

# Maryland Lottery and Gaming Control Agency

Wes Moore, Governor • John Martin, Director



Montgomery Park Business Center  
1800 Washington Blvd., Ste. 330  
Baltimore, Maryland 21230

Tel: 410-230-8800  
TTY users call Maryland Relay  
www.mdlottery.com

March 12, 2025

VGW US, Inc.  
442 Post Street, Suite 900  
San Francisco, CA 94102

VGW Games Limited  
Trident Park, Notabile Gardens  
No. 6, Level 3  
Central Business District  
Mdina Road, Zone 2  
Birkirkara, CBD2010, Malta

[support@luckylandslots.com](mailto:support@luckylandslots.com); [dataprivacy@vgw.co](mailto:dataprivacy@vgw.co); and [support@chumbacasino.com](mailto:support@chumbacasino.com)

## **RE: VGW d/b/a Chumba Casino and Luckyland Slots Business in Maryland**

Dear Legal Counsel:

It has come to the Maryland Lottery and Gaming Control Agency's ("MLGCA") attention that VGA d/b/a Chumba Casino and Luckyland Slots ("VGW"), is offering and conducting online gaming activities in Maryland without legal authority to do so. Maryland has enumerated laws that identify the types of gaming that may be offered in the State. If the game or activity does not fit within one of those enumerated provisions, then that game or activity is not permitted in the State.

The laws and regulations governing the operation of sports wagering in Maryland are found at State Government Article ("SG") § 9-1E-01, Annotated Code of Maryland, and Code of Maryland Regulations ("COMAR") 36.10 and 36.11. The laws and regulations governing the operation of casino gaming in Maryland are found in SG §§ 9-1A *et seq.* and COMAR 36.03. The laws and regulations governing the operation of fantasy competitions in Maryland are found at SG §§ 9-1D-01 *et seq.*, and COMAR 36.09.

The only online gaming permitted in Maryland is mobile/online sports wagering and online fantasy competitions. In Maryland, sports wagering is prohibited unless the operator has first been issued a sports wagering license by the Maryland Lottery and Gaming Control Commission ("Commission"). Fantasy competition operators must be registered with the Commission. Online casino gaming (also known as iGaming) is not permitted in Maryland, and an operator is prohibited from offering any casino gaming unless licensed by the Commission. The Commission has no record of VGW being issued a sports wagering license, a casino gaming license, or registration as a fantasy competition operator.

Please send me a responsive email no later than 5:00 pm ET on March 27, 2025. If VGW is not offering sports wagering, casino gaming or fantasy competitions in Maryland, please include in your responsive email a statement confirming that VGW is not offering or conducting any of these gaming activities in Maryland.

If VGW is offering any of these gaming activities in Maryland, please include in your responsive email:

- 1) A detailed description of the name of each casino game offering, along with its mobile link, or its retail location and trade name, as applicable;

VGW

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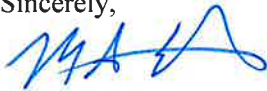
- 2) A detailed description of each sports wagering offering, along with its mobile link, or its retail location and trade name, as applicable;
- 3) A detailed description of each fantasy competition offering, along with its mobile link, or its retail location and trade name, as applicable; and
- 4) Any legal analysis or opinion interpreting Maryland Law that concludes, advises, or suggests that VGW may legally offer sports wagering, casino games or fantasy competition games in Maryland without Commission registration or licensure.

If VGW is offering in Maryland any sports wagering or casino gaming activity for which it has not been licensed, or is operating fantasy competition games without being registered, please acknowledge in your response that VGW will cease offering any sports wagering, casino game, or fantasy competition in Maryland, and a date within 10 days from the date of this letter in which you intend to cease such operations.

Your failure to provide the required information may jeopardize the ability of VGW to ever be issued: a license for sports wagering or gaming, registration as a fantasy competition operator, any other license, registration, or certification from the Commission in the future.

I look forward to your prompt response to me at [michael.eaton@maryland.gov](mailto:michael.eaton@maryland.gov). If you have any questions, you may reach me by phone at 410-230-8821.

Sincerely,



Michael Eaton  
Managing Director, Gaming