

PLATFORM APPLICATION INFORMATION

4.1 EXECUTIVE SUMMARY

Note: Both the platform applicant and operator applicant are the same entity -- Hillside (New York) LLC. Furthermore, Hillside (New York) LLC is a subsidiary of bet365 Group Ltd., as described later in this part. The platform applicant will also serve as its own operator and do business as bet365. For purposes of uniformity, we will refer from this point forward to both the applicant and its parent company collectively as “bet365” or any second-person references (“we,” “our” etc.) therein. We also refer to all forms of online or mobile sports betting as “mobile sports wagering” per the Commission’s terminology.

First and foremost, we’d like to thank the New York Gaming Commission (herein referred to as “the Commission”) for the opportunity to apply for a mobile sports wagering license and tell you a bit more about bet365.

To start, we are the largest mobile sports wagering brand in the world.

We are a private company based in Stoke-on-Trent, United Kingdom, that was founded by a sister and brother, Denise and John Coates, in 2000. We took our first mobile sports wager in 2001, operating with eight employees out of a portable office, and have since grown to [REDACTED] employees with [REDACTED] 63 million registered customers.

[REDACTED]

[REDACTED]

Our mobile sports wagering platform is available in 21 different languages, and supports 24 deposit currencies via over 35 different payment methods. Having the most sporting events for customers to stream, the most expansive wagering markets, and most languages for customers of any platform allows us to offer an unparalleled level of customer choice.

We do not operate any retail or brick-and-mortar wagering. Our product is particularly optimized for app-based wagering on mobile phones and tablets. More than four out of every five wagers we accepted worldwide in 2020 were made from phones or tablets, as opposed to laptop or desktop computers. Having 63 million registered customers around the world means that we deal with, and accommodate, an enormous amount of traffic on our platform. [REDACTED]

We have long excelled at optimizing the in-play sports wagering product, or the menu of wagers we offer on a game or match while that game or match is already underway. [REDACTED]

When our customers think of us, they think of live sports. This is because of our marketing and advertising deployments around the world, which for 20 years have focused on brand visibility as close to the field of play as possible. We plan to market to mobile sports wagering customers in New York through four main channels: brand, paid media, partnerships (previously known as affiliates), and social media. We develop value-driven customer outreach and marketing initiatives to bring the action, and our product, nearer to our customers’ fingertips. We partner with major sports franchises and leagues as well as on a local level. Our signage at Yankee Stadium and at Citi Field reaches customers before, during, and after games. Paid social media activity aligns the brand to the latest trends and news in mobile sports wagering. Search engine optimization helps us target and outsell our competition. Our pricing structure and acquisition strategy, further detailed in Section 5.6, allow us to offer a compelling alternative to unlicensed competitors in developing mobile sports wagering markets.

[REDACTED]

[REDACTED]

Unlike many other operators, we develop, maintain and innovate nearly every aspect of our mobile sports wagering technology platform in-house, without needing to rely entirely on third-party vendors. Our technology platform is powered by our own in-house trading and risk management teams, our own customer account management system, our extensive fraud, customer service and AML teams, our in-house developed in-play wagering product, as well as a suite of industry-leading responsible gaming features. The stability of our technology stack means we have an established track record of processing large mobile sports wagering volumes during major sporting events, when traffic for most operators is at its peak. Our capability, experience, and our institutional knowledge it fosters, allows bet365 to be the world leader in mobile sports wagering.

The backbone of any successful gaming jurisdiction is a set of regulations which are comprehensive without being restrictive. We have reviewed the mobile sports wagering regulations for New York under Part 5330, and we are confident in our ability not only to meet the standards as written, but exceed them with the insight and operational knowledge that only twenty years of global expertise across multiple geographies can provide.

Preserving the integrity of mobile sports wagering and our customers is vital to our operation. bet365 takes identity verification very seriously and has robust systems and processes (along with exceptionally qualified personnel) in place to monitor for structured sports wagers or suspicious wagering activity. We are diligent and precise in protecting our intellectual property as well as the sensitive data and information of our partners and our customers.

We have extensive experience launching in jurisdictions across the world, as well as in the U.S.

We have operated mobile sports wagering and online casino gaming in New Jersey for nearly two years and in that time have substantially grown our mobile sports wagering market share. Our product has already been recognized by industry stakeholders ranging from eGaming Review (EGR), Sports Betting Community (SBC) and Eilers & Krejcik Gaming. [REDACTED]

[REDACTED] Among these investment efforts are a major investment in the delivery of our sports wagering content, the bolstering of our already robust global hardware infrastructure to ensure stability and speed-to-market, and advancements to our software to allow even greater flexibility in jurisdictional and regional personalization.

We fully expect to operate over the next 20 years in the same manner as we have for the last 20 – privately owned and family owned, exclusively using our own brand, and with an innovative, mobile-first product that takes customer protections very seriously. The longevity we have had thus far, and that we believe we will continue to have, is attributable to several factors. Above all, it is perhaps most attributable to our extremely strong financial standing. [REDACTED]

We have no plans to sell the company, merge the company, or to take the company public. All of these factors contrast sharply with many of our competitors who are highly leveraged and dependent on outside investment to maintain their business and fund operations. Being completely debt-free allows us the financial stability and flexibility to sustain operations however we need to, without relying on outside investments. If licensed, bet365 would be an operator that is “in it for the long haul” in New York, with very little likelihood of a merger or acquisition resulting in the loss of our license, and an even lower risk of financial instability that could threaten our operational ability. In a market that is constantly evolving and still in its infancy in the U.S., we’re not going anywhere.

Having this long-term focus allows us to take a long-term approach to building our brand in new markets. This is important because it allows us to play our part in fostering what we will refer to throughout this document as Sustainable Markets, which drive long-term revenue and protect mobile sports wagering customers. We don’t need or wish to bombard customers with untruthful advertising or deceptive promotions that end up causing harm and casting a negative light over the industry. We believe a conscientious, truthful and disciplined approach to responsible gaming and responsible advertising is critical to helping the New York market avoid missteps that have occurred in other markets.

We believe that our two decades of success helping foster these types of Sustainable Markets combined with our proprietary, in-house technology platform gives us market-leading experience. We also believe it makes us best-suited to contribute to an enduring New York mobile sports wagering market, while also providing a superior and competitive mobile sports wagering experience for New Yorkers.

Our dedication to Sustainable Markets has heavily informed our approach to the requested pricing matrix in Section 6.8.

[Redacted text block]

[Redacted text block]

[Redacted text block]

[Redacted text block]

[Redacted text block]

We look forward to describing our company's values and operations in further detail in the forthcoming pages, and we thank you for your consideration.

4.2 NAME OF THE APPLICANT

The applicant that is submitting the response to this RFA is Hillside (New York) LLC and if selected and granted a license will operate under the trade name of bet365.

4.3 CONTACT PERSON

The person that should be contacted regarding any questions related to this application is as follows:

Will Green
Head of Development – U.S.



4.4 LOCATION OF THE APPLICANT'S PRINCIPAL PLACE OF BUSINESS

The principal place of business for Hillside (New York) LLC is 9000 Lincoln Drive East, Suite 200, Marlton, New Jersey 08053.

4.5 TYPE OF BUSINESS FORMATION

Hillside (New York) LLC is a limited liability company that was formed in the state of Delaware. Hillside (New York) LLC's Federal Tax Identification Number is [REDACTED]. Attached for reference as Appendices A3, A4 and A5, please find the Certificate of Formation, the Employer Identification Number documentation and a Certificate of Good Standing.

4.6 TABLE OF OWNERSHIP

A chart showing the corporate ownership structure of Hillside (New York) LLC is attached for reference as Appendix A6. That chart shows that Hillside (New York) LLC is owned by a series of holding companies that are wholly owned by bet365 Group Ltd., a UK entity.

Further, another chart showing the shareholders of bet365 Group Ltd. is also attached for reference as Appendix A7. That chart shows that there are five shareholders that own bet365 Group Ltd. [REDACTED]

Finally, an organization chart has been attached as for reference as Appendix A8 which shows the all entities that make up bet365 and support our operations worldwide.

4.7 ORGANIZATIONAL CHART

An organizational chart showing the key employee identified as needing a license, as well as the staff positions present in the office that will support operations of the applicant is attached for reference as Appendix A9 for your review.

4.8 NAMES, ADDRESSES AND EXPERIENCE OF DIRECTORS AND OFFICERS

The sole Director of Hillside (New York) LLC is David Crupi. David also serves as the President, Secretary and Treasurer of the applicant and his CV has been attached for reference as Appendix A10.

bet365 Group Ltd., the ultimate 100% owner of Hillside (New York) LLC has four Directors. Those Directors are Denise Coates, John Coates, Peter Coates and Will Roseff. Their respective CVs have been attached for reference as Appendices A11 – A14.

The names, addresses and title of the applicable directors is listed below.

Denise Coates

bet365 House, Media Way, Stoke-on-Trent, United Kingdom, ST1 5SZ, Joint CEO

John Coates

bet365 House, Media Way, Stoke-on-Trent, United Kingdom, ST1 5SZ, Joint CEO

Peter Coates

bet365 House, Media Way, Stoke-on-Trent, United Kingdom, ST1 5SZ, Chairman

William Roseff

bet365 House, Media Way, Stoke-on-Trent, United Kingdom, ST1 5SZ, Group Finance Director

David Crupi

9000 Lincoln Drive East, Suite 200, Marlton, New Jersey 08053, President, Secretary and Treasurer of Hillside (New York) LLC, Hillside (US New Media) LLC and Hillside (New Media Holdings US) Inc., Head of Sportsbook Operations

4.9 LOBBYIST REGISTRATION REQUIREMENT

Any lobbying done on behalf of Hillside (New York) LLC in the state of New York has been done by Stuart Shorenstein of New York Public Strategies/Cozen O'Connor. Mr. Shorenstein and Hillside (New York) LLC have complied with all registration requirements in the state of New York.

The required lobbying registration form has been filled out and executed and is attached for reference as Appendix A15 for your review.

4.10 NAMES, ADDRESSES AND OWNERSHIP AND OTHER INTERESTS

Hillside (New York) LLC is owned by a series of holding companies that are wholly owned by bet365 Group Ltd., a UK entity. bet365 Group Ltd., is privately owned by five shareholders. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

4.11 CONFLICTS OF INTEREST

The applicant does not have any current relationships or affiliations, nor has it had any relationships or affiliations within the past five years, with any member, employee, consultant or agent of the Commission that is a conflict of interest or could be perceived as a conflict of interest during the RFA process. If such conflict does arise during the RFA process the applicant will notify the Commission immediately in writing.

4.12 PUBLIC OFFICIALS

The applicant does not have any information to disclose related to this item. If circumstances were to change that would require disclosure of information pursuant to this request, the applicant will immediately notify the Commission.

4.13 CONTRACTS WITH THE STATE OF NEW YORK

The applicant and its affiliates do not have, nor have they in the past had, any contracts issued by or under, any department or agency of the state of New York.

4.14 ORGANIZATIONAL DOCUMENTS

4.14.A CERTIFIED COPY OF EACH RELEVANT CERTIFICATE OF INCORPORATION, ARTICLES OF INCORPORATION OR CORPORATE CHARTER

Hillside (New York) LLC	Not Applicable
Hillside (US New Media) LLC	Not Applicable
Hillside (New Media Holdings US) Inc.	Certified copy of Hillside (New Media Holdings US) Inc. attached for reference as Appendix A16.
Hillside (New Media Holdings) Ltd.	Certified copy of Hillside (New Media Holdings) Ltd. Incorporation Certificate attached for reference as Appendix A17.
bet365 Group Ltd.	Certified copy of bet365 Group Ltd. Certificate of Incorporation attached for reference as Appendix A18.

4.14.B **BY-LAWS AS AMENDED THROUGH THE DATE OF THE APPLICATION**

Hillside (New York) LLC	Not Applicable
Hillside (US New Media) LLC	Not Applicable
Hillside (New Media Holdings US) Inc.	Bylaws for Hillside (New Media Holdings US) Inc. attached for reference as Appendix A19.
Hillside (New Media Holdings) Ltd.	Certified copy of Hillside (New Media Holdings) Ltd. Articles of Association attached for reference as Appendix A20.
bet365 Group Ltd.	Certified copy of bet365 Group Ltd. Articles of Association attached for reference as Appendix A21.

4.14.C **CERTIFIED COPY OF ITS CERTIFICATE OF FORMATION OR ARTICLES OF ORGANIZATION OF A LIMITED LIABILITY COMPANY**

Hillside (New York) LLC	Certified copy of Hillside (New York) LLC Certificate of Formation attached for reference as Appendix A22.
Hillside (US New Media) LLC	Certified copy of Hillside (US New Media) LLC Certificate of Formation attached as for reference as Appendix A23.
Hillside (New Media Holdings US) Inc.	Not Applicable
Hillside (New Media Holdings) Ltd.	Please refer to A and B above
bet365 Group Ltd.	Please refer to A and B above

4.14.D **LIMITED LIABILITY COMPANY AGREEMENT OR OPERATING AGREEMENT AS AMENDED THROUGH THE DATE OF THE APPLICATION**

Hillside (New York) LLC	Limited liability company agreement for Hillside (New York) LLC attached for reference as Appendix A24. Resolutions that have been adopted and impact the operation of Hillside (New York) LLC are attached for reference as Appendices A28, A29 and A30 to the information submitted for Hillside (New Media Holdings US) Inc.
Hillside (US New Media) LLC	Limited liability company agreement for Hillside (US New Media) LLC attached as for reference as Appendix A25. Resolutions that have been adopted and impact the operation of Hillside (US New Media) LLC are attached for reference as Appendices A28, A29 and A30 to the information submitted for Hillside (New Media Holdings US) Inc.
Hillside (New Media Holdings US) Inc.	Not Applicable
Hillside (New Media Holdings) Ltd.	Not Applicable
bet365 Group Ltd.	Not Applicable

4.14.E **CERTIFIED COPY OF EACH RELEVANT CERTIFICATE OF PARTNERSHIP**

Hillside (New York) LLC	Not Applicable
Hillside (US New Media) LLC	Not Applicable
Hillside (New Media Holdings US) Inc.	Not Applicable
Hillside (New Media Holdings) Ltd.	Not Applicable
bet365 Group Ltd.	Not Applicable

4.14.F **PARTNERSHIP AGREEMENT AS AMENDED THROUGH THE DATE OF THE APPLICATION**

Hillside (New York) LLC	Not Applicable
Hillside (US New Media) LLC	Not Applicable
Hillside (New Media Holdings US) Inc.	Not Applicable
Hillside (New Media Holdings) Ltd.	Not Applicable
bet365 Group Ltd.	Not Applicable

4.14.G **CERTIFIED COPY OF EACH RELEVANT CERTIFICATE OF LIMITED PARTNERSHIP**

Hillside (New York) LLC	Not Applicable
Hillside (US New Media) LLC	Not Applicable
Hillside (New Media Holdings US) Inc.	Not Applicable
Hillside (New Media Holdings) Ltd.	Not Applicable
bet365 Group Ltd.	Not Applicable

4.14.H **LIMITED PARTNERSHIP AGREEMENT AS AMENDED THROUGH THE DATE OF THE APPLICATION**

Hillside (New York) LLC	Not Applicable
Hillside (US New Media) LLC	Not Applicable
Hillside (New Media Holdings US) Inc.	Not Applicable
Hillside (New Media Holdings) Ltd.	Not Applicable
bet365 Group Ltd.	Not Applicable

4.14.1 **OTHER LEGAL INSTRUMENTS OF ORGANIZATION**

Hillside (New York) LLC	Not Applicable
Hillside (US New Media) LLC	Not Applicable
Hillside (New Media Holdings US) Inc.	Organizational Consent and Consent of Sole Incorporator for Hillside (New Media Holdings US) Inc. attached for reference as Appendices A26 and A27. Also, resolutions that have been adopted and impact the operation of all U.S. entities are attached for reference as Appendices A28, A29 and A30.
Hillside (New Media Holdings) Ltd.	Not Applicable
bet365 Group Ltd.	Not Applicable

4.14.J **JOINT VENTURE AGREEMENT**

Hillside (New York) LLC	Not Applicable
Hillside (US New Media) LLC	Not Applicable
Hillside (New Media Holdings US) Inc.	Not Applicable
Hillside (New Media Holdings) Ltd.	Not Applicable
bet365 Group Ltd.	Not Applicable

4.14.K **TRUST AGREEMENT OR INSTRUMENT, EACH AS AMENDED THROUGH THE DATE OF THE APPLICATION**

Hillside (New York) LLC	Not Applicable
Hillside (US New Media) LLC	Not Applicable
Hillside (New Media Holdings US) Inc.	Not Applicable
Hillside (New Media Holdings) Ltd.	Not Applicable
bet365 Group Ltd.	Not Applicable

4.14.L **VOTING TRUST OR SIMILAR AGREEMENT**

Hillside (New York) LLC	Not Applicable
Hillside (US New Media) LLC	Not Applicable
Hillside (New Media Holdings US) Inc.	Not Applicable
Hillside (New Media Holdings) Ltd.	Not Applicable
bet365 Group Ltd.	Not Applicable

4.14.M **STOCKHOLDER, MEMBER OR SIMILAR AGREEMENT**

Hillside (New York) LLC	Not Applicable
Hillside (US New Media) LLC	Not Applicable
Hillside (New Media Holdings US) Inc.	Stock Certificate for Hillside (New Media Holdings US) Inc. attached as Appendix A31.
Hillside (New Media Holdings) Ltd.	Not Applicable
bet365 Group Ltd.	Not Applicable