



Testimony of Rick Limardo
MGM Northfield Park
Ohio General Assembly
House Finance Committee

Mr. Chairman and members of the committee, my name is Rick Limardo, Senior Vice President of Government Affairs for MGM Northfield Park, a global entertainment company with national and international destinations featuring best-in-class hotels, casinos and here in Ohio, racinos.

I appreciate this opportunity to testify in support of iGaming and would like to thank Chair Stewart for his leadership on this timely conversation about iGaming.

MGM Resorts International is a global entertainment company with 31 national and international locations featuring best-in-class hotels, casinos, racinos, and state-of-the-art meetings and conference spaces, incredible live and theatrical entertainment experiences, and an extensive array of restaurant, nightlife, and retail offerings. Here in Ohio, we made a \$1 billion investment in 2018, when we acquired the Hard Rock Rocksinos. Now known as MGM Northfield Park, we are the statewide leader in gaming and racing.

Constructed in 1934, Northfield Park has a long racing pedigree in the state. Originally a racetrack known as Sportsman Park, with a focus on midget car racing, it eventually hit its stride in 1957 and would eventually become one of the nation's premier harness racing tracks in the country. Today, MGM Northfield Park is the leading gaming operator in the state with nearly 800 employees and paying over \$460 million in taxes since 2019, with a significant percentage of that going toward education. Locally, we have contributed nearly \$500,000 in charitable support since 2019.

There is an incredible opportunity for Ohio to modernize its gaming options, meaningfully generate revenue for the state without increasing taxes, and expand the existing commercial gaming market 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 and hope the information shared will assist the committee as you deliberate over policy measures that are crucial to the continued evolution of Ohio's gaming industry.

Collectively, Ohio's commercial brick-and-mortar gaming industry 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. According to the American Gaming Association casinos and racinos generated \$800 million in gaming tax revenue in 2024, while supporting nearly 10,000 direct jobs in Ohio.

As you consider the future of gaming in Ohio, we believe it is important to take a holistic approach on how best to modernize the industry. We have seen this with the recent passage of sports betting, which has created significant investment opportunities such as MGM's new sports book. Our new sports book has allowed us to grow our business, attract new customers, and bring more money to the state. As we



look to continue that trend, we believe 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 Ohio’s neighboring states of Pennsylvania, West Virginia, and Michigan, full-scale iGaming is expected to generate \$9.5 billion¹ in gross revenues by the end of 2025, representing a year-over-year growth of 11%.** The industry produces substantial tax receipts in each respective jurisdiction.

In order to ensure the success of iGaming and maximize the tax revenues generated by this new industry, it is crucial to promote a competitive market that provides sufficient market access points into the state. For example, the top three highest-grossing iGaming states each have a framework that allows a robust number of operators or skins – Pennsylvania has 21, Michigan has 18, while New Jersey has 29 skins.² We recommend that Ohio allow two skins for each land-based casino or racino property, which translates to a total of 22 skins. In our view, this number puts Ohio in line with the nation’s most successful iGaming markets, provides Ohioans with a meaningful choice of brands and gaming products, and will provide the state with the optimal level of tax revenues.

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.**

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 Ohio alone, the tax revenue generated by iGaming at 20 percent tax rate would be at least \$410 million annually at market maturity (i.e., five years from market launch).³

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 gaming.

These anecdotal observations of our experiences in New Jersey and Michigan are further substantiated

¹ Eilers & Krejcik Gaming, U.S. Online Casino Monitor, January 2025.

² Based upon the [April 2025 Monthly iGaming Revenue Report](#) of the NJ Division of Gaming Enforcement.

³ This figure is derived from the adult population in Ohio multiplied by the average iGaming GGR per adult from New Jersey, Michigan, and Pennsylvania taxed at 10% and 20%.



by several empirical studies that have examined the interplay between retail and online casinos. **A recent study by Eilers & Krejcik concluded that 1) online casinos have a positive impact on land-based revenue; 2) online casinos attract different customers versus land-based casinos and racinos; and 3) the typical state would boost revenue after introducing iGaming.**⁴

To repeat: We have over a billion dollars invested here in Ohio, 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 or table games, is a different form of entertainment, and our land-based venues will always offer an experience that cannot be replicated on a computer.

It is important to note that 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 and licensing fee is critical to stamping out unregulated online offshore operators and to recognize the already significant tax revenues⁵ that incumbent casino and racino 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 to 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 Ohio.

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

⁴ "Comparing Online and Land-Based Casino Gaming," Eilers & Krejcik, February 2024.



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 consistently 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 of 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. These are the same know-your-customer protocols we use for sports betting accounts created in the state.
- We invest in responsible gambling. 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.

On this last point, 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, particularly on the aspect of responsible gambling. MGM Resorts understands and appreciates the concerns around legalized iGaming and potential impacts on individuals who may be at risk of developing a gambling-related problem. The company shares these concerns, which is why we, along with our online gaming partner, BetMGM, have built a responsible gambling program that goes beyond regulatory compliance standards and puts our patrons first through the responsible gambling resources and tools we provide. We believe that responsible gambling is critical to ensuring business sustainability and success. I am very proud to share below just some of the efforts we have made over the years to embed responsible gambling within our culture.

1. Empowering Patrons with Tools and Resources

We firmly believe in empowering our patrons to make informed and healthy decisions about their gambling. In partnership with the British Columbia Lottery Corporation, BetMGM offers the award-winning and best-in-class responsible gambling program, GameSense, across all BetMGM markets. GameSense is a patron service-oriented responsible gambling program developed to help patrons



understand how to keep gambling fun and provide support for patrons who need it. The program provides patrons of all levels with information on how different forms of gambling work, common odds of the games, how to use BetMGM's responsible gambling tools, and what patrons can do to ensure they are gambling responsibly.

This educational responsible gambling resource also provides information regarding problem gambling warning signs, how and where to get assistance, and information for family members of loved ones who may be experiencing problem gambling. BetMGM promotes GameSense throughout its platform, including within the BetMGM homepage's primary promotional carousel, and can be viewed by the public.

In addition to GameSense information, BetMGM offers a suite of responsible gambling tools, including:

- **Deposit, spending, and wager and loss limits:** Users can set daily, weekly, or monthly caps.
- **Time reminders:** Notifications encourage patrons to take breaks after extended play periods.
- **Self-exclusion options:** Patrons can choose to temporarily or permanently exclude themselves from our platform. BetMGM also provides information regarding state self-exclusion programs, which is another method to help individuals cease gambling on licensed and regulated platforms.

These tools are not just offered passively. We actively promote their availability and encourage all users, whether they exhibit risk behaviors or not, to take advantage of them as part of a balanced gambling experience.

At BetMGM, transparency is a cornerstone of our operations. We provide users with detailed account histories, so they can review their wagering activity and stay in control.

2. Access to Resources

BetMGM is a strong supporter of problem gambling helplines and referral services, ensuring that users who may need external support have direct access to it. The problem gambling helpline is included within BetMGM's platform and its marketing and advertising.

In addition to providing those experiencing problem gambling with helpline and other problem gambling resource information, BetMGM is proud to partner with Kindbridge Behavioral Health, a telehealth company that provides treatment and services for those suffering from gambling problems. Kindbridge is staffed with licensed and certified mental health providers who specialize in treatment for gambling addiction. Through this program, BetMGM is providing BetMGM patrons who self-exclude, or whose accounts are closed for problem gambling reasons, a direct link to mental health intake and treatment for gambling addiction. The mental health intake and group services are provided at no cost to the patron via telehealth, which removes a significant barrier that has historically prevented people from receiving critical problem gambling care and treatment.

3. Continuous Education and Awareness



Education is critical to informed decision making and gambling harm prevention. BetMGM actively invests in campaigns designed to:

- Promote the principles of responsible gambling.
- Educate patrons about how gambling works, including the role of chance and the risks of chasing losses.
- Highlight the importance of maintaining a budget and understanding the odds.
- Encourage the use of BetMGM's responsible gambling tools to help patrons bet within their limits.

Last year, BetMGM debuted its first responsible gambling commercial starring NHL player Connor McDavid to promote awareness of our platform's responsible gambling tools. This commercial is currently airing on television throughout the U.S., as well as through BetMGM and Connor McDavid's social media channels.

Further, last fall, BetMGM promoted GameSense in nine NFL stadiums throughout the regular season, and BetMGM also prominently promotes GameSense in its marketing and advertisements – ranging from billboards to television to print and radio ads.

In addition to responsible gambling specific messaging, BetMGM adheres to the American Gaming Association's Responsible Marketing Code for Sports Wagering. This code sets industry standards for marketing only to those of legal age to wager, providing responsible gambling disclaimers in all marketing, and ensuring marketing is not misleading.

4. Collaborating with Experts and Advocates

BetMGM partners with leading organizations specializing in problem gambling research and support, such as the newly formed Responsible Online Gaming Association ("ROGA"), International Center for Responsible Gaming, National Council on Problem Gambling (NCPG), EPIC Global Solutions, and Kindbridge Behavioral Health. Through these collaborations, we:

- Train our patron support teams to recognize signs of distress and respond appropriately.
- Provide funding for research and community outreach programs.
- Ensure our policies are informed by the latest insights and best practices.
- Develop cross operator self-exclusion.
- Provide education and support to key community groups.

5. Transparency and Accountability

BetMGM's Responsible Gambling Council, which is chaired by its Chief Executive Officer and consists of the heads of each department, is charged with ensuring responsible gambling is embedded into the company culture. The Council meets quarterly to provide strategic guidance and oversight in ensuring the company's responsible gambling goals are developed and achieved.



The policies and practices I have referenced all undergo regular third-party evaluations by the Ontario, Canada-based Responsible Gambling Council, a third-party responsible gambling research and expert consultancy (not to be confused with BetMGM's internal council).

We look forward to working with Chair Stewart and the Committee on developing a framework that legalizes iGaming in a responsible way that creates opportunities for all Ohioans 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