

**Bally's Interactive:
Sub-Binder 1 (Part 5)**

**Bally's Interactive: Sub-Binder 1 (Part 5), Operator Information
Table of Contents**

Section Number	Description
5.2	Number of Operators to be Hosted
5.3	Operator Organization
Exhibit 4.3	Contact Person
Exhibit 4.4	Location of the Applicant's Principal Place of Business
Exhibit 4.5	Type of Business Formation
Exhibit 4.5a	Bally's Interactive, LLC Certificate of Formation
Exhibit 4.5b	Bally's Interactive, LLC EIN
Exhibit 4.6	Table of Ownership
Exhibit 4.6a	Bally's Corporate Chart
Exhibit 4.6b	Top 50 Identified Owners
Exhibit 4.7	Organizational Chart
Exhibit 4.7a	Bet.Works Team Organizational Chart
Exhibit 4.7b	Bally's Corp. Organizational Chart
Exhibit 4.8	Names, Addresses and Experience of all Directors and Officers
Exhibit 4.8a	Bally's Interactive, LLC - List of Officers and Managers
Exhibit 4.9	Lobbyist Registration and Identification
Exhibit 4.10	Names, Addresses and Ownership of Other Interests
Exhibit 4.10a	Bally's Interactive, LLC - Name and Address of Ownership Interests
Exhibit 4.11	Conflicts of Interest
Exhibit 4.12	Public Officials
Exhibit 4.13	Contracts with the State of New York
Exhibit 4.14	Organizational Documents
Exhibit 4.14b1	Bally's Interactive, LLC - First Amendment to Operating Agreement - 5/24/21
Exhibit 4.14b2	Bally's Interactive, LLC - Second Amendment to Operating Agreement - 5/28/21
Exhibit 4.14c	Bally's Interactive, LLC - DE Certificate of Formation - 12/2/20

**Bally's Interactive: Sub-Binder 1 (Part 5), Operator Information
Table of Contents**

Exhibit 4.14d	Bally's Interactive, LLC - Operating Agreement - 12/2/20
5.4	Applicant as an Operator
5.5	Licensure
5.6	Advertising and Promotional Plans
Exhibit 5.6a	Marketing and Advertising

5.2

5.2 NUMBER OF OPERATORS TO BE HOSTED

The Applicant shall identify the number of Operators the Applicant proposes to host on the Applicant's Platform.

One.

5.3

5.3 OPERATOR ORGANIZATION

For each Operator the Applicant proposes to host as part of this Application, the Applicant shall provide the full name of the Operator as it appears on such Operator's certificate of incorporation, charter or other official formation document, along with any D/B/A or trade names. The Application shall include for each proposed Operator, information on the Operator consistent with that required for the Applicant pursuant to Sections 4.3 through 4.14 of Part 4 of this RFA.

Bally's Interactive, LLC, d/b/a "Bally Bet". The previously provided information for Applicant sections 4.3-4.14 is identical to the information for the Operator.

Exhibit 4.3

4.3 CONTACT PERSON

The name, title, email address and telephone number of the individual to be contacted for the Applicant in reference to the Application.

Adi Dhandhania

Senior Vice President, Strategy and Interactive, Bally's Corporation

[REDACTED]

[REDACTED]

Exhibit 4.4

4.4 LOCATION OF THE APPLICANT'S PRINCIPAL PLACE OF BUSINESS

The street address, city, state, zip code and telephone number for the Applicant's principal place of business, as well as the URL for any website maintained by or for the Applicant.

100 Westminster Street, Suite 1002, Providence, RI 02903

<https://Ballys.com>

Exhibit 4.5

4.5 TYPE OF BUSINESS FORMATION

The type of business entity under which the Applicant is formed (*e.g.*, corporation, limited liability company, partnership), the state (or other jurisdiction) of formation and the Federal Tax Identification Number (also known as the Federal Employer Identification Number). Attach evidence of the entity's current ability to conduct business (*e.g.*, certificate of good standing, certificate of status) from the state (or other jurisdiction) of formation as of a date not earlier than 10 days prior to the submission of the Application.

Bally's Interactive is a Limited Liability Company

State of formation: Delaware

See Exhibit 4.5a for Certificate of Good Standing

IRS SS-4 Federal ID Number: [REDACTED]

See Exhibit 4.5b

Exhibit 4.5a

Delaware

Page 1

The First State

I, JEFFREY W. BULLOCK, SECRETARY OF STATE OF THE STATE OF DELAWARE, DO HEREBY CERTIFY THAT "BALLY'S INTERACTIVE, LLC" IS DULY FORMED UNDER THE LAWS OF THE STATE OF DELAWARE AND IS IN GOOD STANDING AND HAS A LEGAL EXISTENCE NOT HAVING BEEN CANCELLED OR REVOKED SO FAR AS THE RECORDS OF THIS OFFICE SHOW AND IS DULY AUTHORIZED TO TRANSACT BUSINESS.

THE FOLLOWING DOCUMENTS HAVE BEEN FILED:

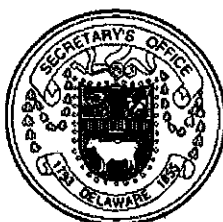
CERTIFICATE OF FORMATION, FILED THE SECOND DAY OF DECEMBER, A.D. 2020, AT 1:09 O`CLOCK P.M.

CERTIFICATE OF MERGER, FILED THE TWENTY-EIGHTH DAY OF MAY, A.D. 2021, AT 3:42 O`CLOCK P.M.

AND I DO HEREBY FURTHER CERTIFY THAT THE EFFECTIVE DATE OF THE AFORESAID CERTIFICATE OF MERGER IS THE TWENTY-EIGHTH DAY OF MAY, A.D. 2021 AT 5:02 O`CLOCK P.M.

AND I DO HEREBY FURTHER CERTIFY THAT THE AFORESAID CERTIFICATES ARE THE ONLY CERTIFICATES ON RECORD OF THE AFORESAID LIMITED LIABILITY COMPANY, "BALLY'S INTERACTIVE, LLC".

AND I DO HEREBY FURTHER CERTIFY THAT THE ANNUAL TAXES HAVE BEEN PAID TO DATE.



4307444 8310

SR# 20212824633

You may verify this certificate online at corp.delaware.gov/authver.shtml

A handwritten signature in black ink, appearing to read "JBULLOCK", is written over a horizontal line. Below the line, the text "Jeffrey W. Bullock, Secretary of State" is printed.

Authentication: 203817233

Date: 08-02-21

Exhibit 4.5b

Date of this notice: 03-03-2021

Employer Identification Number:
[REDACTED]

Form: SS-4

Number of this notice: CP 575 A

BALLYS INTERACTIVE LLC
CRAIG EATON SOLE MBR
100 WESTMINSTER ST
PROVIDENCE, RI 02903

For assistance you may call us at:
1-800-829-4933

IF YOU WRITE, ATTACH THE
STUB AT THE END OF THIS NOTICE.

WE ASSIGNED YOU AN EMPLOYER IDENTIFICATION NUMBER

Thank you for applying for an Employer Identification Number (EIN). We assigned you EIN [REDACTED]. This EIN will identify you, your business accounts, tax returns, and documents, even if you have no employees. Please keep this notice in your permanent records.

When filing tax documents, payments, and related correspondence, it is very important that you use your EIN and complete name and address exactly as shown above. Any variation may cause a delay in processing, result in incorrect information in your account, or even cause you to be assigned more than one EIN. If the information is not correct as shown above, please make the correction using the attached tear off stub and return it to us.

Based on the information received from you or your representative, you must file the following form(s) by the date(s) shown.

Form 941	07/31/2021
Form 940	01/31/2022

Your Form 11C and/or 730 becomes due the month after your wagering starts.

If you have questions about the form(s) or the due date(s) shown, you can call us at the phone number or write to us at the address shown at the top of this notice. If you need help in determining your annual accounting period (tax year), see Publication 538, *Accounting Periods and Methods*.

We assigned you a tax classification based on information obtained from you or your representative. It is not a legal determination of your tax classification, and is not binding on the IRS. If you want a legal determination of your tax classification, you may request a private letter ruling from the IRS under the guidelines in Revenue Procedure 2004-1, 2004-1 I.R.B. 1 (or superseding Revenue Procedure for the year at issue). Note: Certain tax classification elections can be requested by filing Form 8832, *Entity Classification Election*. See Form 8832 and its instructions for additional information.

If you are required to deposit for employment taxes (Forms 941, 943, 940, 944, 945, CT-1, or 1042), excise taxes (Form 720), or income taxes (Form 1120), you will receive a Welcome Package shortly, which includes instructions for making your deposits electronically through the Electronic Federal Tax Payment System (EFTPS). A Personal Identification Number (PIN) for EFTPS will also be sent to you under separate cover. Please activate the PIN once you receive it, even if you have requested the services of a tax professional or representative. For more information about EFTPS, refer to Publication 966, *Electronic Choices to Pay All Your Federal Taxes*. If you need to make a deposit immediately, you will need to make arrangements with your Financial Institution to complete a wire transfer.

Exhibit 4.6

4.6 TABLE OF OWNERSHIP

A full and complete ownership chart for the Applicant and its affiliates including percentage ownership interests in the Applicant by its respective direct and indirect owners, illustrating the ultimate beneficial owners. For a publicly held company, disclosure of owners may be limited to owners owning five percent or more of the publicly held company.

Bally's Interactive, LLC an indirect subsidiary of Bally's Corporation.

We've included the shareholder listing for Bally's Corporation.

See Exhibits 4.6a and 4.6b

Exhibit 4.6a

Bally's Corporation

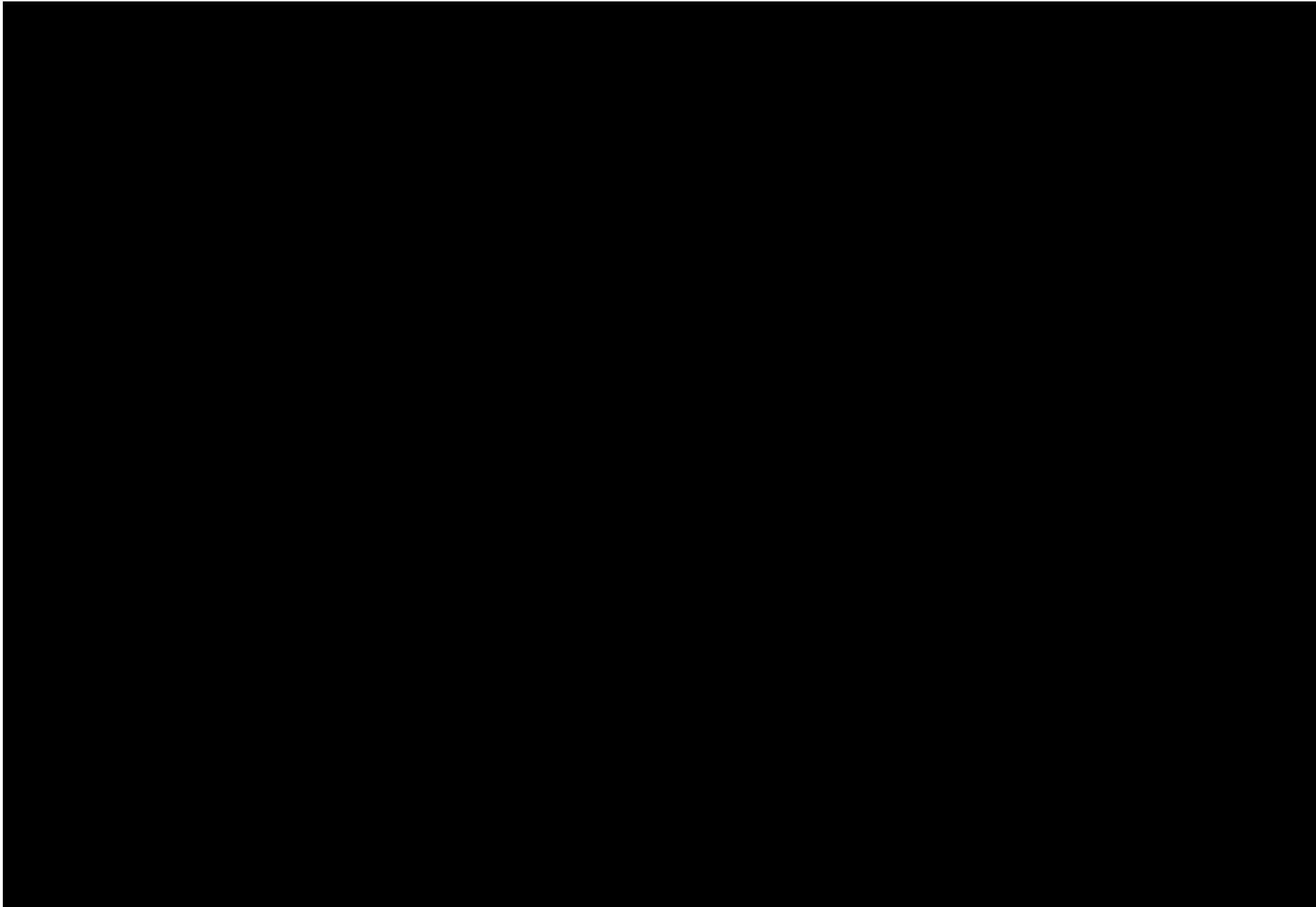


Exhibit 4.6b

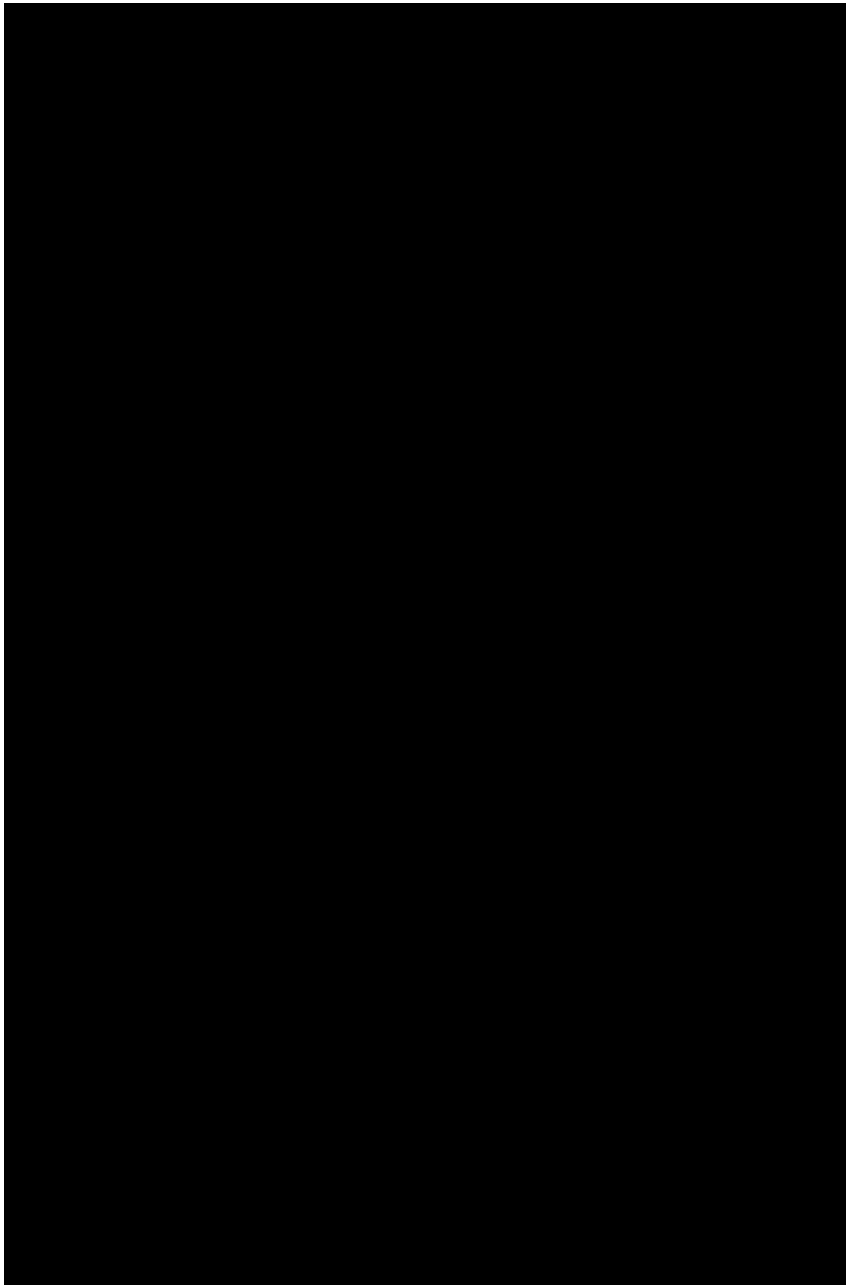
Exhibit 4.7

4.7 ORGANIZATIONAL CHART

An organizational chart of the Applicant including all key employees anticipated to be licensed as such pursuant to **Appendix A: Draft Regulation Part 5330** of the Commission's regulations, when adopted.

See Exhibits 4.7a (Organizational chart of the Bet.Works team, who are part of Bally's Interactive. Bet.Works built the platform and their technical team continues to update it, and they provide most of the operational services) and 4.7b (Organizational chart of Bally's Corp, which is the parent company of Bally's Interactive).

Exhibit 4.7a



Bally
INTERACTIVE

KEY

EXECUTIVE



7/14/2021

RISK & TRADING



/14/2021

FINANCE & HUMAN
RESOURCES



7/14/2021

MARKETING

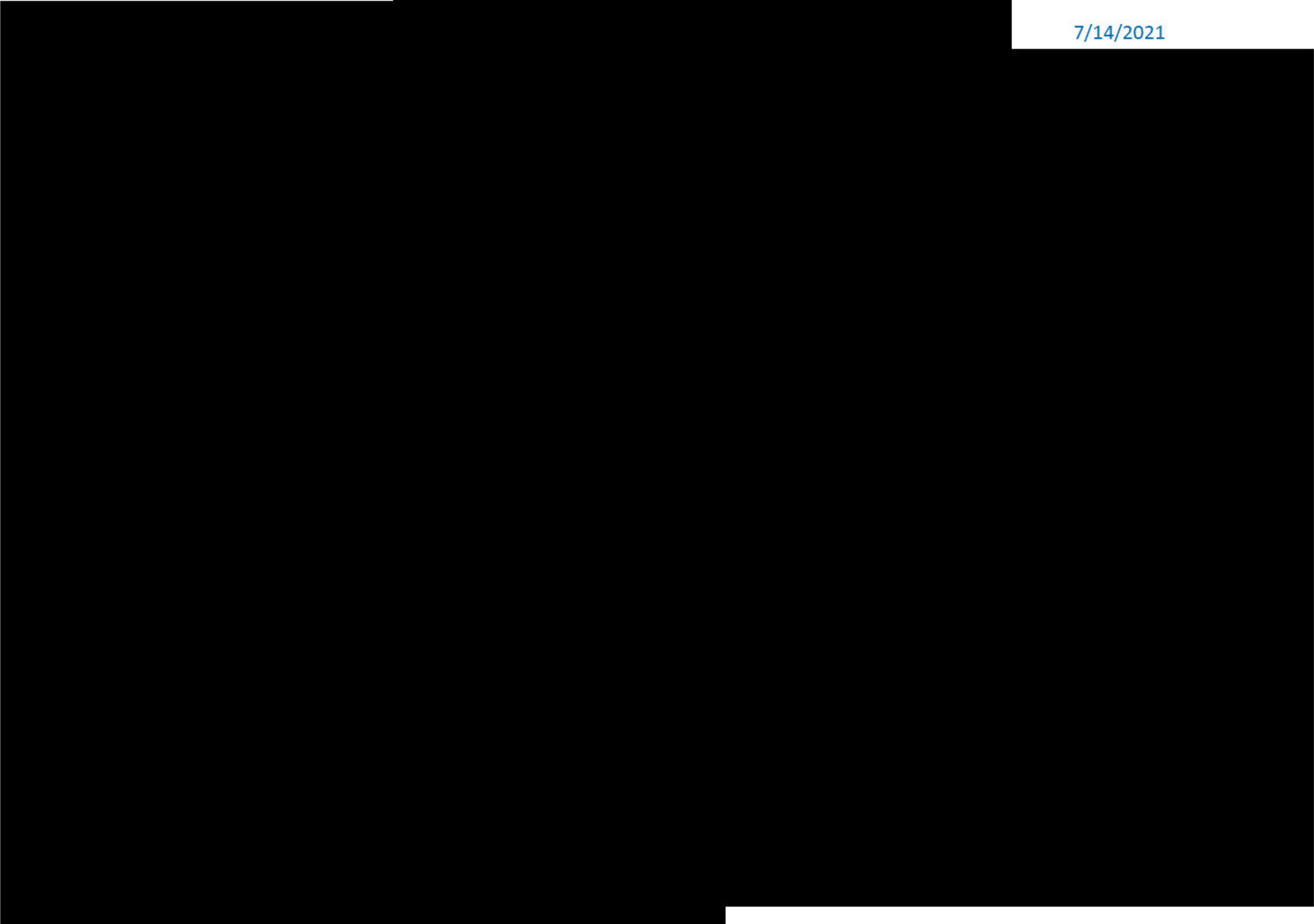


7/14/2021

OPERATIONS



7/14/2021



BUSINESS DEVELOPMENT



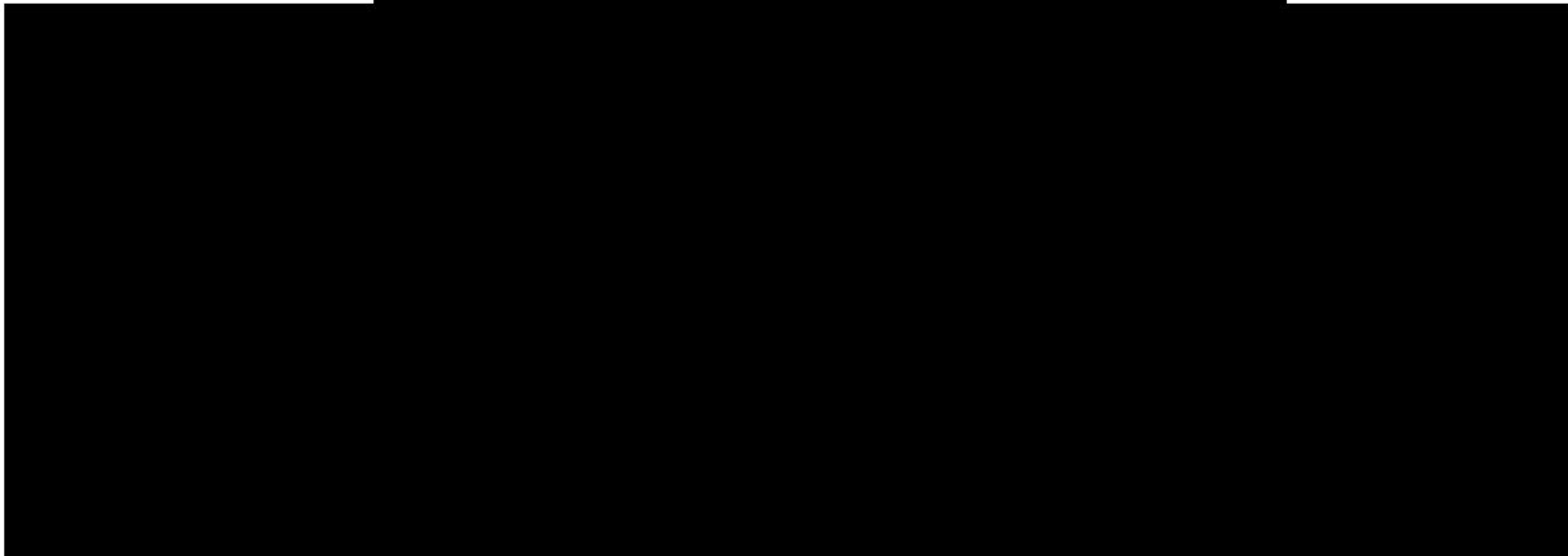
7/14/2021



TECHNOLOGY DEVELOPMENT

Bally
INTERACTIVE

7/14/2021

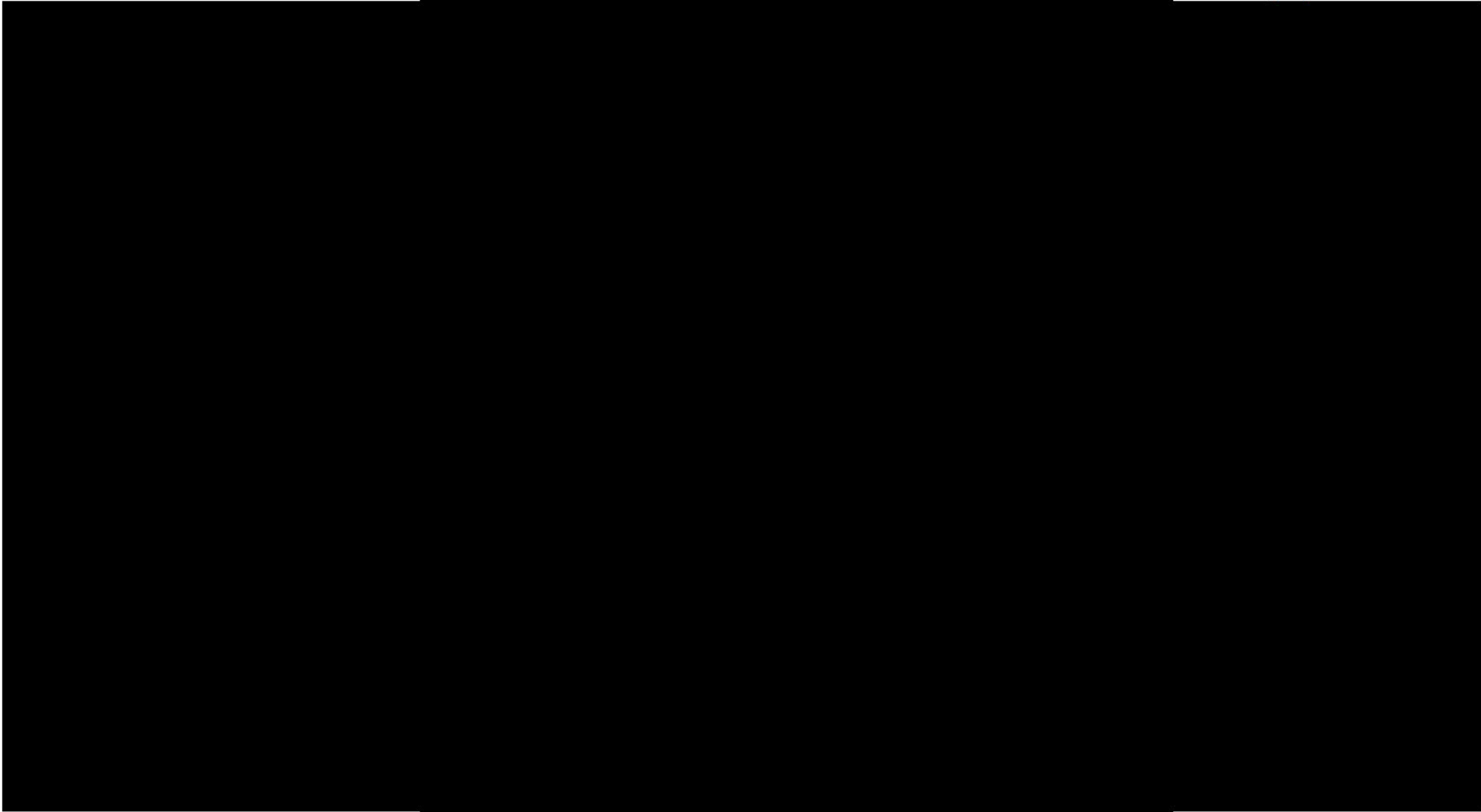


PRODUCT

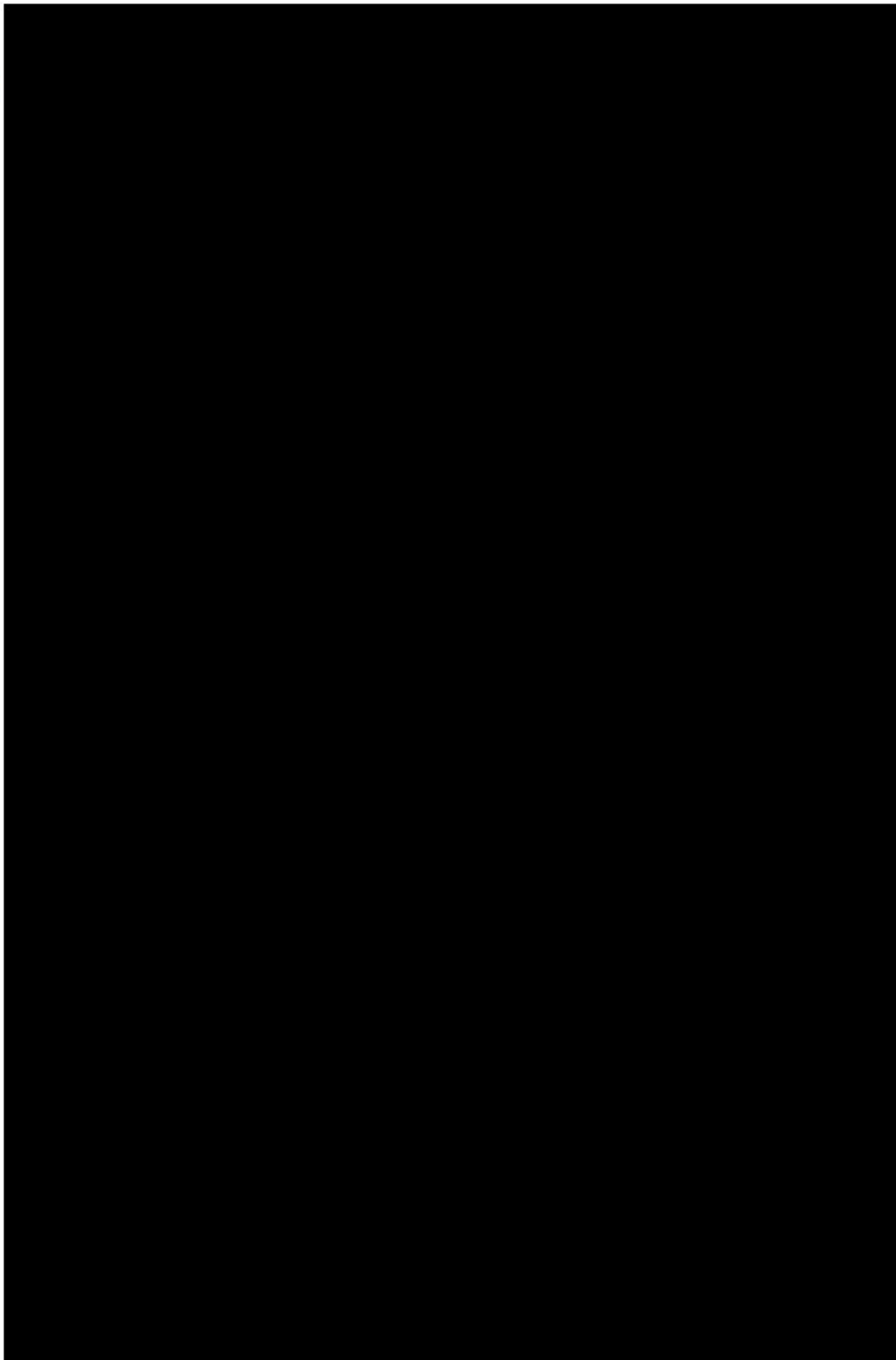


Bally
INTERACTIVE

7/14/2021



ARCHITECTURE



7/14/2021

SOFTWARE DEVELOPMENT



7/14/2021

Exhibit 4.7b

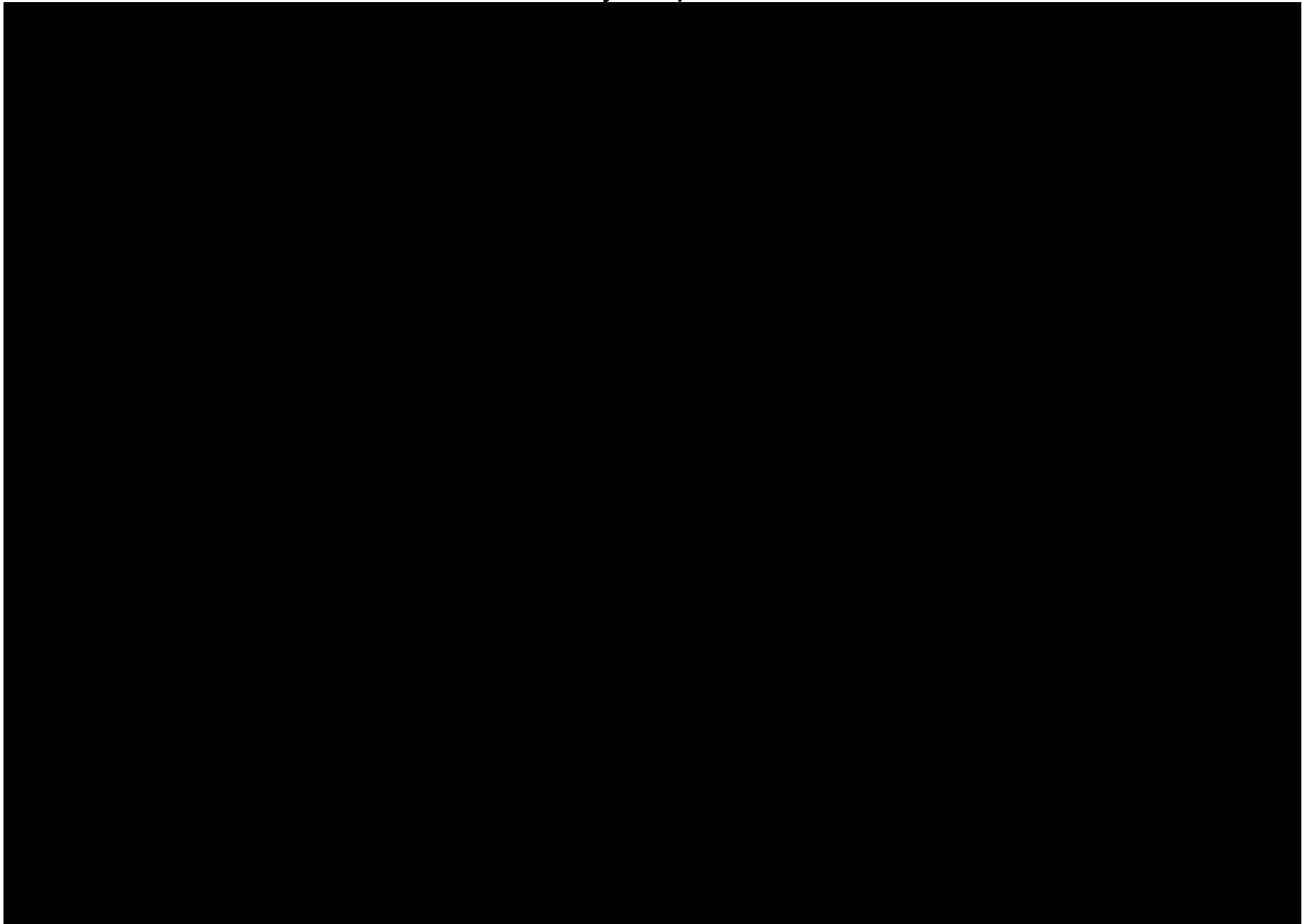


Exhibit 4.8

4.8 NAMES, ADDRESSES AND EXPERIENCE OF DIRECTORS AND OFFICERS

The name, address, and title of each Director or General Partner of the Applicant and each officer and proposed key employee of the Applicant, within the meaning of **Appendix A: Draft Regulation Part 5330** and resumes or C.V.s of all principals and known individuals who will perform executive management duties or oversight of the Applicant.

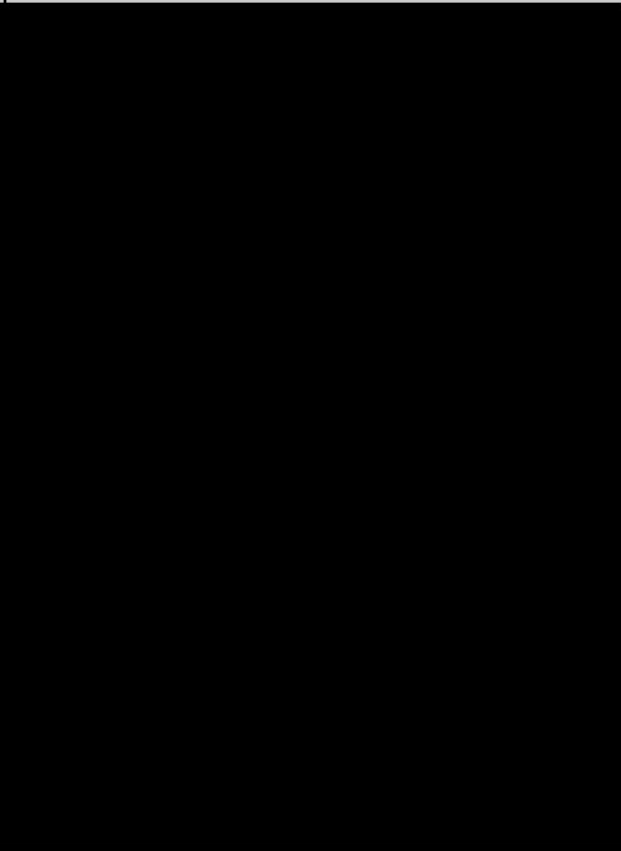
See Exhibit 4.8a

Exhibit 4.8a

Bally's Interactive, LLC

List of Officers and Managers

Officers

Name and Title	Address
George T. Papanier; President	
Stephen H. Capp; Executive Vice President, Chief Financial Officer & Treasurer	
Marc Crisafulli; Executive Vice President of Strategy and Operations	
Craig Eaton; Executive Vice President, General Counsel & Secretary	

Board of Managers

Name
George T. Papanier
Stephen H. Capp; Executive Vice President, Chief Financial Officer & Treasurer



GEORGE PAPANIER

PRESIDENT & CHIEF EXECUTIVE OFFICER

George Papanier's association with Bally's Corporation began in 2004 when he served as the Chief Operating Officer at Twin River, an appointment he held until February 2011 when he was then appointed to the role of President and CEO. His career in the gaming industry spans some 35 years.

Prior to joining Twin River, Mr. Papanier served in the same capacity for Peninsula Gaming with properties in Iowa and Louisiana, from 2000-2004 and as COO for Resorts Casino Hotel in Atlantic City, New Jersey from 1997 – 2000. Both positions involved strategic and tactical planning for the resorts and supervision of major renovation and construction projects. He was also active in evaluating potential acquisitions and development projects for the two organizations.

From 1995 – 1997 he served as CFO for both Sun International Hotels Limited in the Bahamas and Mohegan Sun Casino in Uncasville, CT. Earlier in his career he served in executive operations capacities for Hemmeter Enterprises in Denver, Colorado and in an executive financial capacity for Trump Plaza Hotel and Casino in Atlantic City. Mr. Papanier is a graduate of Rowan University where he received a B.A. in Business Administration and Accounting. He is a Certified Public Accountant and served as Treasurer of the Casino Association of New Jersey in 1999 – 2000. George Papanier is a member of the Board of Directors of Bally's Corporation.



STEVE CAPP

EXECUTIVE VICE PRESIDENT & CHIEF FINANCIAL OFFICER

Mr. Capp joined Bally's Corporation as Executive Vice President and Chief Financial Officer in January 2019. He previously served as a member of the Bally's board of directors from 2012 through 2018, and was a member of the audit and compensation committees during that time. From 2003 to 2011, Mr. Capp served as Executive Vice President and Chief Financial Officer of Pinnacle Entertainment, a then-public casino gaming and hospitality company based in Las Vegas.

Prior to working at Pinnacle Entertainment, Mr. Capp was a Managing Director at Bear Stearns in New York from 1997 to 2003, specializing in leveraged finance, and prior to that was a Managing Director at BancAmerica Securities in Los Angeles and San Francisco. Mr. Capp brings 30 years of financial, banking and operating experience to the Bally's management team.



MARC CRISAFULLI

**EXECUTIVE VICE PRESIDENT, STRATEGY AND OPERATIONS, &
PRESIDENT, RHODE ISLAND OPERATIONS**

Marc Crisafulli serves as Executive Vice President, Strategy & Operations, and President of Twin River Casino Hotel and Tiverton Casino Hotel, two of the company's Rhode Island properties.

Mr. Crisafulli is responsible for the company's pursuit of strategic initiatives and directs the company's government and public affairs for all of the Bally's properties nationwide. Mr. Crisafulli was also appointed by the Board of Directors as the executive sponsor for the company's environmental, social and governance (ESG) initiatives. Mr. Crisafulli most recently served as the President of the US&C and Global Device Protection for Brightstar Corporation, a Softbank Company, where he was responsible for a \$5 billion region, based outside of Chicago, with operations in the United States and Canada as well as a \$300 million global division with operations on five continents. Prior to that he was an active member of the Rhode Island business community having served as managing partner of Hinckley, Allen & Snyder as well as a senior executive and general counsel for GTECH Corporation, now IGT.



CRAIG EATON

EXECUTIVE VICE PRESIDENT, GENERAL COUNSEL & SECRETARY

Craig Eaton is the Executive Vice President, General Counsel, Secretary and Compliance Officer for Bally's Corporation. He has been associated with the Company since 2005 and has over 25 years of legal, regulatory and business experience.

Mr. Eaton was a partner at the law firm of Adler, Pollock and Sheehan, chairing its regulatory and compliance practice group from 1998 through 2004. From 1995 to 1998, Mr. Eaton was General Counsel to the Narragansett Electric Company. A 1987 cum laude graduate of Union College and 1990 graduate of Boston College Law School, he is an active participant on various charitable and civic boards, and is a volunteer coach for various youth sports organizations.

Exhibit 4.9

4.9 LOBBYIST REGISTRATION REQUIREMENT

PML Section 1329 requires each lobbyist seeking to engage in lobbying activity on behalf of a client or a client's interest before the Commission to first register with the secretary of the Commission. While this obligation falls to the lobbyist, Applicant identification of its lobbyists is requested.

The following table lists Bally's Corp.'s lobbyists for New York.

Organization	Contacts	Jurisdiction
Albany Strategic Advisors	Allison Lee	NY
Ward Strategies	Peter Ward	NY

Exhibit 4.10

4.10 NAMES, ADDRESSES AND OWNERSHIP AND OTHER INTERESTS

The name and business address of each person or entity who or that has a direct or indirect ownership or other proprietary interest (financial, voting or otherwise) in five percent or more in the Applicant.

See Exhibit 4.10a

Exhibit 4.10a

Bally's Interactive, LLC

Name and Address of Ownership Interests

Entity	Address
---------------	----------------

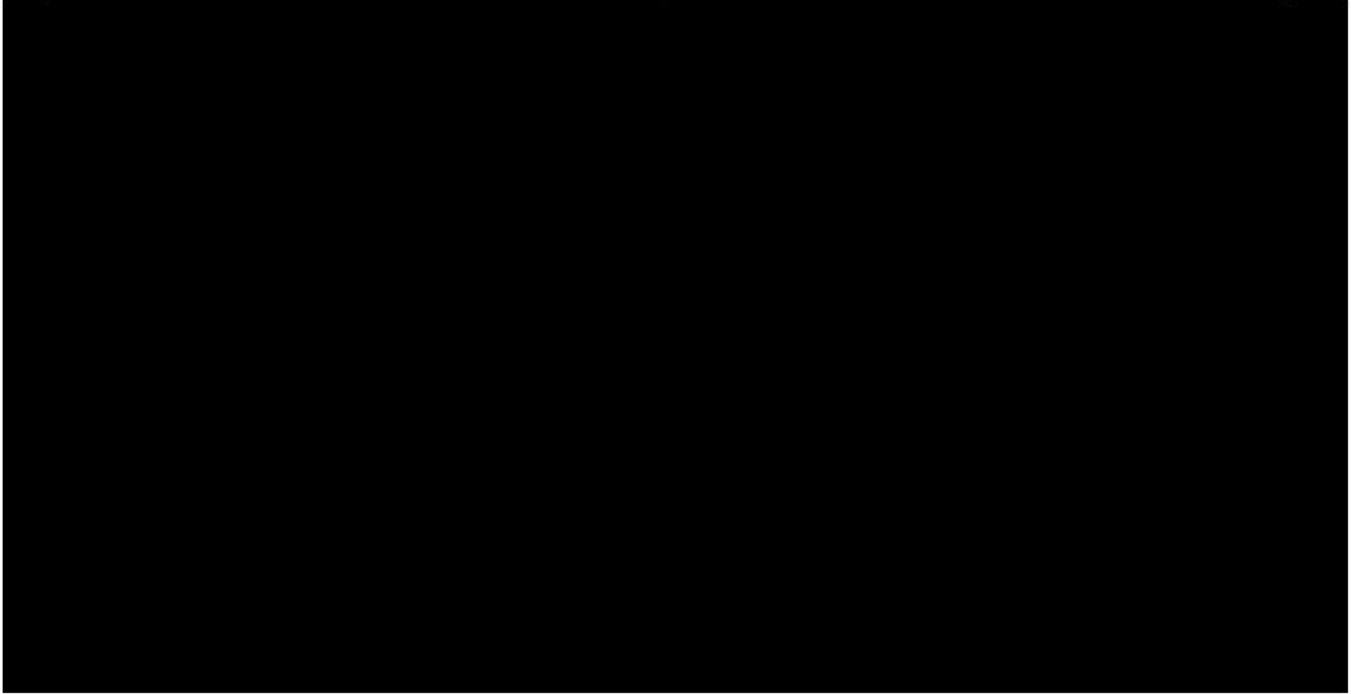


Exhibit 4.11

4.11 CONFLICTS OF INTEREST

A description of any relationship or affiliation of the Applicant or any of the Applicant's affiliates that currently exists or existed in the past five years with any member, employee, consultant or agent of the Commission that is a conflict of interest or may be perceived as a conflict of interest during the RFA process. Further, if any such conflict should arise during the term of the RFA process, the Applicant shall notify immediately the Commission, in writing, of such conflict.

The Commission shall make the final determination as to whether any activity constitutes a conflict of interest pursuant to this provision. The Commission's decision shall be final; however, the Commission will not make any such decision without providing the Applicant with an opportunity to present comments.

If an Applicant does not identify any direct or indirect conflict of interest, or perceived conflict of interest, at the time the Applicant submits the Applicant's Application, the Applicant shall state that no conflict or perceived conflict of interest exists with respect to such Application. If the Applicant identifies a conflict of interest or perceived conflict of interest, the Applicant shall disclose the conflict and the steps the Applicant will take to resolve such conflict.

Bally's Interactive has no conflict of interest with the Commission, real or perceived.

Exhibit 4.12

4.12 Public Officials

Submit a list of names, titles, addresses and telephone numbers of any public officials or officers or employees of any governmental entity, and immediate family members of any such public officials, officers or employees, to the extent known, who, directly or indirectly, own any financial interest in, have any beneficial interest in, are the creditors of, hold any debt instrument issued by, or hold or have an interest, direct or indirect, in any contractual or service relationship with the Applicant or their Affiliates. Also submit a statement listing all persons and entities not listed in the immediately preceding sentence who or that have any arrangement, written or oral, to receive any compensation from anyone in connection with the Application, the RFA process or the process of obtaining of a License from the State, describing the nature of the arrangement, the service to be provided and the amount of such compensation, whether actual or contingent.

Bally's Interactive is unaware of any public or governmental officials, officers, or employees that have a financial or beneficial interest in our company.

The following corporate entities have been or will be compensated by Bally Corporation for professional services rendered in the preparation of the Application:

Orrick, Herrington & Sutcliffe LLP

Orrick has a contractual arrangement to provide legal services and receive compensation from Bally Corporation in connection with the Application. Please see below for a list of Orrick attorneys and staff involved in the Application and their hourly billing rates.

- Jeremy Kudon, Partner, [REDACTED]
- Scott Ward, Partner, [REDACTED]
- Nick Green, Partner, [REDACTED]
- Ben Aiken, Senior Associate, [REDACTED]
- Brad Fischer, Managing Associate, [REDACTED]
- Julie Pearlman, Managing Associate, [REDACTED]
- Pat Gibbs, Associate, [REDACTED]
- Ayala Magder, Law Clerk, [REDACTED]
- Elizabeth Walker, Senior Paralegal, [REDACTED]

- Mystic Rosa, Senior Paralegal, [REDACTED]
- Indira Kinsella, Senior Paralegal, [REDACTED]
- Sam Adler, Practice Assistant, [REDACTED]

Frontier Economics Limited

Frontier has a contractual arrangement to provide economic analysis services and receive compensation from Bally Corporation in connection with the Application. Please see below for a list of employees at Frontier involved in the Application and their hourly billing rates.

- Thomas Bibby, Intern, [REDACTED]
- Francesco Barcellona, Analyst, [REDACTED]
- Stephanie Calhoun, Analyst, [REDACTED]
- Elisabetta Vitello, Consultant, [REDACTED]
- Giacomo Cattoretti, Consultant, [REDACTED]
- Michael Naylor Smith, Consultant, [REDACTED]
- Kristine Dislere, Consultant, [REDACTED]
- Mike Owen, Manager, [REDACTED]
- Mark Johnson, Manager, [REDACTED]
- Simon Gaysford, Director, [REDACTED]

In addition, several outside vendors provided printing, copying, and shipping services in connection with the Application. Information for these companies can be provided at the Commission's request.

Exhibit 4.13

4.13 CONTRACTS WITH THE STATE OF NEW YORK

Submit a list of any current or previous contracts that the Applicant or its affiliates has had with, and any current or previous licenses that the Applicant has been issued by or under, any department or agency of the State. Include the contract or license name and number and a concise explanation of the nature of the contract or license.

Bally's Interactive is unaware of any current or previous contracts and licenses between our company and its affiliates with the State of New York.

Exhibit 4.14

4.14 ORGANIZATIONAL DOCUMENTS

Submit, as applicable, copies of the following documents that apply to the Applicant or the Applicant's owners:

- A. certified copy of each relevant certificate of incorporation, articles of incorporation or corporate charter;
- B. by-laws as amended through the date of the Application;
- C. certified copy of its certificate of formation or articles of organization of a limited liability company;
- D. limited liability company agreement or operating agreement as amended through the date of the Application;
- E. certified copy of each relevant certificate of partnership;
- F. partnership agreement as amended through the date of the Application;
- G. certified copy of each relevant certificate of limited partnership;
- H. limited partnership agreement as amended through the date of the Application;
- I. other legal instruments of organization;
- J. joint venture agreement;
- K. trust agreement or instrument, each as amended through the date of the Application;
- L. voting trust or similar agreement; and
- M. stockholder, member or similar agreement

See Exhibits 4.14b1, 4.14b2, 4.14c, 4.14d

Exhibit 4.14b1

[REDACTED]

[REDACTED]

[REDACTED]

IN WITNESS WHEREOF the parties have caused this Amendment to be executed effective as of the Effective Date.

SOLE MEMBER

BALLY'S CORPORATION

By:  _____

Name: Craig Eaton
Title: Executive Vice President,
General Counsel and Secretary



MEMBERS

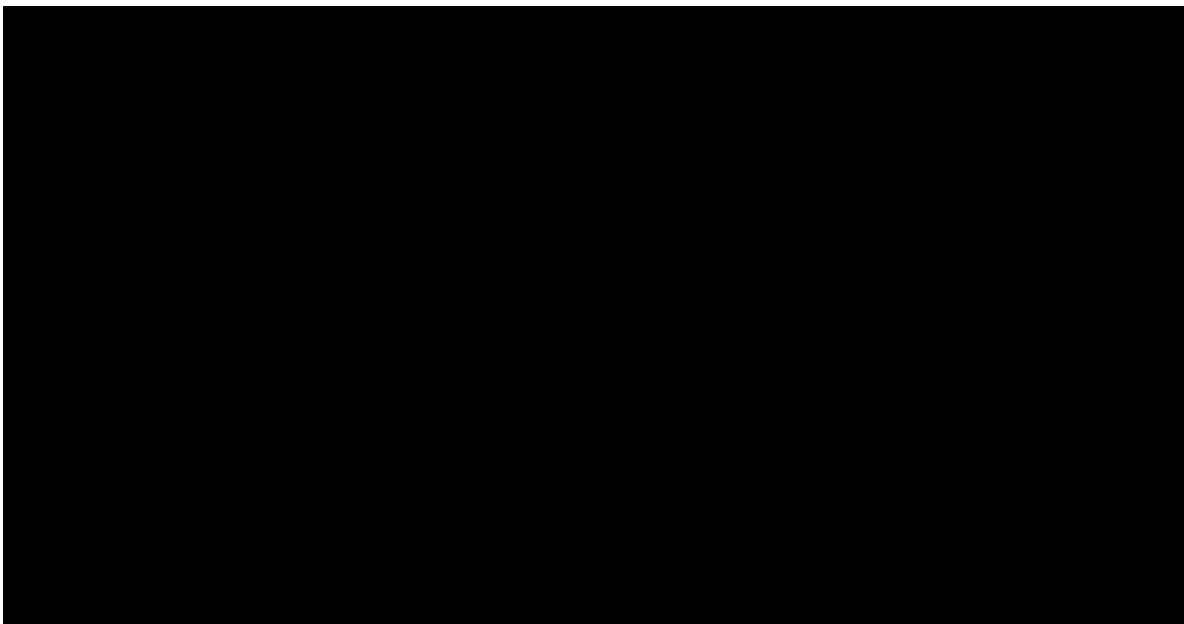
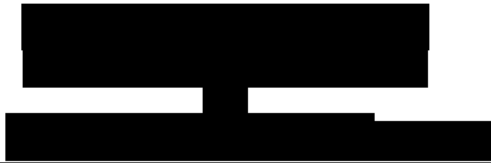


Exhibit 4.14b2



IN WITNESS WHEREOF the parties have caused this Amendment to be executed effective as of the Effective Date.

SOLE MEMBER

INTERSTATE RACING ASSOCIATION, INC.

By:  _____

Name: Craig Eaton
Title: Executive Vice President,
General Counsel and Secretary



MEMBERS

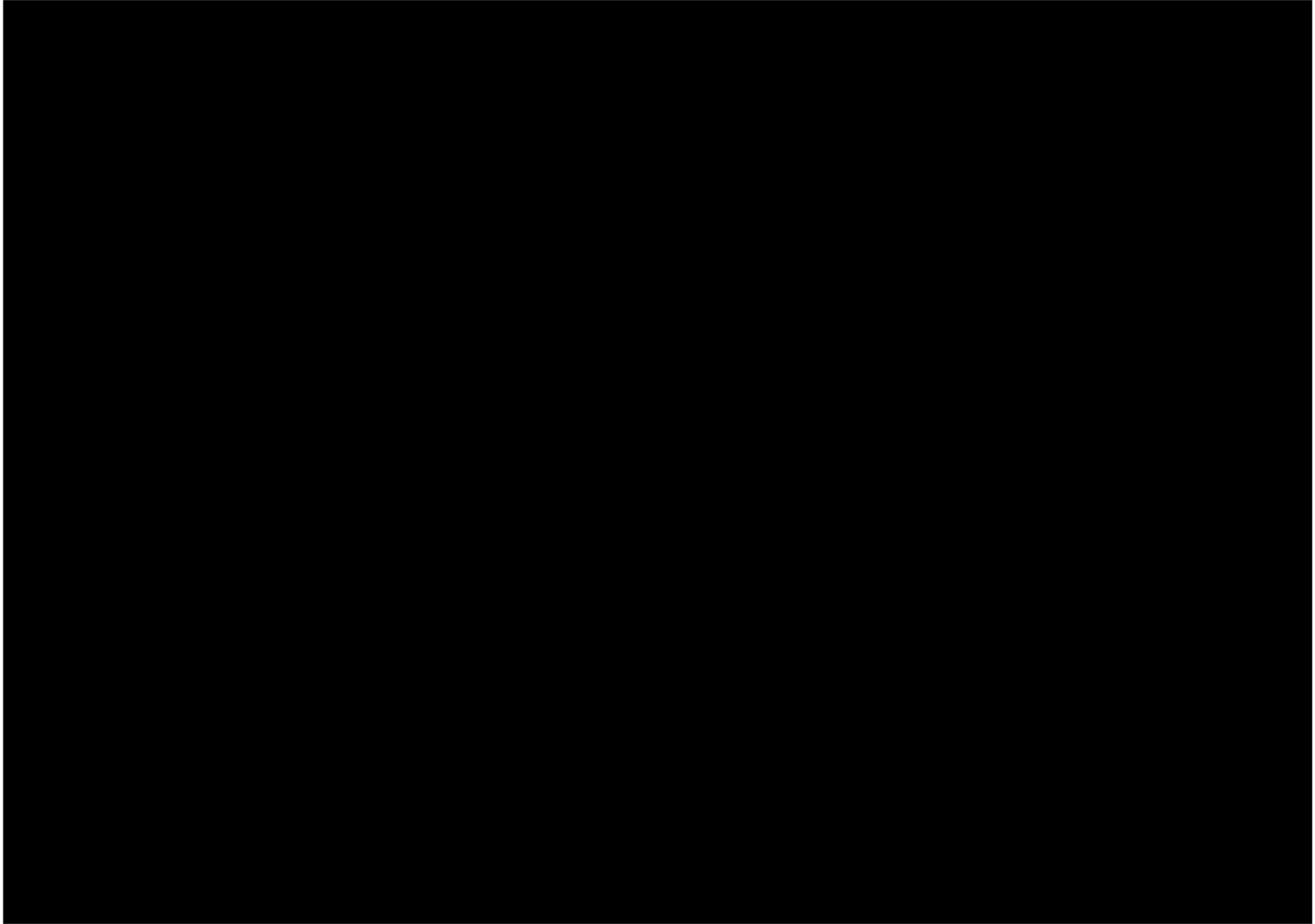


Exhibit 4.14c

Delaware

Page 1

The First State

I, JEFFREY W. BULLOCK, SECRETARY OF STATE OF THE STATE OF DELAWARE, DO HEREBY CERTIFY THE ATTACHED IS A TRUE AND CORRECT COPY OF THE CERTIFICATE OF FORMATION OF "BALLY'S INTERACTIVE, LLC", FILED IN THIS OFFICE ON THE SECOND DAY OF DECEMBER, A.D. 2020, AT 1:09 O`CLOCK P.M.




Jeffrey W. Bullock, Secretary of State

4307444 8100
SR# 20212550932

Authentication: 203536008
Date: 06-25-21

You may verify this certificate online at corp.delaware.gov/authver.shtml

CERTIFICATE OF FORMATION
OF
BALLY'S INTERACTIVE, LLC

The undersigned, being an authorized person under Section 18-201 of the Delaware Limited Liability Company Act (6 Del.C. §18-101, et seq.), hereby certifies:

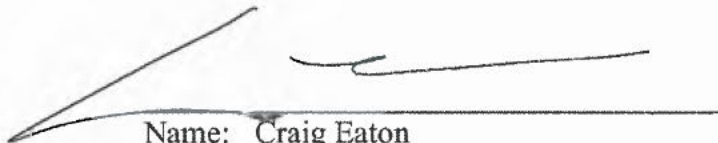
First. The name of the limited liability company formed hereby is: Bally's Interactive, LLC (the "LLC").

Second. The address of the registered office of the LLC in the State of Delaware is Corporation Trust Center, 1209 Orange Street, City of Wilmington, County of New Castle, Delaware 19801.

Third. The name of the registered agent for service of process on the LLC in the State of Delaware is The Corporation Trust Company.

[Remainder of Page Intentionally Left Blank]

IN WITNESS WHEREOF, the undersigned has executed this Certificate of Formation this 2nd day of December, 2020, to be effective on the date of its filing with the Delaware Secretary of State.

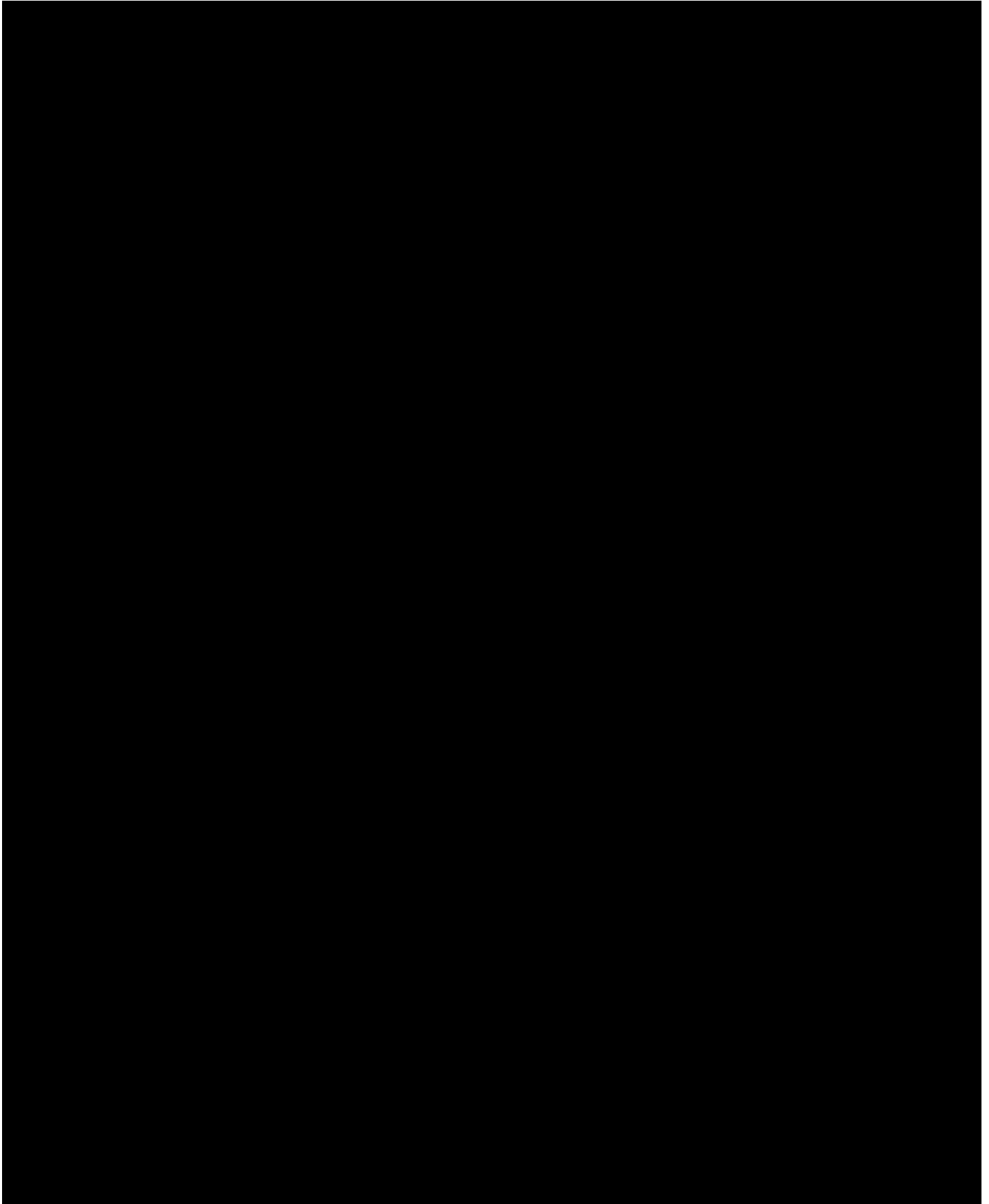
A handwritten signature in black ink, appearing to read "Craig Eaton", is written over a horizontal line. The signature starts with a long diagonal stroke from the bottom left, crosses the line, and continues with a horizontal stroke to the right.

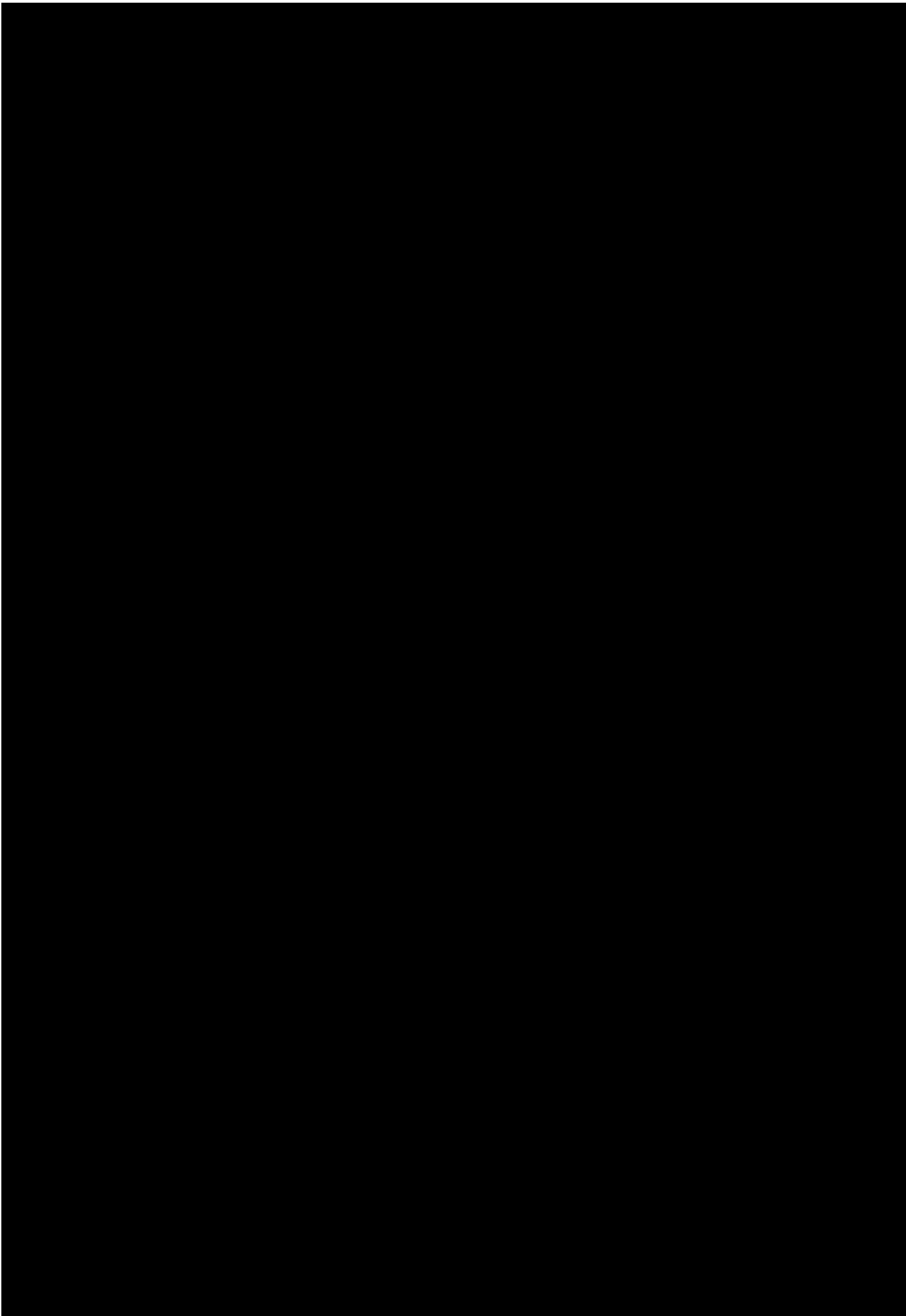
Name: Craig Eaton
Title: Authorized Person

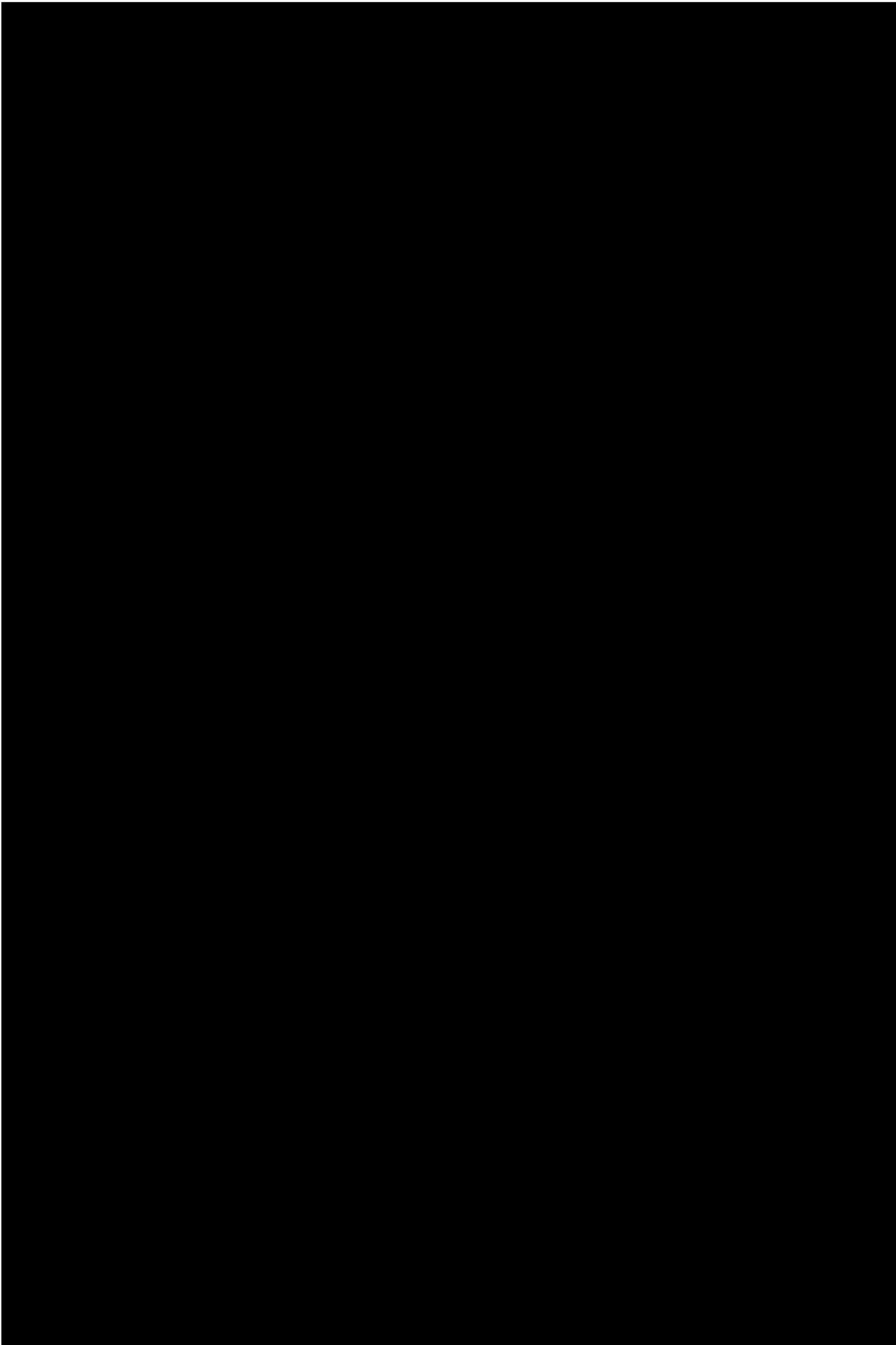
Exhibit 4.14d

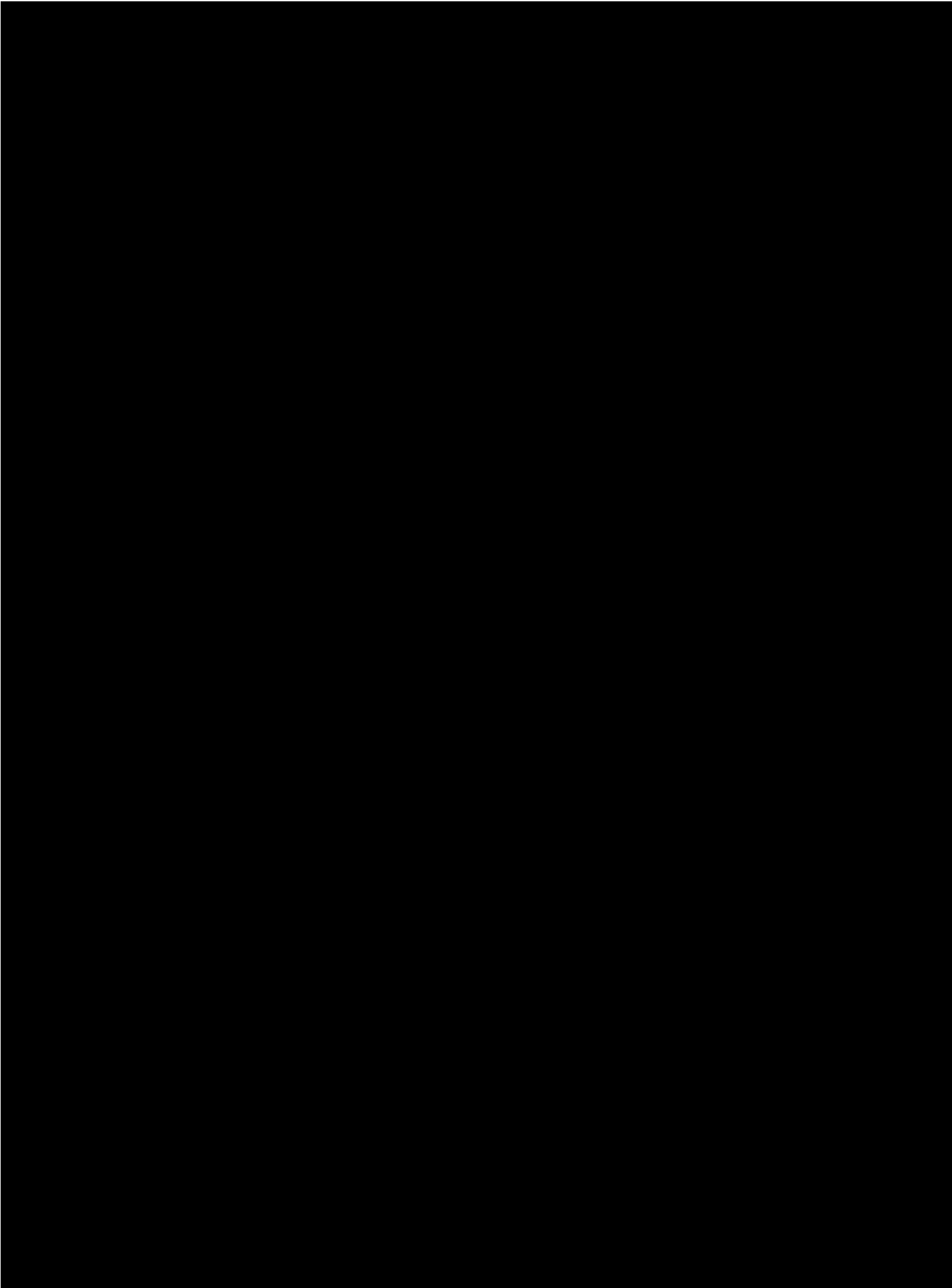
OPERATING AGREEMENT

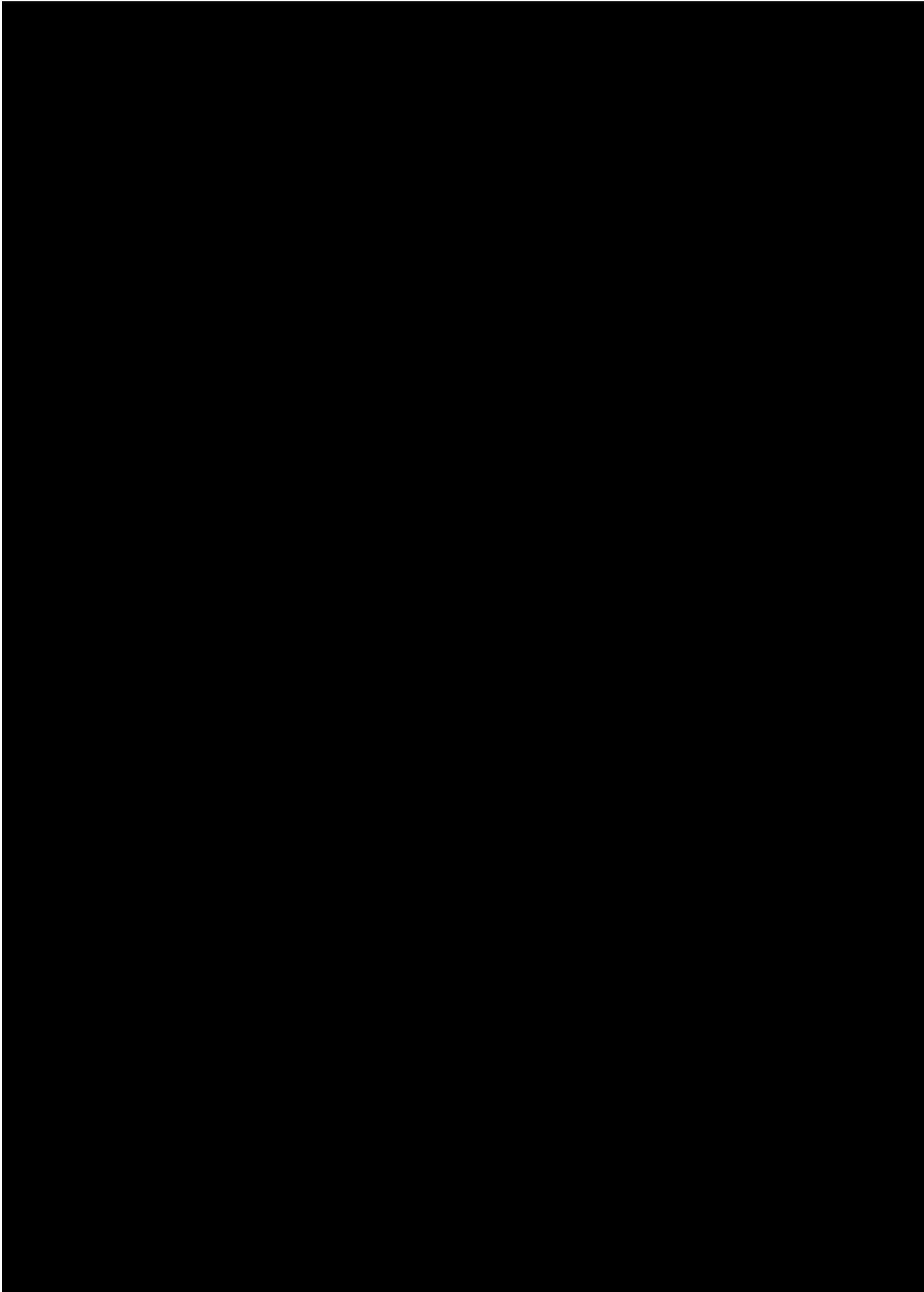
OF

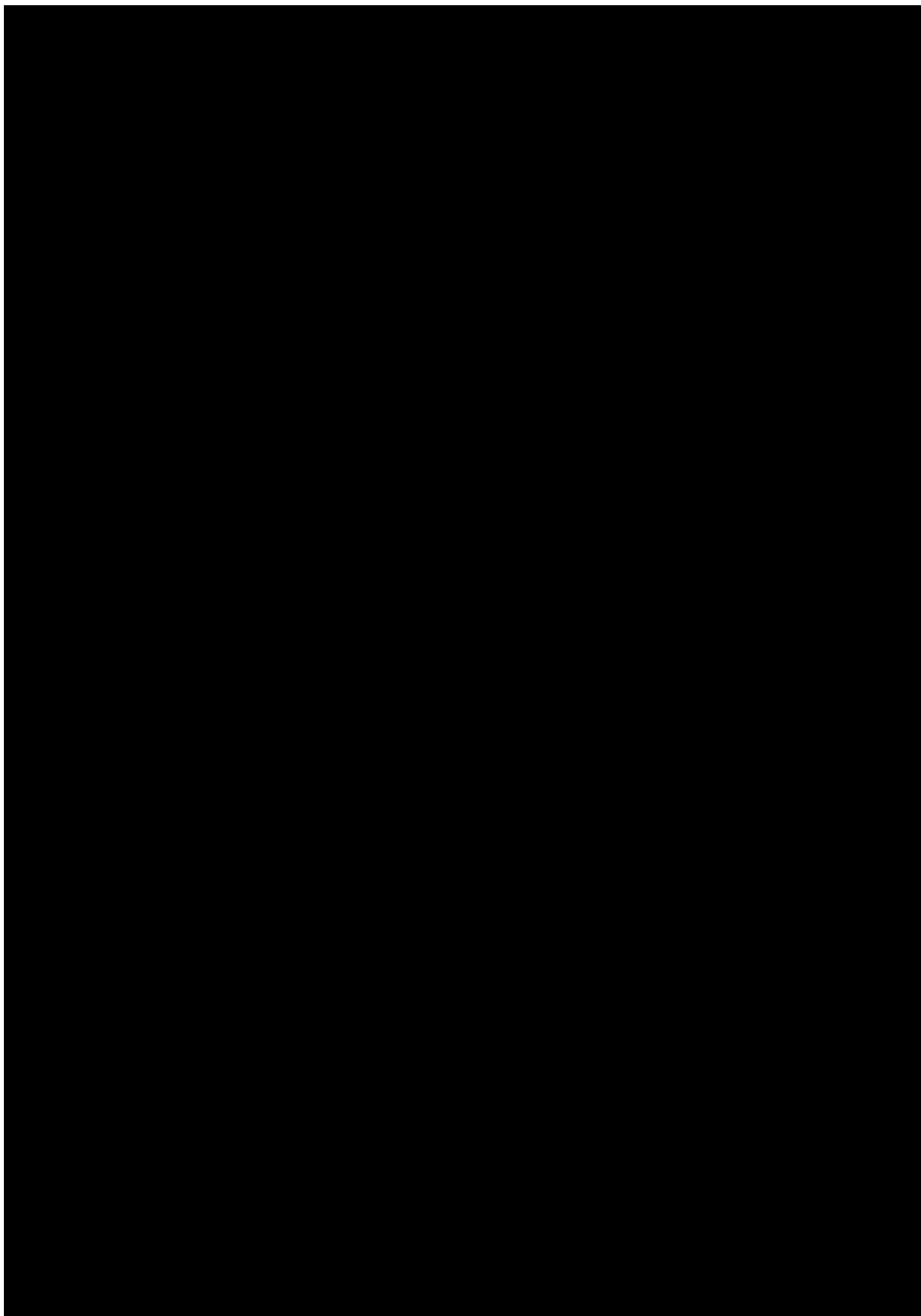


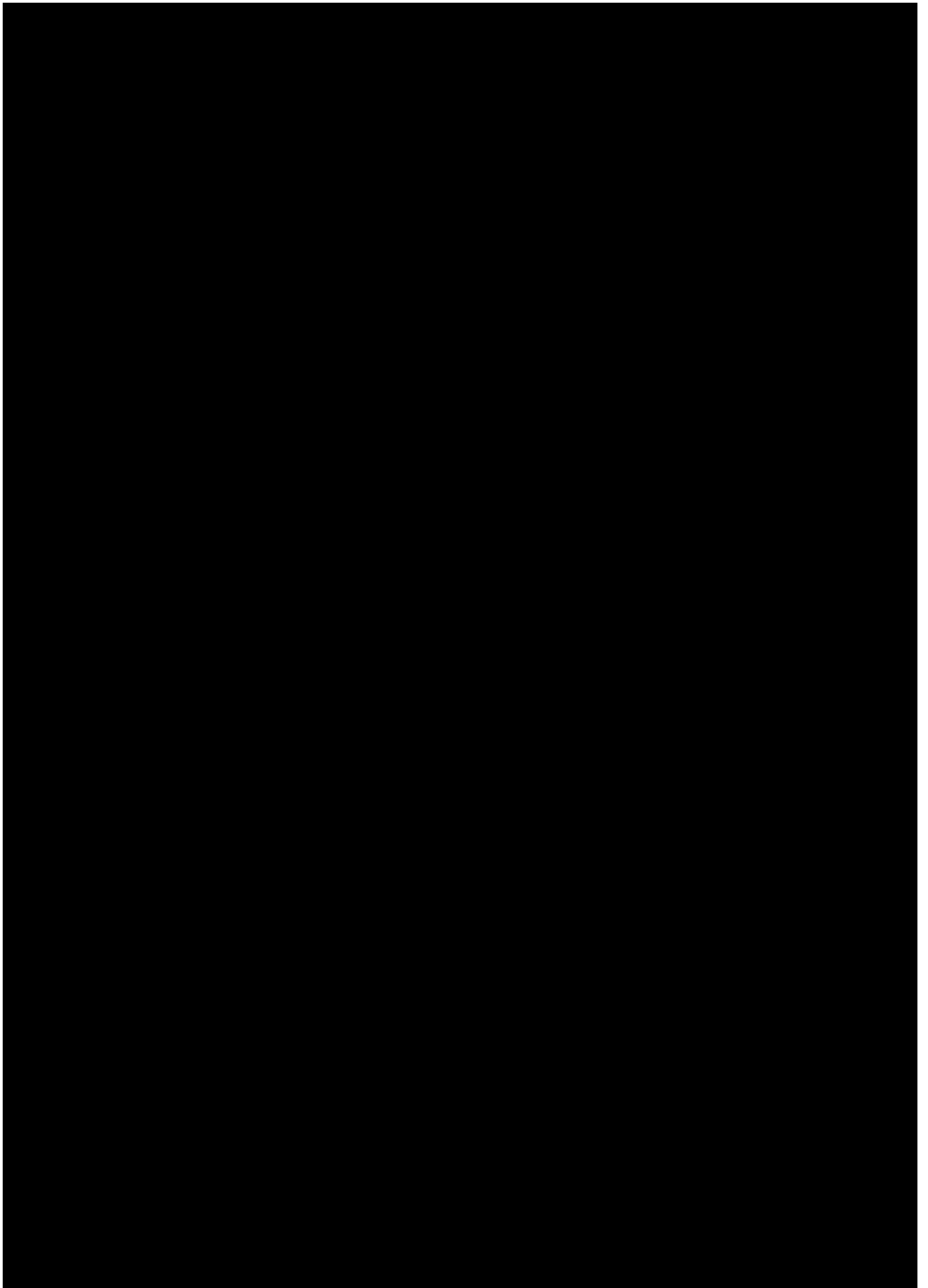


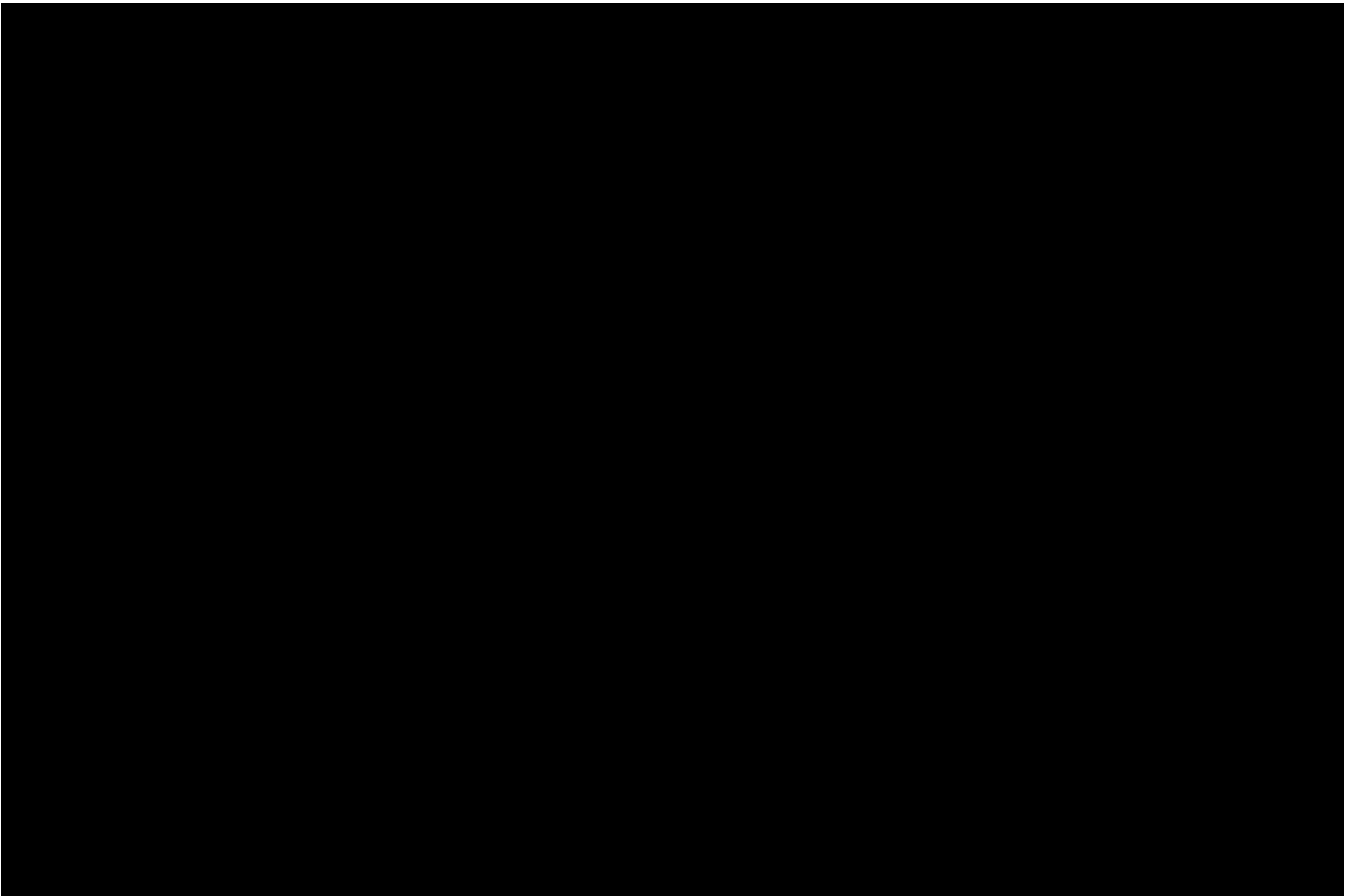













[Redacted]

SOLE MEMBER:

By: _____

Name: Craig Eaton

Title: Executive Vice President, General
Counsel and Secretary

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

5.4

5.4 APPLICANT AS AN OPERATOR

If the Applicant intends also to be an Operator tied to the Application, the Applicant must identify itself as such.

We the Applicant (Bally's Interactive, LLC) are also intending to be the Operator, d/b/a "Bally Bet" utilizing the Bet.Works Platform. Betworks (US) LLC, is a 100% subsidiary of the Applicant, Bally's Interactive, LLC.

5.5

5.5 LICENSURE

Each Operator must be licensed as a Mobile Sports Wagering Licensee, separate from the Mobile Sports Wagering License issued to the Platform Provider. The standard for licensing shall be equivalent to that of a Casino Vendor Enterprise pursuant to PML Article 13 Title 4 – Enterprise and Vendor Licensing and Registration.

Bally Bet will apply for the Mobile Sports Wagering License as an Operator in the state of New York if/when we are chosen as one of the successful applicants from the RFA process.

5.6

5.6 ADVERTISING AND PROMOTIONAL PLANS

The Applicant shall provide detailed information demonstrating the marketing and promotion efforts proposed by its Operators, including:

- estimated marketing budget;
- promotion and player loyalty programs;
- advertising plans;
- player acquisition models; and
- efforts to be undertaken to convert customers from wagering through unlicensed channels to wagering legally in the State.

The Applicant shall provide examples and samples of marketing, advertising, and promotional activities recently undertaken in other jurisdictions by each of the proposed Operators in the Application.

Bally's advertising and promotional plan is attached here as Exhibit 5.6a.

Exhibit 5.6a



Marketing and Advertising

Bally's will use an integrated approach to marketing and advertising in New York, understanding the expanded consumer touchpoints brought on by advancements in digital media as well as our industry-defining partnership with Sinclair Broadcast Group. As we believe our gaming entertainment ecosystem will become the broadest and most comprehensive in the industry, our approach will be best-in-class and, as such, include restrictions on target audiences, outlets, and branding, while mandating the inclusion of responsible gaming in all marketing activities.

Bally's will execute a comprehensive advertising and marketing plan [REDACTED]

The history of the Bally's brand is of significance as well as our recent mergers and acquisitions activity that has led to our ownership of 16 casinos in 11 states, with access to online sports betting licenses in 15 states.

In a 2021 study conducted by consultancy Interbrand, publishers of the annual Best Global Brands Report, respondents expressed a [REDACTED] awareness level and an [REDACTED] favorability rate for the Bally's brand. Unquestionably, Bally's has a storied past and a bright future.

SINCLAIR PARTNERSHIP

A central element of our marketing strategy is our groundbreaking media partnership with Sinclair Broadcast Group.

On April 1, 2021, Sinclair rebranded the 19 regional Fox Sports networks to Bally Sports, putting the Bally's brand in the homes of approximately 80 million U.S. sports fans.

Through these popular regional sports networks, Bally Sports is the official broadcaster to more than half of the country's MLB, NBA and NHL games, offering 4,500+ live events annually.



HOUSE OF BRANDS

A 360° SALES SOLUTION POWERED BY SINCLAIR SPORTS GROUP



CAPABILITIES

THE HOUSE THAT SPORTS BUILT

Sinclair's national, regional, and omnichannel sports solutions allows brands to reach fans 365 days of the year. Our HOUSE OF BRANDS sports properties deliver 13.4 Billion impressions* and 65,000+ hours of live sports content, including the biggest events on the calendar. Whether fans watch live or stream later, catch the game at home or on the go, follow the latest sports news or just the highlights, they do it all on Sinclair.



65K
HOURS

- 190 TV Stations
- 88 DMAs
- 43.8 Million Households
- 39.8% US Households
- 43 FOX | 30 NBC | 24 CBS | 17 ABC



4.6K
LIVE GAMES

- 21 Regional Sports Networks
- 80 Million Households
- 17 NBA Teams
- 16 MLB Teams
- 12 NHL Teams



5K
LIVE EVENTS

- 10,000+ Live Hours
- 60 Million Households
- 90% of US Tennis Coverage
- 24/7 News and Unique Content on Tennis.com and Tennis Channel Plus



1.2K
LIVE GAMES

- 60 Million+ Households
- 24/7 Breaking News and Highlights Across all Collegiate and Professional Sports
- Exclusive Live NCAA Games and ACC Digital Network

REACHING
13.4B
IMPRESSIONS

5.5B*

1.1B*

103M*

305M*

58M*

358M*

3.5B*

690M*

492M*

1B*

266M*

NBA, CFB, MLB, MLB SOURCE: Nielsen Local, Gross Impressions (avg. GH Impressions multiplied by # of GH), P2+, Live+SD, Jan 2019 - Dec. 31 2019
RSN MLB, NBA, NHL SOURCE: Nielsen Local, Gross Impressions (avg GH Impressions multiplied by # of GH), P2+, Live+SD. Includes YES

* Combined Impressions

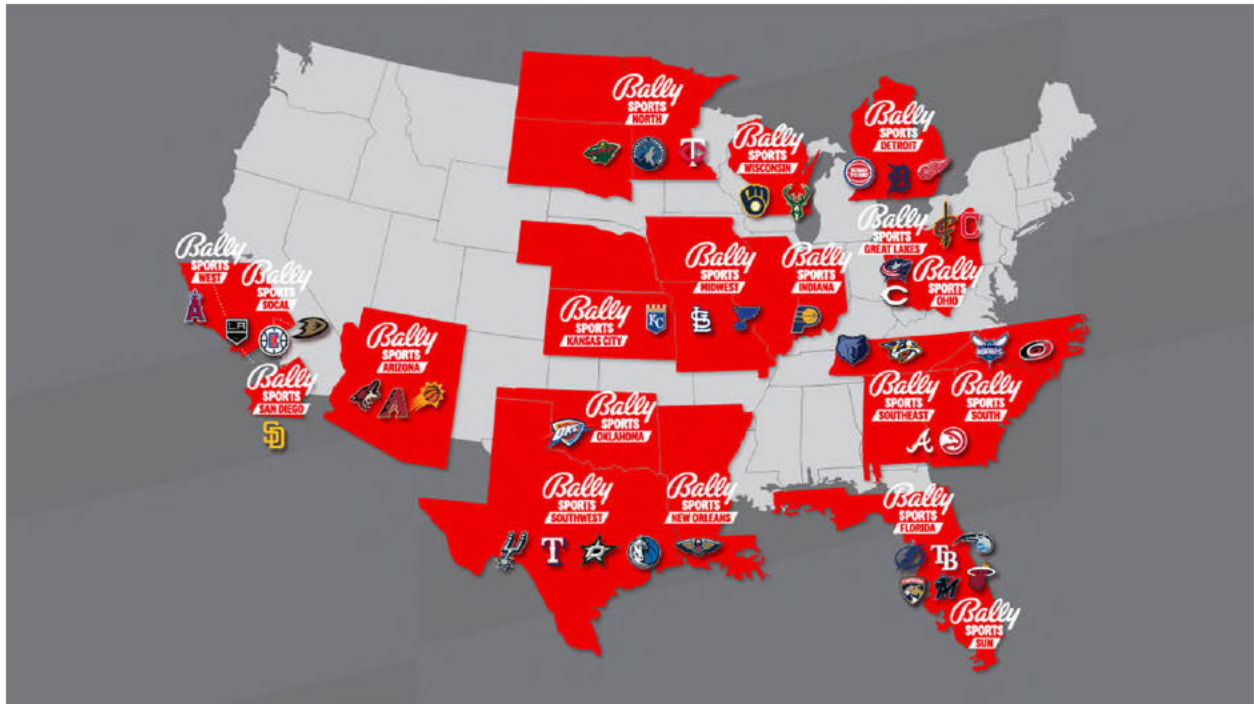


Image – Map of Sinclair RSNs



In a rapidly shifting media landscape, the Sinclair partnership gives Bally's a broad national portfolio of local broadcast stations, regional sports networks (RSNs), cable channels (e.g., Tennis Channel, Stadium), and best-in-class digital over-the-top (OTT) programming (e.g., STIRR).

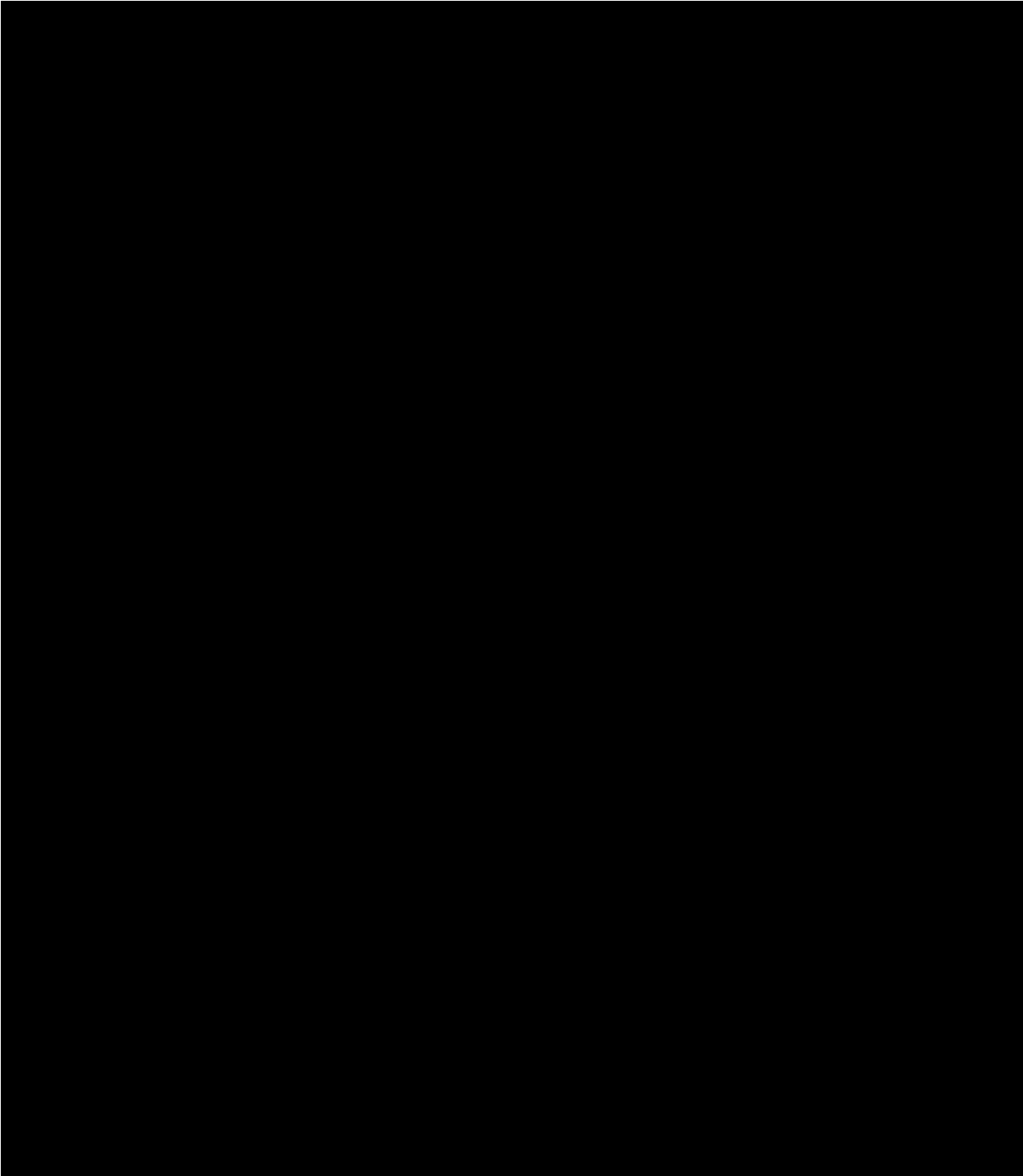


Image – Anchor Desk at Bally Sports



Image – Anchor Desk at Bally Sports





LOCAL NEWS POWERHOUSE

In New York, Sinclair Broadcast Group owns and operates the following stations:

Sinclair TV Markets in the State of New York

20'-21 Nielsen Rank	DMA	TV HH in NY	% of DMA in NY	TV Station(s)	Total TV HH in DMA
53	Buffalo, NY	591,140	96.5%	WUTV (FOX) WNYO-TV (MyNetwork TV)	612,780
60	Albany-Schenectady-Troy, NY	490,060	88.0%	WRGB (CBS) WFXL (FOX) WCWN (CW)	556,730
77	Rochester, NY	412,190	100.0%	WUHF (FOX) WHAM-TV (ABC)	412,190
87	Syracuse, NY	373,320	100.0%	WSTM-TV (NBC) WTVH (CBS) WSTQ-LP (CW)	373,320
	Total	1,866,710	95.5%		1,955,020

Source: Nielsen 2020-21 TV household estimates which include broadband-only TV homes

Note: 95.5% represents the % of the DMA's audience in NY state and not coverage of the entire state.



Image – Bally Franchise News Segment on KGAN Iowa



REGIONAL SPORTS NETWORKS

[REDACTED]

[REDACTED]

The combination of Bally Sports RSNs outside of New York with the YES Network and Sinclair local stations in New York state gives Bally's the strongest media footprint of any sports betting operator. All told, Bally's has access to 70% of television households in the US.

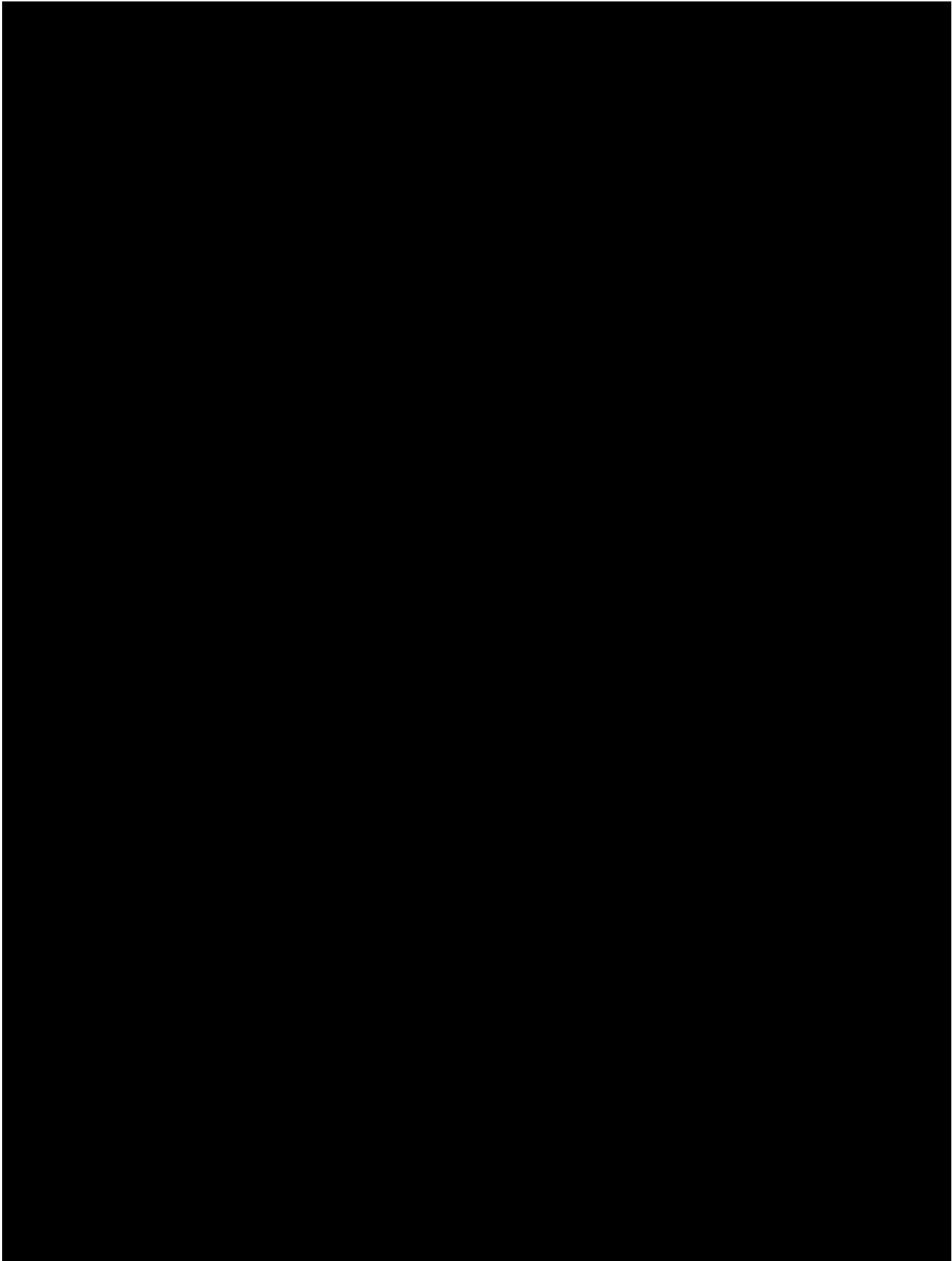
TENNIS CHANNEL

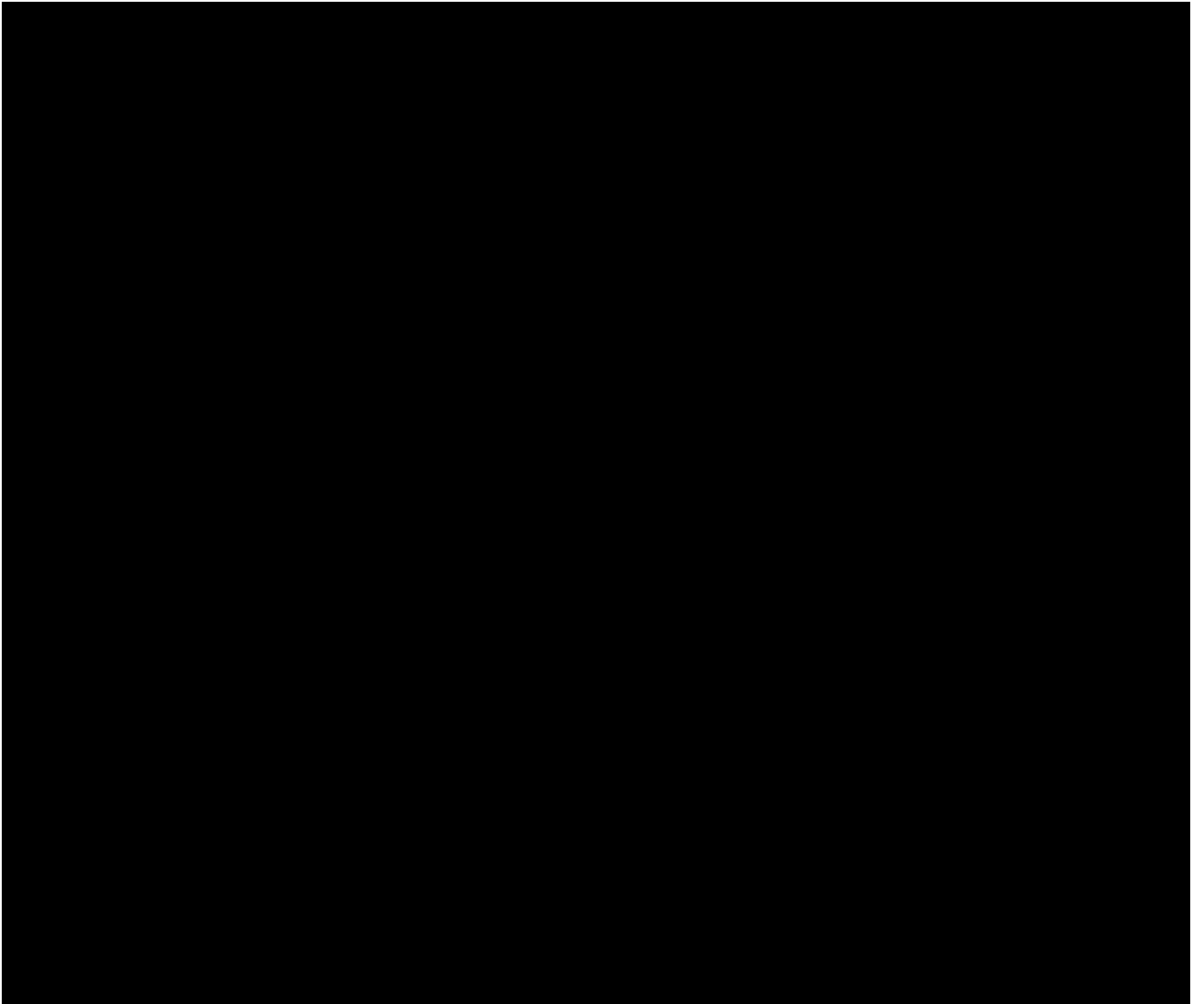
[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]





CREATIVE EXAMPLES



ATLANTIC CITY HOTEL/CASINO



In addition to our broadcast, out-of-home, and digital marketing efforts, we will leverage our ownership of the famed Bally's Atlantic City Casino Resort.

