordination with iDEA member, GeoComply (a supplier licensed by the Massachusetts Gaming Commission), found that residents of the Commonwealth placed an estimated **\$2.5 billion in wagers** with illegal online casinos over the past year, resulting in **\$800 million in lost revenue to illicit operators**. (see **Appendix One**)

Even more concerning, these offshore sites—such as IgnitionCasino.eu, DuckyLuck.ag, and WildCasino.ag—frequently appear at the top of Google search results for “online casino” and “real money slots.” As shown in the Rightlander data, Massachusetts residents conducted more than **1.5 million visits per month** to illegal casino sites and performed **over 200,000 monthly searches** for online casino and poker content. Many consumers may not even realize they are engaging with unregulated, illegal operators.

These sites offer no age verification, no player protections, and no recourse for consumers. By contrast, legal iGaming platforms are strictly regulated, require age and identity verification, and include robust responsible gaming tools, anti-fraud protections, and data security protocols.

Massachusetts can’t afford to let this illicit market flourish. Regulation, coupled with enforcement is an effective way to protect consumers, ensure fair play, and hold operators accountable.

In Michigan, strict regulatory enforcement empowered by the state’s legalization of iGaming has successfully curtailed illegal operators. Recent research conducted by Rightlander, again in coordination with GeoComply, demonstrates the effectiveness of strong regulation paired with active enforcement. The charts provided in **Appendix Two** show that since **legalization and aggressive enforcement against un-regulated online gaming** from the state’s gaming regulator and law enforcement there has been a **sharp decline** of people within Michigan **seeking out illegal operators** and accessing those platforms within the state of Michigan.

Responsible Gaming Leadership

Leading iGaming operators are deeply committed to responsible gaming and player protection, utilizing **advanced technologies and proactive strategies to identify and mitigate problem gambling**. Operators employ sophisticated behavioral analytics and machine learning to track dozens of behavioral markers, such as deposit patterns and gaming frequency, to detect early signs of risk. These data-driven interventions are personalized, significantly **increasing the adoption of responsible gaming tools** like deposit limits and self-exclusion.

The industry is actively working to remove the stigma around responsible gaming tools by promoting them as standard features integral to everyone’s gaming experience—similar to everyday safety measures like seatbelts. Operators ensure comprehensive staff training, strict oversight from senior-level in-house responsible gaming teams, and thorough regulation of marketing practices.

Responsible gaming teams proactively review transaction and communication records to initiate interventions that range from offering supportive resources and account management actions to conducting financial assessments to prevent potential harm.

Further strengthening player protection, operators collaborate closely with respected organizations such as the National Council on Problem Gambling, Gamblers Anonymous, Birches Health, and Kindbridge, providing easily accessible and free clinician-led treatment options for players in need.

Additionally, the industry voluntarily adheres to stringent responsible gaming standards through organizations like iDEA and the Responsible Online Gaming Association (ROGA), setting industry-wide best practices that exceed regulatory requirements. These proactive efforts underscore the industry's commitment to maintaining a safe, sustainable, and enjoyable gaming environment for all players.

Economic and Fiscal Impact

Legalizing iGaming is not just about better consumer protection—it's also a smart economic policy.

States like New Jersey, Michigan, and Pennsylvania have shown that regulated iGaming can generate **hundreds of millions of dollars annually** in tax revenue. For Massachusetts, similar estimates project **substantial new revenue** without increasing burdens on existing land-based operators or taxpayers. Based on a study conducted by *Vixio*¹, Massachusetts could conservatively generate approximately **\$260 million annually** at the tax rates proposed under H. 332 and S. 235 with that revenue figure growing as the market reaches maturity within five years.

iGaming will also create new jobs across compliance, customer service, fraud prevention, technology, and live dealer operations. As we've seen in other states, the ripple effects of iGaming extend to economic development, workforce expansion, and innovation in digital gaming technology.

Supporting the Brick-and-Mortar Industry

There is clear evidence that iGaming does not harm land-based casinos—in fact, it helps them grow. In Pennsylvania, where online gaming launched in 2019, **retail slot and table game revenue has increased by 13.25% and 25.17%**, respectively, over the past five years. At the same time,

¹ Vixio/Light and Wonder; [US iGaming State Tax Revenue Potential](#); August 2024

land-based casinos have added jobs and opened new properties, even while online gaming flourished. For more analysis please review the Pennsylvania Case Study in **Appendix Three**.

Online and retail gaming serve different consumer preferences and reinforce each other through loyalty programs, cross-promotions, and brand extensions. Massachusetts' existing casino licensees are well positioned to use iGaming to enhance their offerings, drive engagement, and attract new customers.

Regional Competitiveness

Massachusetts is surrounded by states moving forward with iGaming. **Connecticut and Rhode Island already offer legal online casino gaming**, and **New Hampshire, New York** have actively considering iGaming legislation, and **Maine's legislature recently passed a bill** that has been sent to the Governor. As the digital gaming map fills in across the region, Massachusetts risks losing more and more tax revenue and market share to its neighbors.

Legalizing iGaming is necessary to keep Massachusetts competitive, modernize its gaming infrastructure, and retain revenues that are currently flowing out of state—or worse, into the illegal offshore market.

Leveraging Existing Infrastructure

Massachusetts has already built a secure and effective regulatory model for mobile sports betting. The same technologies—such as geolocation, identity verification, and responsible gaming oversight—can be applied directly to iGaming. The Massachusetts Gaming Commission is well positioned to extend its regulatory authority and expertise into online casino and poker.

Suggested Refinements to the Proposed Legislation

We are generally very supportive of the approach taken by H. 332 and S. 235, including the tax structure, licensing framework, and the commitment to a strong regulatory environment.

However, we respectfully recommend a modest expansion of market access to ensure sufficient competition and consumer choice:

- **Increase the permitted skins per tethered license** from two to three.
- **Double the number of untethered licenses** from four to eight.

This would create up to **17 iGaming access points** in Massachusetts—a number well within the capacity of a market this size. While the sports betting market currently supports seven operators, iGaming appeals to a broader demographic and sustains higher engagement levels. In markets like Michigan and New Jersey, we’ve seen that more competition leads to better outcomes for consumers and higher overall revenues for the state.

We believe that Massachusetts is well positioned to support a vibrant and diverse iGaming ecosystem and that these changes would help achieve that goal.

Conclusion

Massachusetts has an opportunity to lead on consumer protection, innovation, and fiscal responsibility by legalizing online casino gaming and poker. H. 332 and S. 235 provide a strong framework for achieving these goals.

By regulating what is already happening in the shadows, the Commonwealth can protect its residents, generate new revenue, support existing gaming businesses, and stay competitive in a rapidly evolving digital market.

Thank you for considering our views on this important issue. We welcome the opportunity to work with the Committee and stakeholders as this legislation advances.

Respectfully submitted,

John A. Pappas

State Advocacy Director

iDevelopment and Economic Association (iDEA)

Appendix One



Illegal Online Casino Activity in Massachusetts

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|---|--|----------------|---|--|---------------|
| 1 | Wagers placed at illegal online casinos by Massachusetts citizens. | \$2.5bn | 4 | Estimated loss in tax revenue to the state of Massachusetts. | \$260m |
| 2 | Estimated monthly visits to illegal online casinos from Massachusetts. | 1.5m | 5 | Top Google positions for 'casino' keywords by illegal online casinos | 14% |
| 3 | Estimated revenue lost to wagering at illegal online casinos in Massachusetts. | \$800m | 6 | Estimated monthly ads served by illegal online casinos in Massachusetts. | 1.2m |

Estimates based on American Gaming Association data, Massachusetts population data, and Google search data. Data analyzed from the past 12 months to May 2025.

Display Advertising Spend in Massachusetts	Display Ad Network	Total illegal online casino spend with ad networks for past 3 months
	AdsTerra	\$250,000
	PopAds	\$5,000
	Coinzilla	\$3,500
	TribalFusion	\$1,000
	Criteo	\$1,000

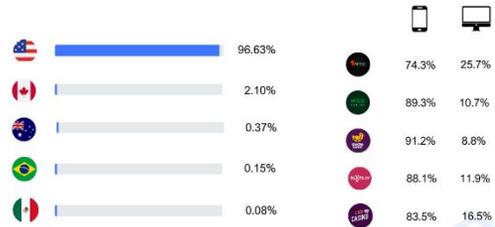
Figures calculated using a combination of partner tools and Google search

Visits to illegal casino websites from Massachusetts within the past 3 months



Data provided by Rightlander and partner sources

Visitors by country and device distribution in last 3 months



Data provided by website traffic analysis software

Selected keyword searches in Massachusetts during May 2025

Keyword	Avg Monthly Searches	Keyword	Avg Monthly Searches
casino	50,000	casinos games	5,000
online casino	50,000	ducky luck	5,000
casinos	50,000	online casinos real money	5,000
ignition casino	5,000	slot machine	5,000
wild casino	5,000	free slots	5,000
slots lv	5,000	online blackjack	5,000
cafe casino	5,000	internet casinos real money	5,000

Data collected from Google search. These figures are estimates based on keyword popularity.

Appendix Two



Data provided by tools that aggregate Google Search data. Figures are based on estimates supplied by Google and do not include a wide range of variations, typos and other similar searches.



Data provided by analytics tools that track visitors through multiple platforms which include search engines, third party sites, social media, and ad networks.

Appendix Three

iGaming Impact on Land-Based Gaming Revenue and Jobs A Pennsylvania Case Study

Year	Slot Machine Revenue	Table Games Revenue	iGaming Revenue	Sports Wagering Revenue	VGT's Revenue	Fantasy Sports Contests	Total Gaming Revenue
2014	\$2,319,534,380	\$749,543,217					\$3,069,077,597
2015	\$2,365,651,659	\$808,137,112					\$3,173,788,771
2016	\$2,360,184,122	\$853,238,055					\$3,213,422,178
2017	\$2,336,212,902	\$890,704,254					\$3,226,917,156
2018	\$2,369,885,203	\$878,796,174		\$2,516,589		\$15,309,615	\$3,266,507,581
2019	\$2,363,085,678	\$903,594,181	\$33,599,749	\$84,112,967	\$2,329,540	\$25,872,124	\$3,412,594,239
2020	\$1,355,924,785	\$504,309,266	\$565,776,908	\$189,703,465	\$16,647,898	\$21,148,707	\$2,653,511,029
2021	\$2,287,529,465	\$924,902,965	\$1,112,855,937	\$340,113,160	\$39,852,039	\$29,298,635	\$4,734,552,201
2022	\$2,390,757,300	\$990,568,468	\$1,364,392,468	\$401,208,108	\$42,079,447	\$22,329,896	\$5,211,335,687
2023	\$2,463,698,452	\$971,742,564	\$1,741,832,079	\$458,616,339	\$41,237,349	\$20,091,332	\$5,697,218,115
2024	\$2,447,354,419	\$937,479,260	\$2,181,669,449	\$510,716,858	\$41,525,888	\$18,668,580	\$6,137,414,455

*Source: Pennsylvania Gaming Control Board 2024 Revenue Report; January 21, 2025

Slot Machine Revenue

- 2014–2018 (Total): \$11,751,468,266
- 2019–2024 (Total, including 2020): \$13,308,350,099
- Percent Difference: +13.25%

Table Games Revenue

- 2014–2018 (Total): \$4,180,418,812
- 2019–2024 (Total, including 2020): \$5,232,596,704
- Percent Difference: +25.17%

Key Takeaways:

To assess the impact of iGaming on Pennsylvania's retail gaming market, we analyzed the revenue numbers from the five years before iGaming's introduction (2014–2018) and compared them to the five years following its introduction (2019*–2024). This approach provides a balanced comparison, even accounting for the challenges posed by the COVID-19 pandemic in 2020, which significantly disrupted retail gaming revenues.

The results show that **retail table games and slot revenues have increased considerably during the five years since iGaming was introduced, despite the unprecedented challenges of the pandemic year.**

- **Retail slot revenue** grew by **13.25%** between the two periods, rising from \$11.75 billion (2014–2018) to \$13.31 billion (2019–2024). This demonstrates that slots, a cornerstone of the retail casino industry, have remained strong and even grown in the presence of iGaming.
- **Retail table game revenue** experienced an even more remarkable increase, growing by **25.17%** from \$4.18 billion (2014–2018) to \$5.23 billion (2019–2024). This substantial growth highlights the continued appeal of table games and their ability to thrive alongside iGaming.

This growth occurred alongside the expansion in the state's land-based gaming footprint. Since 2018, **five new casinos** (two full casinos and three mini/satellite casinos) have opened in Pennsylvania, further contributing to the increased revenue from retail gaming. This demonstrates that iGaming and land-based casinos are not competitive but are complementary. The simultaneous growth of iGaming and new brick-and-mortar venues reinforces the idea that **land-based and online gaming can coexist and thrive, creating a more robust and diverse gaming ecosystem.**

The employment impact further underscores this complementarity. According to publicly available data from the Pennsylvania Gaming Control Board (PGCB)² **more than 1,000 new jobs have been added at land based casinos over the past three fiscal years (FY21/22 to FY23/24)**. This does not include jobs associated with “live dealer” studios located within Pennsylvania, which are not included in the PGCB employment figures. It is estimated that more

² Pennsylvania Gaming Control Board Annual Reports; [2021-2022](#); [2022-2023](#); [2023-2024](#).

than 1,000 jobs are directly tied to “live dealer” iGaming in Pennsylvania. Additionally, the PGCB’s job board³ highlights active recruitment efforts by casinos across the state, with **hundreds of full-time and part-time opportunities available**. These positions range from dealers and table games supervisors to roles in restaurants and other non-gaming amenities that are essential to the in-person casino experience.

Finally, the combination of **iGaming and sports betting** has driven **record-breaking gaming revenues** for the state. Total gaming revenue grew from **\$3.27 billion in 2018** to **\$6.14 billion in 2024**, an increase of over **87%**. iGaming and sports make-up the lion's share of this growth. The availability of these new digital gaming channels has contributed to **record tax revenues from gaming**, benefiting Pennsylvania's economy and public services.

³ Pennsylvania Gaming Control Board [Casino Employment Opportunities](#).

*iGaming launched in Pennsylvania on July 15, 2019. The first online casinos to launch were Parx Casino, Hollywood Casino, and PlaySugarHouse.