

SUB-BINDER 2

Part 6 – Applicant Technical Proposal

PLATFORM PROVIDER APPLICANT TECHNICAL

PROPOSAL

Application of Caesars

JOINT BID CONSORTIUM

Primary Applicant

Kambi

Applicants

CAESARS.
SPORTSBOOK **POINTS**BET

 Resorts World™

RUSH STREET
INTERACTIVE **wynn**BET

**New York State
Gaming Commission**

**Request for Applications for Mobile Sports Wagering
Platform Providers**

**PART 6 – APPLICANT
TECHNICAL PROPOSAL**

**CAESARS
SPORTSBOOK**

August 2021

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This Part provides the requirements for development of the technical proposals, explains the proposal clarification process, and outlines the Application submission process. In preparation of the proposal, the Applicant should pay special attention to the requirements and information being requested to respond fully to the RFA. In cases where multiple Platform Providers and/or Operators are included in an Application, the Applicant shall provide information required by this Part in context of and including all Platforms and Operators.

6.1 EXPERIENCE

A. The Applicant shall provide a description of comparable mobile sports wagering platforms developed and operated by the Applicant. Multiple examples may be used to demonstrate experience, but the Applicant shall limit detailed examples to no more than the five most comparable Platform operations. The description shall include the following:

An overview of the wagering activity conducted through the Platforms

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Just 100 days after the acquisition, on August 2, 2021, Caesars launched a nationwide upgrade and rebrand of the William Hill US app in eight states, providing a highly elevated experience for customers under the Caesars Sportsbook brand. Since the acquisition, Caesars has invested significant capital into the technology and integration with Caesars Rewards to relaunch Caesars Sportsbook. Caesars plans to complete the full migration of all its operational states remaining on the legacy William Hill platform within the next 12 months and has resources earmarked to launch quickly in all new markets, including New York.

Caesars currently operates mobile sports betting on its Liberty platform in the following eight U.S. jurisdictions:

- Colorado
- Indiana
- Iowa
- Michigan
- New Jersey
- Tennessee
- Virginia
- West Virginia

Comparable Platform Operations

We selected the following state deployments on the Liberty platform due to their size or likely similarity to the New York market:

New Jersey

In September 2018, the William Hill app launched, following approval from the New Jersey Division of Gaming Enforcement. Today, the newly relaunched Caesars Sportsbook app, built on Caesars' proprietary Liberty platform, offers New Jersey customers a broad and deep array of markets and bet types, quick and secure registration process, and a wide range of options to deposit and withdraw funds.

Caesars also operates four retail sportsbooks across the Garden State, including at Monmouth Park Racetrack, where Caesars accepted the state's first legal sports wagers on June 14, 2018. Caesars also

operates retail sports betting at Tropicana Atlantic City, Caesars Atlantic City, and Harrah's Resort Atlantic City.

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Iowa

On August 21, 2019, Caesars' subsidiary, William Hill US, was the first operator to launch a sports betting mobile app in the state under the William Hill brand, following approval of the Iowa Racing and Gaming Commission.

When remote registration became permitted by the state on January 1, 2021, Caesars launched its enhanced mobile app, built on the Liberty platform.

Today, Caesars also operates six retail sportsbooks across the state. There are nearly [REDACTED] accounts on the Liberty platform in Iowa and Caesars has processed over \$374 million in wagers. Caesars' combined retail and mobile market share (based on gross revenue) since its launch is 37.4%. Caesars' mobile market share for the same period is 42.1%.

Michigan

On January 22, 2021, the first day the market opened to operators, Caesars launched its sports betting and casino app under the William Hill brand on the license of the Grand Traverse Band of Ottawa and Chippewa Indians, following approval of the Michigan Gaming Control Board.

Built on Caesars' proprietary Liberty platform, the app offers Michigan customers a wide selection of markets and bet types, including live betting and payment options.

Since launch in January 2021, Caesars' mobile sports betting revenues are \$3.0 million, with a 2.3% market share. With the acquisition of William Hill and a brand change pending after launch, there was minimal marketing and media investment after launch. This has recently changed following the rebrand of the William Hill app to Caesars, which has much higher brand awareness and a strong customer database in Michigan. Caesars is already investing significantly in customer acquisition across Michigan, and we expect our market share to grow significantly in the coming months.

Virginia

On February 3, 2021, Caesars launched a mobile sports betting app on the Liberty platform under the William Hill brand, immediately following approval of the Virginia Lottery, becoming one of the first operators to enter the market.

Virginia's proximity to Capital One Arena in Washington D.C., where Caesars has the nation's first in-arena sportsbook, under the William Hill brand, coupled with Caesars' significant D.C. market presence, enables the Company to effectively acquire customers in Virginia. Many Virginians are Washington Capitals, Wizards, and Mystics fans and are offered several exclusive advertising and promotions.

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The jurisdictions where the Applicant operates the Platforms

Caesars operates mobile sports betting on its Liberty platform in the following eight U.S. jurisdictions:

- Colorado
- Indiana
- Iowa
- Michigan
- New Jersey
- Tennessee
- Virginia
- West Virginia


In addition, Caesars expects to deploy the Liberty platform in Arizona, Louisiana, and Maryland before the end of 2021, pending regulatory approval.

Current integration of the Platforms with other wagering operators

Caesars is the only operator on the Liberty platform, as it was designed and built for Caesars' own business-to-consumer use.

The number of accounts maintained through the Platforms

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Wagering volume processed annually through the Platforms

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Additional information the Applicant believes relevant to demonstrate the Applicant's experience

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In addition to the states above on the Liberty platform, Caesars provides exclusive trading and risk management services to the Delaware Lottery and to the Rhode Island Lottery. In Delaware, there are three racetrack casinos and more than 100 Lottery retailers that have Caesars' odds originating out of its Las Vegas office. Caesars' lines also power the Sports Book Rhode Island mobile sports betting app and desktop site since William Hill won the state's RFP in 2018. Caesars also supports the Rhode Island Lottery's retail sportsbooks at Twin River Casino and Tiverton Casino.


B. For each Operator the Applicant proposes to host on the Applicant's Platform, the Applicant shall provide a description of Sports Wagering operated by the Operator. Multiple examples may be used to demonstrate experience, but the Applicant shall limit detailed examples to no more than the five most comparable Sports Wagering operations. The description shall include the following:

We have valuable experience in forming meaningful partnerships, including with Indian Tribes, that benefit the local communities and the states in which those partners reside. In the context of sports betting in New York State, as part of our bid to operate mobile sports betting in the State of New York, Caesars and our consortium partner, Wynn, maintain a robust revenue sharing arrangement with the Oneida Indian Nation (see Section 6.7). In connection with a successful bid by our consortium, both the Oneida Indian Nation and the Saint Regis Mohawk Tribe have agreed to waive certain rights aimed at enhancing the overall revenue opportunity for the State's licensed sports wagering platforms. A detailed discussion of these waivers is included in Section 6.6 and the quantitative impact on the market is estimated in Section 6.8. We believe it is important to note to the Commission that the applicability of our historical experience in mobile sports wagering to the State of New York, and thus our corresponding market share and tax revenue assumptions presume that our access to State residents is unhindered by the Oneida Indian Nation Exclusivity Zone and that we will not compete with the Oneida Indian Nation operating, on a tax-free basis, under the Most Favored Nation clause of the Oneida gaming compact.

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In addition to the Revenue Sharing Agreement set forth in Section 6.7, Caesars and Wynn have entered into certain marketing arrangements with the Oneida Indian Nation that will further support the Tribe's operations and community. These marketing arrangements will take effect as long as the Oneida Indian Nation is not operating a competing sports betting operation under the Most Favored Nation clause of the Oneida gaming compact.

The jurisdictions where the Operator is licensed and operating

Caesars processed more than **CONFIDENTIAL INFORMATION BEGINS HERE**  **CONFIDENTIAL INFORMATION ENDS HERE** in sports wagers over the past 12 months and is licensed and operating sports wagering or providing sports wagering trading and risk management services in the following 18 U.S. jurisdictions:

- Colorado
- Delaware
- Illinois
- Indiana
- Iowa
- Michigan
- Mississippi
- Nevada
- New Jersey
- New Mexico
- New York
- North Carolina
- Pennsylvania
- Rhode Island
- Tennessee
- Virginia
- West Virginia
- Washington D.C.

In addition, Caesars expect to launch sports wagering operations in Arizona, Louisiana, and Maryland in the coming months, pending regulatory approval.

New Jersey

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Nevada

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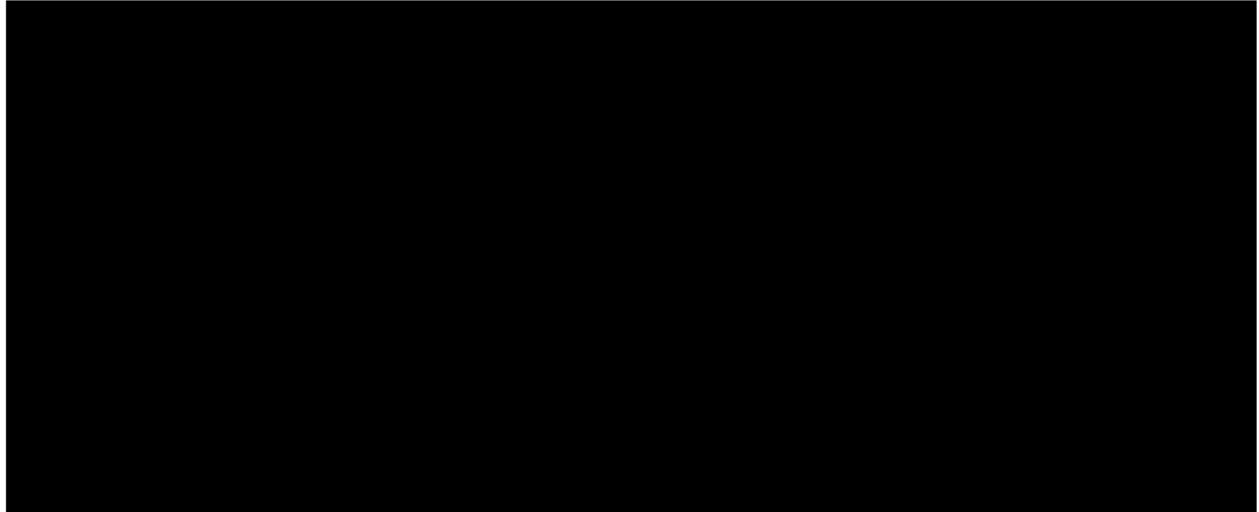
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Since Caesars' subsidiary, William Hill US, opened its first Nevada-based retail and mobile operations in 2012, it has consistently outperformed the state average, in terms of revenue margin, year after year,

resulting in more money returned to our partners at the state of Nevada. Caesars' average hold during the six years, from 2015 to 2020, was **CONFIDENTIAL INFORMATION BEGINS HERE** **CONFIDENTIAL INFORMATION ENDS HERE** greater than the rest of the sports betting operators in the state,

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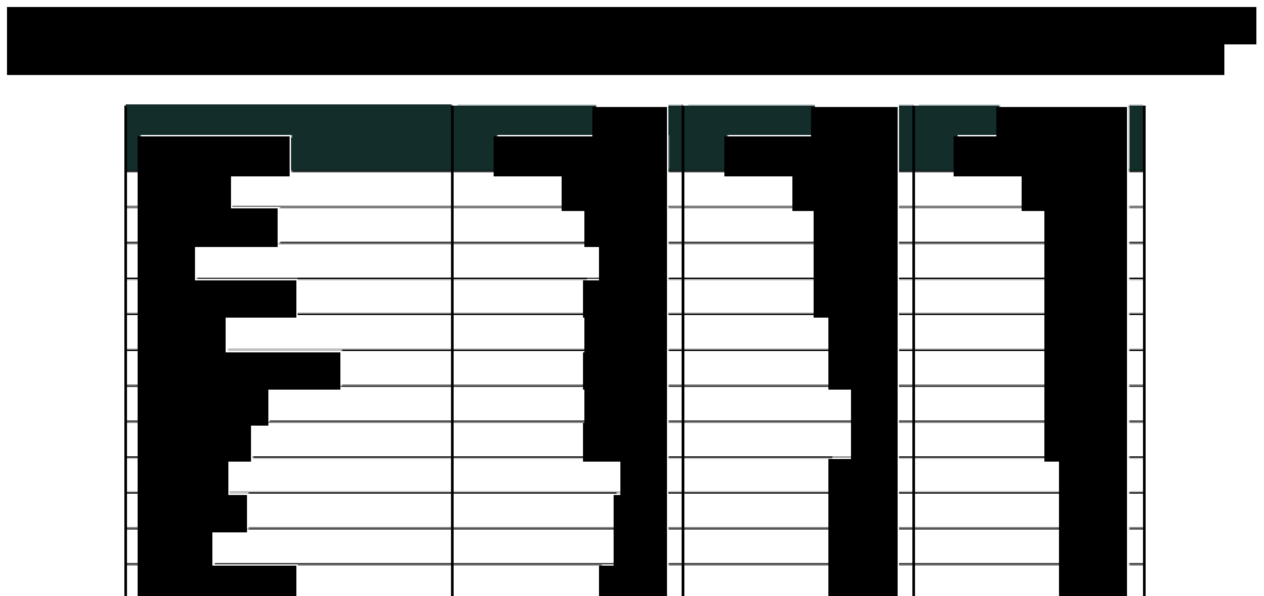


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Caesars understand the power of retail sports betting and retail partners to drive mobile sports wagering and customer acquisition. Caesars has built a loyal customer base through our omni-channel betting solution that accepts wagers through retail, mobile, and kiosk-based options across the state. Additionally, Caesars offer cash mobile account deposits at bars and taverns in Nevada through our partnership with Golden Entertainment.

Wagering volume of Sports Wagering

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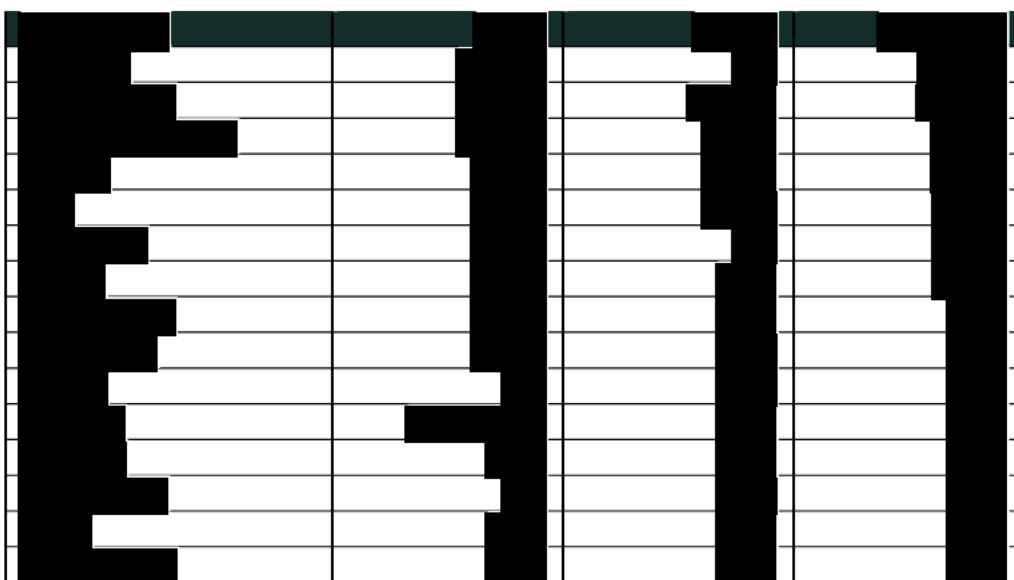
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Estimated market share within each jurisdiction

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The Platforms currently used to accept wagers

Caesars primarily uses its proprietary Liberty, sports betting technology platform.

In some jurisdictions, Caesars uses its legacy Computerized Bookmaking Systems (“CBS”) platform, but that platform is being phased out over the next 12 months and those customer accounts will be transferred to the Liberty platform.

Additional information the Applicant believes relevant to demonstrate the Operator’s experience, including, without limitation, the Operator’s experience in mobile sports wagering

Caesars Entertainment – A Rich History

Since its beginning in Reno, Nevada, in 1937, Caesars Entertainment has grown through the development of new resorts, expansions and acquisitions. Caesars Entertainment's resorts operate primarily under the Caesars, Harrah's, Horseshoe and Eldorado brand names. Caesars Entertainment offers diversified amenities and one-of-a-kind destinations, with a focus on building loyalty and value with its guests through a unique combination of impeccable service, operational excellence and technology leadership.

Caesars is the most experienced and geographically diversified gaming and hospitality operator in the world. Caesars currently owns, leases or manages 54 domestic properties in 16 states with approximately 3.6 million square feet of gaming space, approximately 64,000 slot machines, video lottery terminals (“VLTs”) and e-tables, approximately 3,000 table games.

In addition, Caesars owns, leases or manages approximately 47,000 hotel rooms and approximately 300 restaurant and bar outlets and two premier nightclubs. Caesars also has operations outside of the U.S. Caesars Entertainment generates more gaming revenue in North America than any competitor and has developed operational expertise that allows it to generate a revenue premium to its competitors. Caesars prides itself on employing the best in the industry and providing avenues for growth and upward mobility. Caesars' operational expertise is unmatched.

Caesars (formerly known as Eldorado Resorts, Inc. and other predecessor companies) was founded in 1973 by the Carano family with the opening of the Eldorado Hotel Casino in Reno.

On July 20, 2020, Eldorado Resorts, Inc. completed a merger in which a wholly-owned subsidiary of Eldorado Resorts, Inc. merged with and into Caesars Entertainment Corporation (“Former Caesars”) with Former Caesars surviving as a wholly-owned subsidiary of the Company. On April 22, 2021, Caesars Entertainment completed the purchase of William Hill PLC, which it now operates as a wholly-owned subsidiary.

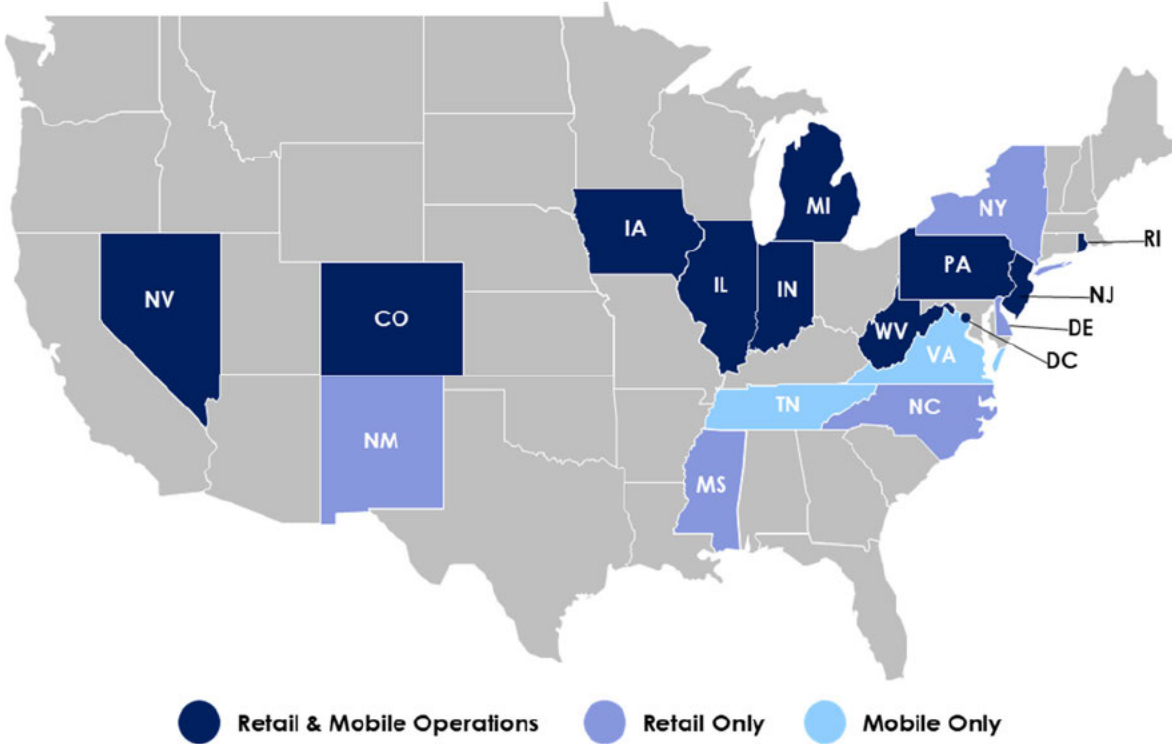
Today, Caesars has the largest footprint of any sports wagering company in the U.S. with operations in 17 states and Washington D.C. We offer mobile sports wagering in 13 states, the most of any company, and an industry-leading 174 sportsbooks.

In New York, Caesars has been providing sports betting trading and risk management services to the Oneida Indian Nation at its three casinos – Turning Stone, Yellow Brick Road and Point Place -- since 2018.

Current Operations

Caesars operates the most sportsbooks in the U.S.: 174. We have successfully launched sports betting in 18 U.S. jurisdictions with more in the works. In the last 12 months (July 2020 to June 2021), Caesars handled more than **CONFIDENTIAL INFORMATION BEGINS HERE** [REDACTED] **CONFIDENTIAL INFORMATION ENDS HERE** in legal U.S. sports wagers.

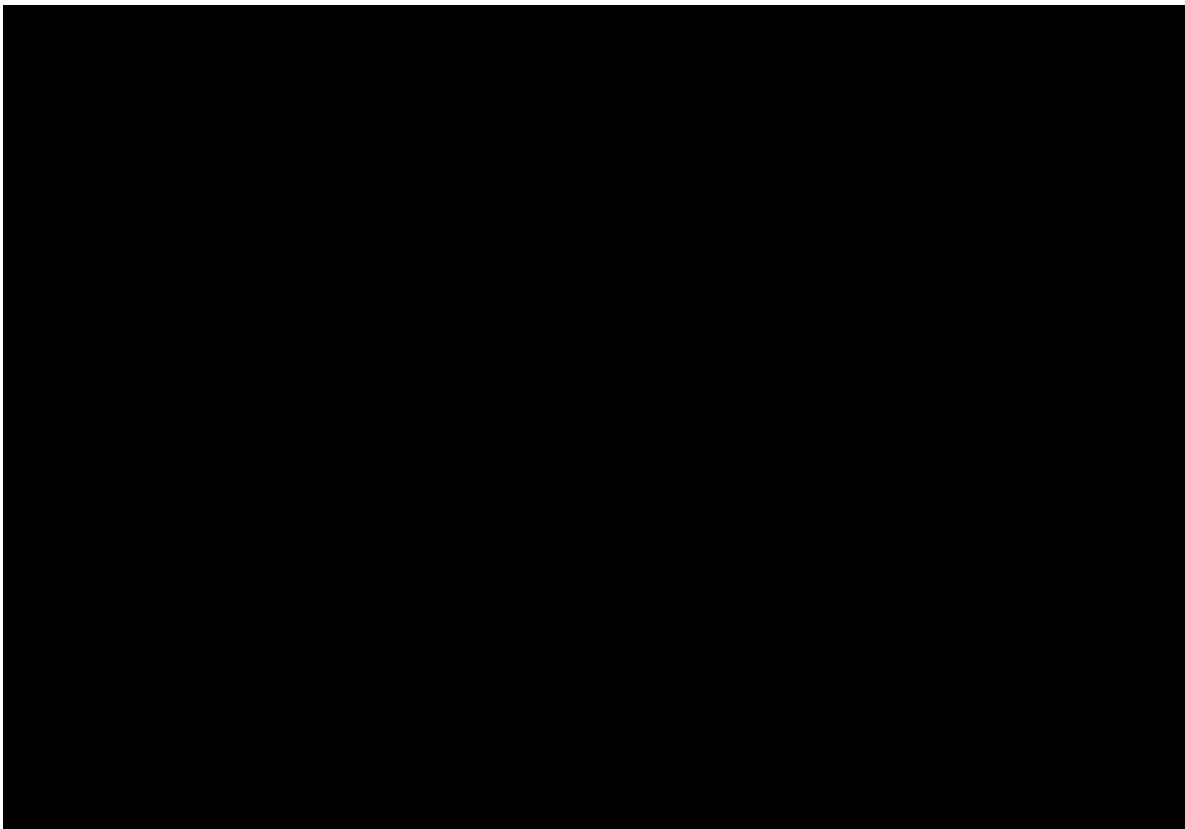
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Caesars' gross revenue for the jurisdictions where the Company has sports wagering operations for the last 12 months (July 2020 to June 2021). Also included are Caesars' total mobile accounts in jurisdictions where the Company has mobile sports wagering operations.

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State	Revenue	Mobile Accounts
NV	[REDACTED]	[REDACTED]
CO	[REDACTED]	[REDACTED]
IA	[REDACTED]	[REDACTED]
MI	[REDACTED]	[REDACTED]
IL	[REDACTED]	[REDACTED]
IN	[REDACTED]	[REDACTED]
PA	[REDACTED]	[REDACTED]
NY	[REDACTED]	[REDACTED]
MS	[REDACTED]	[REDACTED]
NM	[REDACTED]	[REDACTED]
VA	[REDACTED]	[REDACTED]
TN	[REDACTED]	[REDACTED]
NC	[REDACTED]	[REDACTED]
RI	[REDACTED]	[REDACTED]
NJ	[REDACTED]	[REDACTED]
DE	[REDACTED]	[REDACTED]
DC	[REDACTED]	[REDACTED]



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6.2 EXPERTISE

A. The Applicant shall provide a summary narrative, not to exceed two pages, highlighting the Applicant's expertise in mobile sports wagering and how the Applicant's expertise is applicable to this RFA. In addition to the summary, each Applicant shall provide:

Summary Narrative on Behalf of All Platform Provider Applicants

Our Platform Provider Applicants are experts in online and mobile sports wagering. Collectively, our Platforms have over 40 live deployments in regulated U.S. jurisdictions. Our Platforms are also proven globally with some of the world's largest online and mobile sports wagering operators.

Our Platform Provider submissions for Section 6.2.A covering the individual Applicants will provide key details on each Platform's technical and Operator support features, operation, support & maintenance capabilities, and differentiating characteristics. We are confident the Commission will conclude that our proposed set of Platforms are:

- Highly scalable, secure, and dependable
- Built to U.S. compliance standards
- Capable of supporting Operator differentiation

- Maintained and invested in by strong organizations

Highly Scalable, Secure, and Dependable

Nothing matters more to a regulated online sports wagering operation than the scalability, security, and dependability of its Platform. Platforms must be built to reliably handle significant traffic during major sporting events such as the Super Bowl. Sports wagering Operators heavily depend on this basic function to earn revenue and retain patrons. All this must be achieved while ensuring robust protection of sensitive patron information. In addition, our platforms are designed for day one market launches, quickly transferring players from the illegal market to the legalized one. All our Applicants have proven their ability to deploy quickly and operate to very high standards in live U.S. environments:

- Kambi's sports wagering platform is active in 6 continents. This global experience highlights the expertise of Kambi's operations, flexible to the consumer needs in any corner of the globe. Kambi has launched in 14 states and counting. Of those 14 states, Kambi was first to market in 10, taking either the first bet or launching on the first day of the market opening.
- Caesars' Liberty platform was specifically built to be scalable for the U.S. market. It is currently deployed in eight states, with several more expected before the end of 2021. Liberty utilizes modern, modular architecture that is API-driven, and designed to scale and adapt to the regulatory and reporting requirements of each state. It was developed to enable quick speed to market and large transaction volumes. The platform includes Caesars' pricing and trading operations, which are also fully owned.
- PointsBet is uniquely positioned as its sportsbook platform is a proprietary, managed technology across all elements, both front and back end. The platform employs a modern code base and is a proven technology in the US sports betting marketplace including across peak days in high volume transaction environments. The company's technology and development teams facilitate agile, custom, quick to market innovation, including all technical regulatory requirements.
- WynnBET's Platform technology, including licensed technology from Scientific Games, has supported the world's largest bookmakers during the world's largest betting events, including the Super Bowl and Cheltenham Festival. It is arguably the most tested betting Platform technology in the world. It has supported over 470 million account transactions and 60K bets per minute during a single major sporting event, all with 100% uptime.

Built to U.S. Compliance Standards

As noted above, our Platforms have collectively more than 40 live deployments in regulated U.S. jurisdictions. Our consortium has proven its ability to deliver to the demanding specifications of U.S. regulators. Our Platforms are all required to provide for robust patron verification procedures, geolocation requirements, responsible gaming standards, and high levels of security. All our Platforms have been rigorously tested to these requirements and approved by multiple independent testing labs, including the state-run testing lab in New Jersey.

Capable of Supporting Operator Differentiation

All our Platforms enable an Operator to perform the basic functions of a sports wagering operation reliably and with seamless execution, including: registering and verifying a patron, funding patron accounts, accounting for patron activity, presenting a wide selection of wagering opportunities, offering bonuses and promotions, processing wagers and managing risk, and reporting for business and regulatory needs. However, our Platforms go well beyond meeting basic Operator needs. Each of our Platforms is characterized by differentiating features that position an Operator to excel in growing its market share. Below is just a sample of what each Platform Provider uniquely offers:

- Kambi is 100% focused on being a Sports Wagering Platform supplier and is therefore unique in having a strong and vast network of operators in regulated markets across the world on its platform. The success Kambi delivers is anchored in its ability to leverage its network data from a global player base, creating increased network advantages as each new partner is added and existing

partners grow.

- Caesars' Liberty platform is integrated with Caesars Rewards, the largest gaming loyalty program in the country, allowing customers, win or lose, to earn Rewards Credits that be redeemed seamlessly for hotel stays, dining and other experiences at more than 50 properties across the country and for other curated experiences through Caesars' numerous sports and entertainment partners.
- PointsBet's Platform and operator experts excel in many areas but capabilities across the risk management, product innovation, content management and reporting functions are specifically notable. The competitive advantages over the long term provided by these unique Platform capabilities which support the Operators accordingly will generate compound returns to the state.
- WynnBET's platform supports innovative social interaction features and integrates Wynn Rewards, an omni-channel loyalty and bonusing program that will provide New York residents with unmatched access to Wynn's 5-star destination resorts.

Maintained and Invested in by Strong Organizations

The Commission is making a long-term decision for the State of New York and its residents. Given the potential for a 10-year license, our Platform Applicants are well positioned to apply their Platform expertise not just at the time of award but over the long haul. For such a commitment to matter, it needs to come from exceptionally strong organizations that are financially capable of investing R&D into improving and supporting their Platforms. Our Platform Applicants fit this profile:

- Kambi has been publicly traded on First North at Nasdaq Stockholm since 2014. Kambi generated over \$200 million in revenues over the past 12 months and has a strong liquidity position with over \$100 million of cash on balance sheet.
- Caesars, which acquired William Hill, is the nation's largest casino-entertainment operator maintaining approximately \$3.2 billion of cash and revolving borrowing capacity.
- PointsBet is publicly traded with \$501M of cash and no corporate debt which positions it to continue investing aggressively in its technology and product enhancement.
- WynnBET is majority owned and controlled by Wynn Resorts. Wynn Resorts maintains \$4 billion of liquidity globally with an additional ~\$640 million available to WynnBET upon closing its recently announced de-SPAC transaction.

We have a great deal of confidence in our Platform Applicants' expertise in online and mobile sports wagering. Our collection of proposed Platforms in aggregate is the most proven at scale in the world. We have extensive expertise in deploying our Platforms and supporting them in U.S. markets to meet the most demanding regulatory standards. We hope the Commission develops the same confidence in our collective abilities as we frame our independent Applicant profiles and responses in the remainder of Section 6.2.A.

An overview of the technical features and operation of the Mobile Sports Wagering Platform

Liberty Platform

Caesars has and continues to invest tens of millions of dollars in our technology and teams to build and deploy "Liberty," our proprietary technology platform for the U.S. market. Liberty launched in New Jersey in 2019, and is now also live in Colorado, Iowa, Indiana, Michigan, Tennessee, Virginia, and West Virginia. Liberty is a modern modular architecture that is API-driven, and designed to scale and adapt to the regulatory, reporting and partner requirements of each state. It was developed to enable quick speed to market and handle large transaction volumes. Our development is primarily done in house in our Jersey City, New Jersey and Las Vegas, Nevada offices and is supported by our international operations in the UK and Poland. Our platform is integrated with a variety of data feeds and live scoreboards from sports around the world.

Our pricing and trading operations (called the Global Trading Platform) are owned and operated by Caesars, including the proprietary algorithmic models that predominantly power most of our markets. Some of the sports data feeds used to feed the models, power lower tier sports, or settle certain markets are provided by well-known third-party providers, including Sportradar, Stats Perform, Genius Sports, and IMG. In addition, Don Best is used for importing each day's schedule of events and standard pre-match market consensus intelligence.

Caesars utilizes official data feeds from the major U.S. sports leagues, including from the MLB, NBA, NHL, and NFL.

Trading

Trading Overview:

Our expert team of traders supports our retail and digital operation on a global scale.

- 300+ traders and data scientists globally, anchored with a growing and experienced U.S. team in Las Vegas. 20+ client management analysts who identify betting patterns and behaviors.
- 12 product specialists to create unique betting opportunities.
- 64 technical delivery staff live coding all models.

Trading Platform:

Caesars' sports betting operation is supported by our Global Trading Platform (GTP), a comprehensive and proprietary suite of trading applications that support event creation, pricing, and resulting across a broad range of sports globally. The GTP supports the U.S. Trading team for the live betting markets and enables Caesars' U.S. sports betting partners to benefit from the scale and quality of Caesars' bookmaking operation. It offers wagering on a 24/7 basis on events from around the world with considerable depth of markets and pricing sophistication. There is always an event to bet on. Caesars trades more than 200,000 events with live betting every year.

Risk Management

Caesars focuses with detail on risk and player management through proprietary data, reporting, and analytics. Our tools help us identify customers who consistently beat the closing line or only wager when they have an advantage. This team also tracks bonus abuse and other fraud, and on the other end of the customer spectrum, helps identify and score VIPs and support player development. As margins are built on multiple tiers of customers, this attention to customer-level data helps improve results and lifetime value significantly. New York will see the benefits of Caesars' risk management and player development expertise.

Player Account Management (PAM)

Caesars is a material minority owner of NeoGames whose teams develop our PAM under Caesars' direction. The Caesars PAM is licensed in all states that use Liberty. The PAM has multiple capabilities which enables customer registration, deposits and withdrawals (ACH, online banking, PayPal, credit card, PayNearMe, Skrill, Play+, and deposit at retail locations). Caesars uses industry leaders LexisNexis for Know Your Customers services ("KYC") and GeoComply for location verification.

Technology Benefits

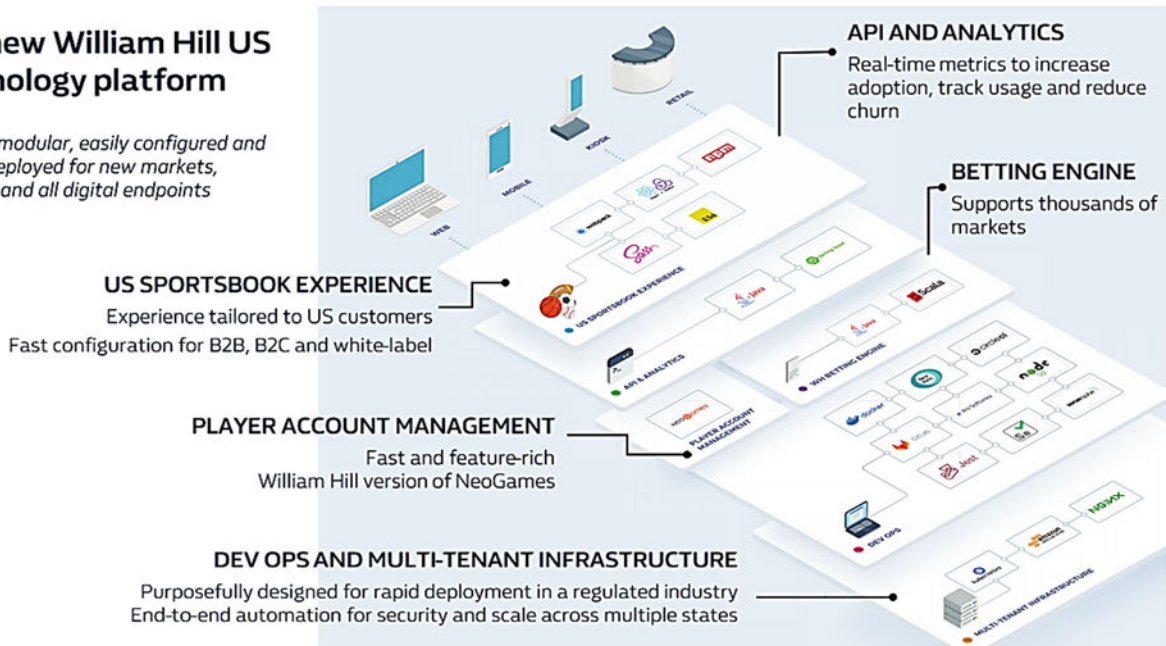
- Increase registration success rate
- Decrease KYC and deposit failures
- Decrease registration time and time to bet
- Dead simple navigation

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- Ability to launch quickly and handle increasing scale
- Strong deployment architecture, leveraging cloud and on-prem structure

The new William Hill US technology platform

Modern, modular, easily configured and rapidly deployed for new markets, partners and all digital endpoints



Types of Payment Solutions

Caesars' mobile wagering solution supports all popular payment methods. Payment options include:

- Credit/debit cards (Visa, Mastercard, and Discover)
- E-check
- Online banking (powered by PayWithMyBank)
- Caesars Prepaid Play + Card (from Sightline Payments)
- Skrill
- PayNearMe
- PayPal
- Cash deposited at kiosks and retail locations

Caesars will also provide terminals at Turning Stone Resort and Casino, Yellow Brick Road Casino and Point Place Casino (all owned by the Oneida Indian Nation) for customers looking to collect on winning bets. As the leading retail operator in the U.S., Caesars has simplified ways to receive funds for customers who prefer to collect cash.

Compliance

Caesars will take an active role in continuing to improve regulations and internal controls alongside the Commission. Our extensive experience, history of operating excellence, best-in-class technology, extensive marketing partnerships, and recognizable brands will all work in support of an unrivaled experience for New York residents and visitors. We understand our operations are at the privilege of our license, and we strive to ensure that compliance is a pillar of our operating culture.

Our Anti-Money Laundering ("AML") program establishes the policies and procedures by which we will comply with applicable provisions of the Bank Secrecy Act ("BSA"), including AML and the Office of Foreign

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Assets Control ("OFAC") program. Our robust AML program also satisfies required FinCEN reporting, including forms 111, 112, and 8300. The full AML program is made available to all partners.

The sports betting platform allows the Compliance team to utilize multiple detection techniques to monitor customer and account behavior for suspicious activity. Areas of coverage include but are not limited to:

- Currency Transaction Reporting
- Know Your Customer
- Suspicious Activity Reporting
- Patron Information Authentication, including verification of Taxpayer Identification Number ("TIN")
- Duplicate Account Management

We have also established, and abide by, regulatory and financial internal controls that ensure all filings in both domestic and international jurisdictions are met. Caesars does not foresee any issues in acquiring a license to operate in the state of New York.

An overview of how the Applicant will provide continual support and maintenance of the Mobile Sports Wagering Platform

Customer Support

Caesars' Customer Support team is comprised of more than 70 agents and supervisors, handling voice, email, text, and chat contacts. The Customer Support team uses bespoke back office and Oracle RightNow to support customer deposits. Customer Support also works closely with the Software Support team, which is available to resolve technical issues, perform root cause analysis, and provide solutions for recurring problems.

The Customer Support department has a 24/7/365 model to support time zones across the U.S. Customer contact quality and issue resolution is the highest priority, and supervisory team members meet with all agents twice monthly to review calls, provide feedback, and ensure that customer contact agents have the knowledge and confidence to provide superior customer service with every request.

Integrity Monitoring Services

Caesars team members work to identify and know the customers who are placing wagers to verify that all funds used are sourced legally. Caesars believes all applicable employees are responsible for monitoring and recording cash transactions, obtaining identifying information before completing transactions and to report suspicious activity.

On the global platform, Caesars has a full suite of fraud and security tools, both built into the account platform and outside of the platform provided by third-party suppliers. Within the account function, we have a Unique Reference Number ("URN") matching tool which cross-references customers against the date of birth, first name, last name, and zip code to control duplicate sign-ups. Caesars has 10+ fraud flags controlling how we deal with customers based on known information (e.g., chargeback flag activated if customer has a history of chargebacks) as well as controlling customers eligibility to receive bonuses (split by sports and gaming, with the two linked if appropriate) and how we control the liability to certain sports customers based on a maximum stake factor ("MSF"). This effectively automates how much we lay to customers as a value (e.g., 0.1) multiplied by pre-programmed standard market size (for each event we lay bets on).

Caesars uses Iovation and Featurespace as primary fraud prevention tools. Together, we have more than 250 fraud rules that operate in real-time or on review/delay and appropriately manage and restrict what actions customers can effect (e.g., deposit/withdraw). Iovation limits activity (sign-ups, bet placement) from multiple accounts across the same device. We also have business intelligence reporting to control similar patterns based on IP. Featurespace is a machine learning fraud tool that proactively flags risky transactions

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and accounts based on patterns of behavior. This tool allows the operator to create standard rules controlling customer behavior at every critical step (e.g., alert when the customer next deposits, or limit deposit/withdrawal to a certain level in a month based on a specific payment method).

An outline of the features of the Mobile Sports Wagering Platform designed to support the Operators

Components of the Liberty Platform

- Betting Engine for market and transaction management.
- Player Account Management (PAM): acquired from NeoGames; Caesars controls the development of the acquired branch.
- Mobile Tech: UX/UI and sports betting and online casino front-end.
- Marketing and CRM Technology: data and customer experience platform integrated with Marketo and other leading marketing solutions to maximize customer value.
- Fraud Management: detection software integrated with available payment methods.
- Geolocation: GeoComply solution integration.
- Retail: supports point-of-sale terminals.
- Kiosk: Scientific Games provides the terminals on which Caesars deploys proprietary front-end software which is now also powered by our Liberty platform.
- Global Trading Platform: pricing and odds feeds from around the world.
- Odds Display Boards: for retail sportsbooks.

The screenshot displays the Caesars Sportsbook interface. At the top, there are navigation links for 'Sportsbook' and 'Casino', along with 'Log in' and 'Sign up'. Below the navigation, there is a search bar and a 'Promotions' section. The main content area is divided into three sections, each representing a different game:

- BALTIMORE ORIOLES AT NEW YORK YANKEES >** (AUG 31 4:05PM)

MONEY LINE	RUN LINE	TOTAL RUNS
+199	+1.5 +105	Over 10.5 -110
-219	-1.5 -125	Under 10.5 -110
- PHILADELPHIA PHILLIES AT WASHINGTON NATIONALS >** (AUG 31 4:05PM)

MONEY LINE	RUN LINE	TOTAL RUNS
-177	-1.5 -110	Over 8.0 -115
+162	+1.5 -110	Under 8.0 -105
- CLEVELAND INDIANS AT TORONTO BLUE JAYS >** (AUG 31 4:07PM)

MONEY LINE	RUN LINE	TOTAL RUNS
+183	+1.5 -110	Over 8.5 -120
-203	-1.5 -110	Under 8.5 +100

On the right side of the interface, there is a 'Betslip' section with a '1' icon, 'Open Bets', and 'Clear all' options. Below this, there is a 'Straight Bet' section showing a bet on 'New York Yankees' with a money line of -219 and a total of \$0.00.

An outline of any technology to be used or features offered that the Applicant believes sets the Applicant apart from other potential Applicants

Caesars owns and controls its own proprietary Liberty sports betting technology platform, which fuels innovative and differentiated products to engage Caesars' customers. The following features enable Caesars to stand out from the competition:

Caesars Rewards:

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- Caesars Rewards allows customers to earn tier status and online reward credits for every bet
- Tier credits and online reward credits are integrated into the bonus engine to deliver more value to our customers and greater flexibility to create more engagement and loyalty
- Similar to airline and hotel rewards, Caesars will also be able to use Rewards in unique ways for curated experience with an array of partners, which allows customers more options

Profit Boosts:

- Caesars can provide “Profit Boosts” for use on any type of bet or tailored to specific markets, sports or events
- The platform gives customers the flexibility to choose when to use that boost
- Profits boosts reward customers and incentivizes them to win more on new types of markets and bet types

Live Betting:

- Our live betting product is driven by algorithms developed and refined in-house, making it completely proprietary.
- Our odds feed utilizes official data with minimal latency for many sports.

Bonus Engine Inputs:

- Automation of bonuses based on many inputs
- Built to listen to both internal and external triggers (e.g., live stats, social interactions, retail activity, or hotel booking could trigger an online bonus)

Segmentation:

- A single source of truth for all segments will be used to power not only marketing communication, but also the betting markets, promotions, and sportsbook content
- Passive segmentation will give customers a better experience without any effort on their part

Additional information the Applicant believes relevant to demonstrate the Applicant’s expertise

We consider reliability and availability of our mobile betting operation as a key differentiator for us in the marketplace. Recent history bears this out as the sole provider of continuous mobile betting services during the 2020 Super Bowl LIV.

B. The Applicant shall provide a summary narrative, not to exceed two pages per proposed Operator, highlighting the expertise in sports wagering that such proposed Operator demonstrates. In addition to the summary, each Applicant shall provide:

Caesars, through its wholly owned subsidiary, William Hill, has unmatched expertise in sports wagering, both in the U.S. and throughout the world. Sports betting is in the DNA of William Hill, an 87-year-old company, which Caesars acquired in April 2021.

Operations

Caesars operates sports betting in 17 states and Washington D.C., with over 170 brick-and-mortar sportsbooks, and online operations in 13 states. Caesars has developed and executed dozens of partnerships through state lotteries, commercial casinos, tribal casinos, and racetrack partners. Caesars is the exclusive sports betting risk manager and odds provider to the Delaware Lottery and the Rhode Island Lottery.

Caesars controls nearly all aspects of the sports wagering experience, employing over 1,200 people in Caesar Digital, its newly formed sports betting and online gaming division formed following the acquisition of William Hill. Caesars also draws on resources from its 55,000 employees nationwide. The Company brings substantial talent and ownership of sports betting operations, marketing, and technology with a focus on strong products, customer service, compliance, financial reporting, and responsible gaming.

Technology and Trading

Caesars owns and controls its own proprietary sports betting technology platform, including trading and risk management, which fuels innovative and differentiated products and higher returns resulting in higher revenue shares to partners. We have a dedicated team of traders and client management analysts and a dedicated data science team at the ready to focus on New York. Caesars consistently delivers the ultimate menu of betting options for our customers.

Caesars' sports betting operation is supported by our Global Trading Platform (GTP), a comprehensive and proprietary suite of trading applications that support event creation, pricing, and resulting across a broad range of sports globally. Caesars trades more than 200,000 events with live betting every year. Caesars focuses with detail on risk and player management through proprietary data, reporting, and analytics. Our tools help us identify customers who consistently beat the closing line or only wager when they have an advantage. This team also tracks bonus abuse and other fraud, and on the other end of the customer spectrum, helps identify and score VIPs and support player development. Caesars' Player Account Management (PAM) has multiple capabilities which enables customer registration, deposits, and withdrawals. Caesars also uses industry leaders LexisNexis for Know Your Customers services ("KYC") and GeoComply for location verification.

Marketing

Following the recent rebrand and relaunch of Caesars Sportsbook, Caesars is investing significantly in advertising and marketing.

We use media to reinforce the quality of the Caesars experience and brand, our commitment to responsible gaming, as well as to provide unique offers to sports fans and bettors. We will leverage years of experience to successfully launch in New York, acquire new sports betting customers, shift current sports bettors from unlicensed competitors, and sustain engagement. Our marketing channels for New York include:

- TV/Radio/Billboards to create awareness and education.
- Direct response media using e-mail, direct mail, affiliate programs, the Caesars database, social media, and search.
- Grassroots partnerships with various local bars, venues and local events throughout New York to provide a local touch to drive consumer engagement.
- Media and league partnerships
- Event activations at Turning Stone Resort and Casino, Yellow Brick Road Casino and Point Place Casino, all owned by the Oneida Indian Nation

Caesars will utilize its league and national media partnerships in New York to drive customer acquisition at scale. These partnerships include:

- CBS Sports: Caesars is the exclusive sportsbook partner and wagering data provider across all CBS Sports platforms
- ESPN: Caesars has a co-exclusive partnership with ESPN. Link integrations to Caesars' sports betting apps, geo-targeted to legalized sports betting states, will appear on ESPN.com web and mobile web and the ESPN Fantasy app.
- NFL: As an official sports betting partner of NFL, Caesars benefits from a variety of NFL intellectual property and asset rights, including the right to use league marks and logos in advertising and

promotions.

- MLB: As an “Authorized Gaming Operator” of MLB, Caesars has the right to use MLB league and club marks and logos on our mobile platform and in retail sportsbooks.
- NBA: As an official partner of the NBA, Caesars receives media assets across NBA digital channels, and gives Caesars the right to use official NBA betting data and league marks across our mobile platforms and in-person sportsbooks.
- NHL: As an official sports betting partner, Caesars can advertise on the NHL’s website and other digital platforms, as well as use official logos and official league data.

Caesars stands alone in the sports betting landscape with Caesars Rewards. It is the gaming industry’s largest and oldest loyalty program and is widely regarded as the best in class by our customers as well as industry and loyalty publications like Loyalty 360, USA Today, and the Freddie Awards. There is no other operator in the world that can match the depth and reach of the Caesars Rewards program. With Caesars Rewards, bettors access an empire; an empire where they are always a VIP and can be rewarded with free bets, special bonuses, tickets to sports games, or hotel stays on us. Caesars has a database of over 60 million customers in the U.S. and over **CONFIDENTIAL INFORMATION BEGINS HERE** [REDACTED] **CONFIDENTIAL INFORMATION ENDS HERE** customers in New York alone.

An overview of the integration between the Applicant’s Platform and the Operator’s wagering system

Caesars owns and controls its proprietary sports betting platform, Liberty, which is currently deployed in eight states. Built specifically for the U.S. market, Liberty is a modern, scalable platform which fuels innovative and differentiated products.

Caesars is the only operator on the Liberty platform, as it was designed and built for Caesars’ own business-to-consumer use.

An outline of the features offered or used by the Operator that the Applicant believes sets it apart from other potential Applicants

Caesars owns and controls its own proprietary Liberty sports betting technology platform, which fuels innovative and differentiated products to engage Caesars’ customers. The following features enable Caesars to stand out from the competition:

Caesars Rewards:

- Caesars Rewards allows customers to earn tier status and online reward credits for every bet
- Tier credits and online reward credits are integrated into the bonus engine to deliver more value to our customers and greater flexibility to create more engagement and loyalty
- Similar to airline and hotel rewards, Caesars will also be able to use Rewards in unique ways for curated experience with an array of partners, which allows customers more options

Profit Boosts:

- Caesars can provide “Profit Boosts” for use on any type of bet or tailored to specific markets, sports or events
- The platform gives customers the flexibility to choose when to use that boost
- Profits boosts reward customers and incentivizes them to win more on new types of markets and bet types

Live Betting:

- Our live betting product is driven by algorithms developed and refined in-house, making it

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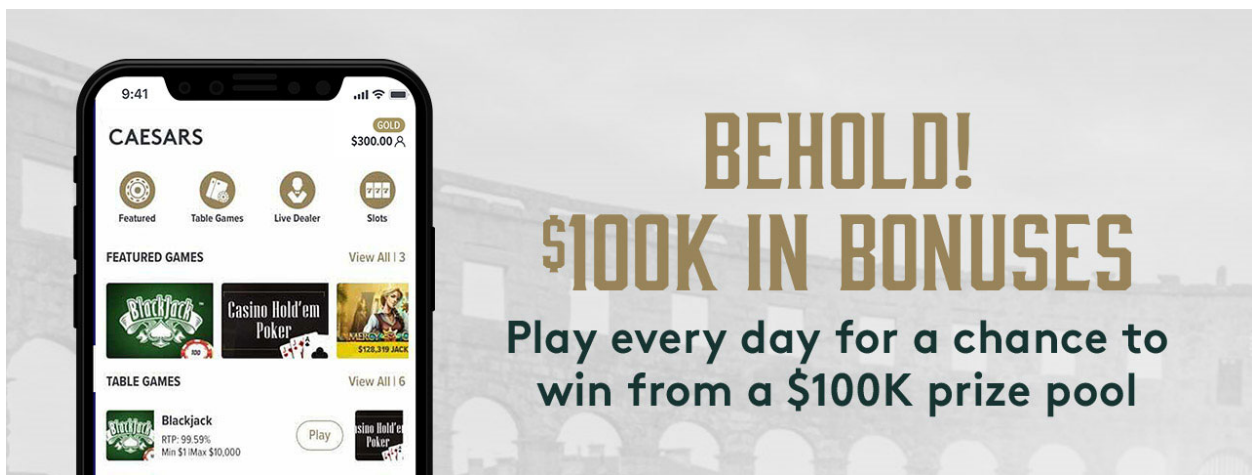
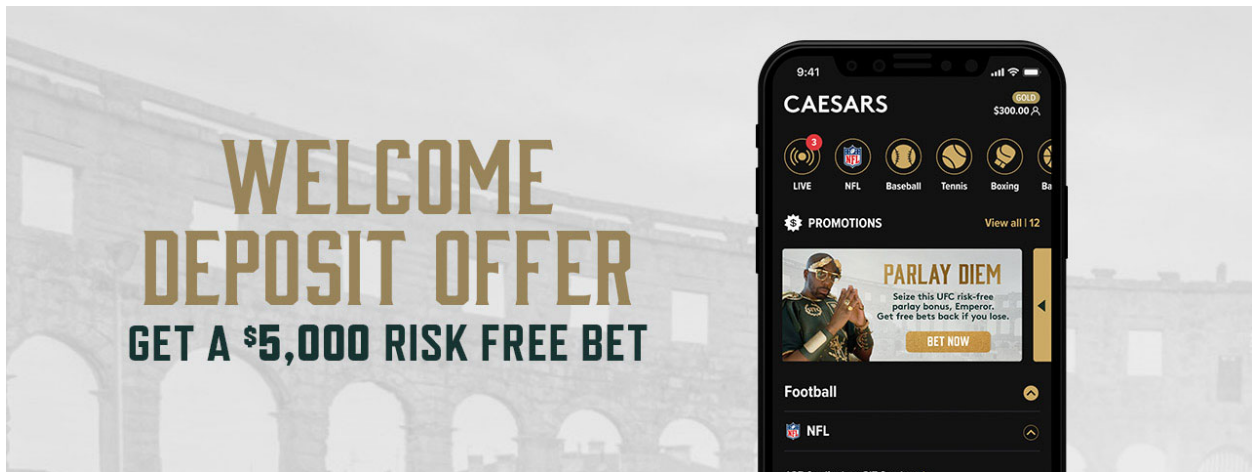
- completely proprietary.
- Our odds feed utilizes official data with minimal latency for many sports.

Bonus Engine Inputs:

- Automation of bonuses based on many inputs
- Built to listen to both internal and external triggers (e.g., live stats, social interactions, retail activity, or hotel booking could trigger an online bonus)

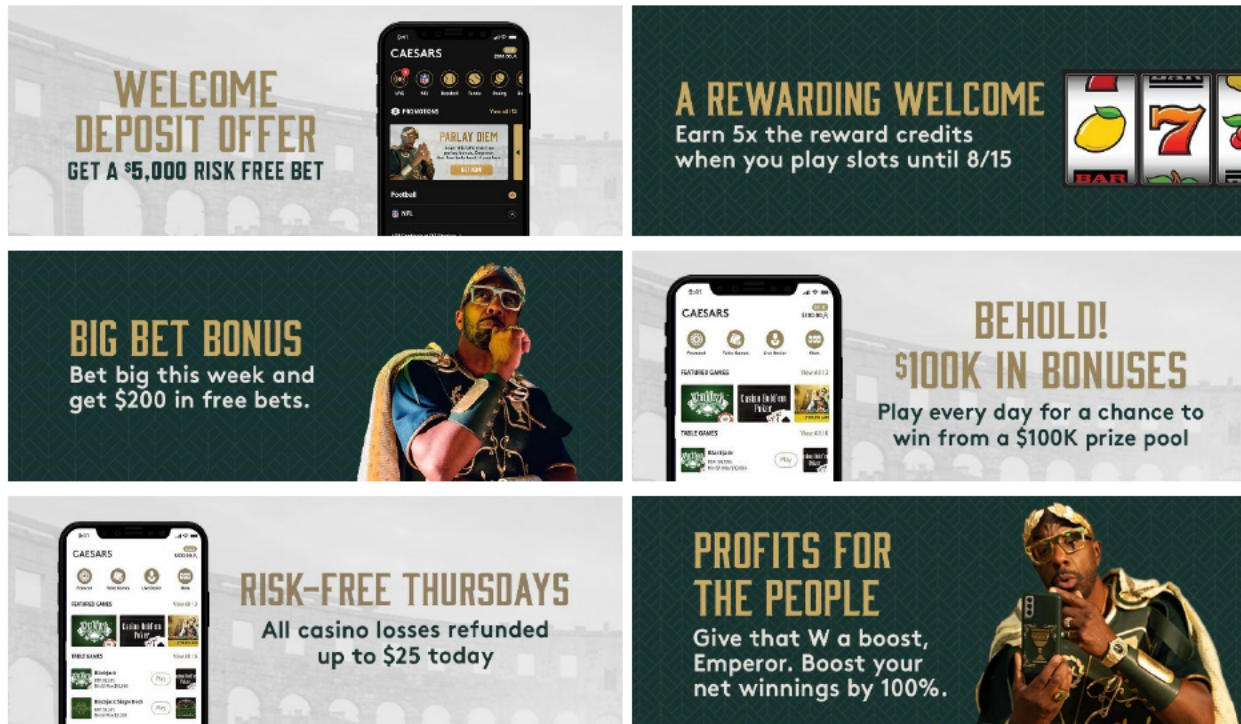
Segmentation:

- A single source of truth for all segments will be used to power not only marketing communication, but also the betting markets, promotions, and sportsbook content
- Passive segmentation will give customers a better experience without any effort on their part



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Promotions Unique to Caesars Sportsbook:



A sample wagering menu the Operator intends to offer if such wagers are approved by the Commission

Below is a sample menu of our current futures (varies by state by to comply with local regulations) and other wagering options. Note, some wagering options are only available in select states.

Sport	Futures & Wagering Options
Football	<ul style="list-style-type: none"> • 2021–2022 Pro Football Championship 56 Futures • 2021–2022 Pro Football Conference (AFC & NFC) Futures • 2021–2022 Pro Football Championship 56 AFC vs NFC prop • 2021–2022 Pro Football Division Futures • 2021 Pro Football win totals • 2021 Pro Football Week 1 games • 2021 Pro Football AP MVP Award Futures • 2021–2022 Pro Football Offensive Rookie of the Year Futures • 2021–2022 Pro Football Defensive Rookie of the Year Futures • 2021–2022 Pro Football Coach of Year Award Futures • 2021–2022 Pro Football Regular Season Leader Futures (Passing Yards Leader, Rushing Yards Leader, Receiving Yards Leader) • 2021–2022 Pro Football Regular Season Player props • Preseason Pro Football Week 1 • 2021–2022 College Football Futures to win National Championship • 2021–2022 College Football Heisman Trophy Futures • 2021–2022 College Football Conference Championship Futures • Select College Football Week 1 Games • 2021 Grey Cup Futures

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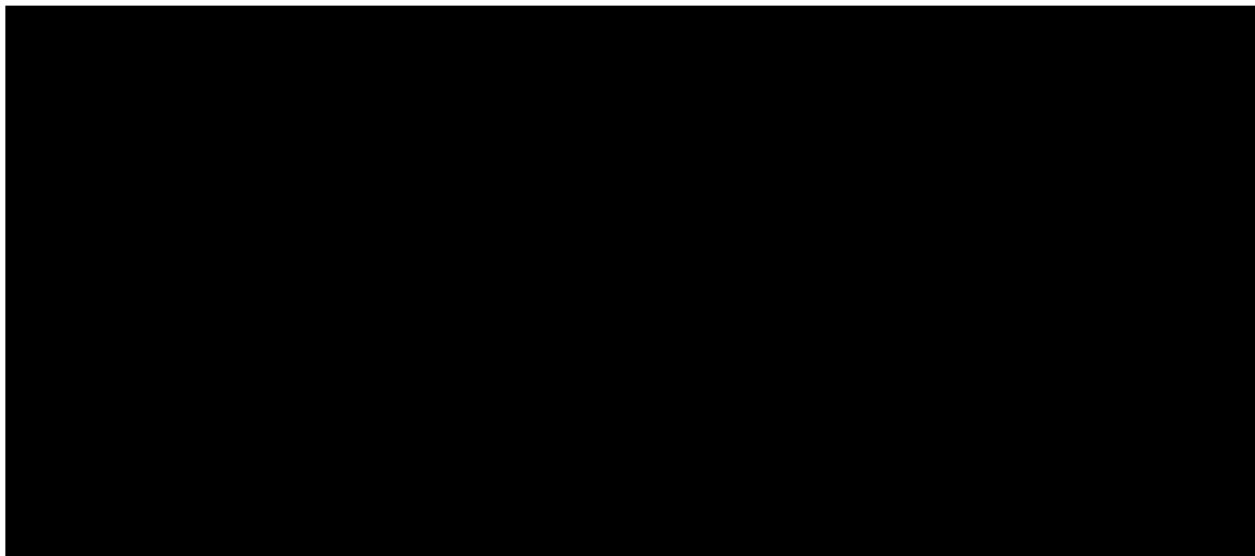
Sport	Futures & Wagering Options
Basketball	<ul style="list-style-type: none"> • 2020–21 Men's Pro Basketball playoff games • 2020–21 Men's Pro Basketball playoff select game props • 2020–21 Men's Pro Basketball Playoff Best of Seven series matchup futures • 2021 Women's Pro Basketball futures to win 2021 Championships • 2021 Women's Pro Basketball games • 2022 Men's College Basketball futures to win National Championship • 2020–21 Men's Euroleague Futures to win Championship • German BBL Basketball • Spain ACB Basketball • Israel Super League Basketball • Euroleague Basketball matches • 2021 Big3 Championship Futures
Baseball	<ul style="list-style-type: none"> • 2021 Pro Baseball Championship Futures • 2021 Pro Baseball Regular Season games • 2021 Pro Baseball AL and NL Pennant Futures • 2021 Pro Baseball Division Futures • 2021 Pro Baseball AL & NL MVP Award Futures • 2021 AL & NL CY Young Award Futures • 2021 Pro Baseball Regular Season Hits, RBI, HR, and K's Futures • 2021 Minor League Baseball • 2021 Women's College Softball Game 3 & 4 • 2021 Japan Professional Baseball games (Non–U.S. Baseball)
Hockey	<ul style="list-style-type: none"> • 2021–2022 Pro Hockey Futures to win Pro Hockey Championship (Championship Money Line) • 2021 International Hockey matches • 2021–2022 Regular Season Points Seattle • 2021–2022 Select Regular Season game lines
Soccer	<ul style="list-style-type: none"> • German Bundesliga • K League • Denmark Superliga matches • Belgium Pro League matches • Portugal Primeira Liga matches • Spanish Primera matches • Russian Premier League matches • Coppa Italy matches • Copa America matches • Turkish League matches • English Premier League matches • Liga Soccer matches • World Cup Qualifying matches • 2021 MLS Cup Soccer futures • 2022 FIFA World Cup Futures • 2020–21 UEFA Europa League Futures • 2020–21 UEFA Champions League Futures • 2020–21 English Premier League Futures • 2021 Liga Mx Clausura Futures • 2021 COPA America Futures • 2021 USL Championship Futures
Golf	<ul style="list-style-type: none"> • 43rd Ryder Cup – 3 Way Result

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Sport	Futures & Wagering Options
	<ul style="list-style-type: none"> • 43rd Ryder Cup to Lift Trophy – Europe vs USA • 2020–21 Fed Ex Cup Futures • 2021 Solheim Cup – 3 Way Result • 2021 Solheim Cup to Lift Trophy – Europe vs USA • 2022 Masters Futures • 2021 PGA Tour Event Futures • Matchups and props for select tournaments
Boxing/MMA	<ul style="list-style-type: none"> • UFC in Las Vegas on July 31, 2021 • Dickens vs Galahad on August 7, 2021 • UFC 265 on August 7, 2021 • Joshua vs Usyk on August 21, 2021 • Spence Jr vs Pacquiao on August 21, 2021 • Wilder vs Fury on October 9, 2021 • Professional Fighters League 2021 Matches
Australian Rules Football	<ul style="list-style-type: none"> • 2021 AFL Grand Final Futures and select matchups
Chess	<ul style="list-style-type: none"> • 2021 World Chess Championship Futures


An illustration of the proposed Operator’s ability to rapidly effectuate the commencement of mobile sports wagering on the Applicant’s Platform

Caesars owns its proprietary mobile sports betting technology, including front and back end. Caesars has already invested in the hardware and infrastructure required to support the anticipated level of customer accounts and wagering volumes in New York. We have and continue to perform hardware and software configuration and testing based on the draft regulations and will finalize our New York State build when regulations are final. This will allow a go live date of about six to eight weeks post receipt of the finalized New York sports betting regulations and subject to the designated casino datacenter being built to our specifications. Most recently, Caesars launched day 1 in the Michigan mobile sports betting market. Michigan is the largest sports betting market to go live in 2021.



Additional information the Applicant believes relevant to demonstrate the Operator's expertise, including, without limitation, experience in the field of mobile sports wagering

Caesars is uniquely qualified to maximize sports betting revenue opportunities for the State of New York:


- Caesars expects to have market access to nearly **CONFIDENTIAL INFORMATION BEGINS HERE**  **CONFIDENTIAL INFORMATION ENDS HERE** of the US population, creating a nationwide network that will benefit New York with residents and visitors having the app on their phones to place sports wagers while in New York.
- Caesars Entertainment has positive adjusted EBITDA. This is driven by an effective marketing engine which delivers profitability that can be used for sustainability and growth.
- Caesars utilizes its mobile platforms to drive visitation back to its casinos or partner casinos. Caesars will market Turning Stone Resort and Casino, which will ultimately drive visitation and spend on property for VIP events, game days and major sporting events. This will increase overall benefit New York receives from Turning Stone Resort and Casino.
- Caesars expertise and experience in building new businesses including the World Series of Poker (WSOP) (15 seasons on air), Playtika (Social Gaming platform that Caesars sold for \$4.4 billion) and being one of the first operators to launch Real Money Online Gaming (Casino and Poker) in New Jersey in 2013.
- Caesars expertise in recruitment and training brings a world class management team to support our success in New York.
- Caesars subsidiary, William Hill UK, has more than 87 years of experience, including nine years in the U.S.
- Caesars operates sports betting in 18 jurisdictions, with more than 170 brick-and-mortar sportsbooks and online operations in 13 states.

6.3 INTEGRITY, SUSTAINABILITY AND SAFETY

The Applicant shall provide detailed information on how the Applicant or the Applicant's proposed Operators will ensure the responsibilities, duties and requirements in draft regulations Part 5330 in regard to:

A. Wager acceptance

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[REDACTED]

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B. Verification of information provided by Authorized Sports Bettors opening a new account

Liberty's player account management (PAM) module is built and maintained for Caesars by NeoGames S.A. The solution provides numerous functionalities, including but not limited to the following: player registration and login, identity verification, deposits and withdrawals, transaction history, and geolocation services.

Caesars processes know-your-customer (KYC) verifications via NeoGames and LexisNexis for real-time and on-demand identity verification. Through the use of LexisNexis's FlexID and ThreatMatrix solutions, Caesars is able to quickly verify a patron's eligibility for wagering.

For all states where Caesars operates the Liberty System, patrons are subject to the age and identify verification. The patron's age is then verified through multiple sources of identification such as government issued ID and utility bills / bank statements. If the player's age and identify cannot be validated through the KYC process, the account will remain restricted until additional documentation pass the third-party check.

LexisNexis KYC requires the following user information: first and last name, date of birth, Social Security Number (full or last 4 digits) and residential address.

Verification success is achieved only when a player meets the all the following conditions:

- Full name match at the supplied address, where the address is residential
- A valid SSN
- The player meets the minimum age requirement (verification that the customer is of legal age or older (to the day of verification)
- Phone and device verification

C. The systems used for monitoring structured wagers and unusual or suspicious wagering activity

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Using the Neo platform, Caesars successfully restricts identity fraud with LexisNexis identity software, combined with Neo's matching rules to detect false identities from establishing accounts. The NeoSphere provides configurable limits to control value and velocity of deposit and withdrawal transactions to control each payment type activity based on risk assessment. Caesars utilizes additional rules-based triggers for the prevention of other known risks, such as card testing. Other rules flag new payment types for additional scrutiny or a larger first deposit. Withdrawals are reviewed by a team of trained analysts, prompted by alerts to evaluate relevant criteria. Analysts may also flag a player to monitor for suspicious activity that does not arise to account closure, but merits follow up.

Event wagering systems regulated in the U.S. are typically required to formally identify a set of "critical components" (also known as "regulated components") that require a higher degree of change governance and live monitoring.

For instance, to comply with GLI-20 and GLI-33, West Virginia requires:

- A daily report showing the signature of each instance of a critical component, as a means of determining that all running instances are using the approved versions
- A process to detect and shutdown a critical component that has changed without the correct change management authorization

The specific requirements are described by GLI-33 2.3.2, 2.3.4, 3.2.3, and GLI-20 3.2.2.

It is expected that other jurisdictions will adopt these or similar requirements.

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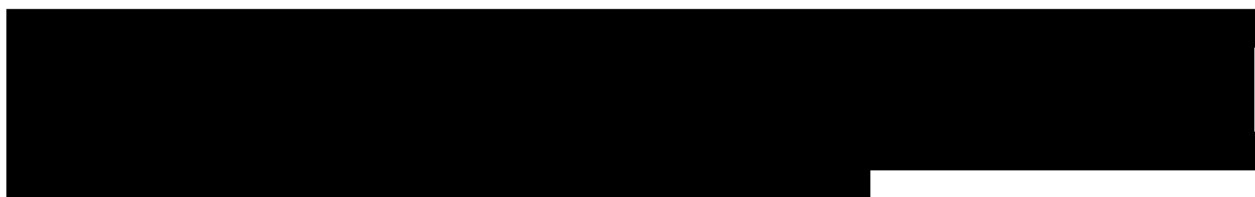
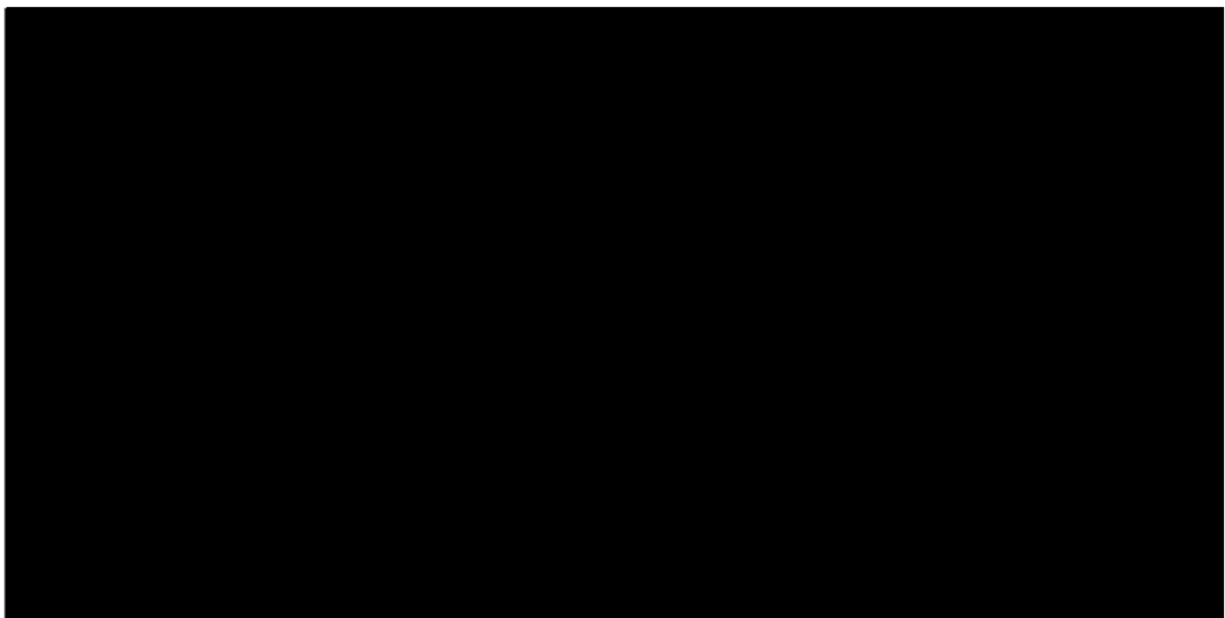
[REDACTED]

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D. The systems used to ensure that Authorized Sports Bettors are physically located within the State of New York while placing a wager

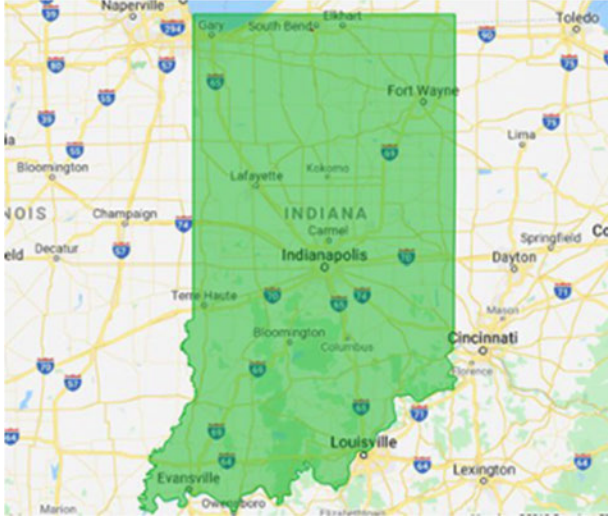
GeoComply is the location provider for the Liberty System. This third party is responsible for validating the bettors' eligibility, given accounts used to place bets are within the borders of the State of New York at the time of each wager.

The geolocation solution includes verification during user login, bet placement, and, at a minimum, 30 minutes since the previous location check, to ensure wagers cannot be made outside the jurisdictional boundaries. GeoComply utilizes Wi-Fi, GPS, or GSM signals to locate the user. Geolocation features are supported on both website, Android, and iOS devices. In the event of a patron's geolocation setting being out-of-bounds or otherwise un-verifiable, an appropriate warning message is displayed. Warning messages displayed to the patron are made to be easily interpreted to allow end-users to resolve issues in real-time.

The proposed system would be subject to a battery of tests that include field testing at the borders of New York, along with verification that players cannot use jail-broken devices, VPN, RDP, or other IP spoofing techniques. External testing of the system may be performed by third-party testing services, as well as by the Commission.

Example: State & Tribal Geolocation Boundary Zones

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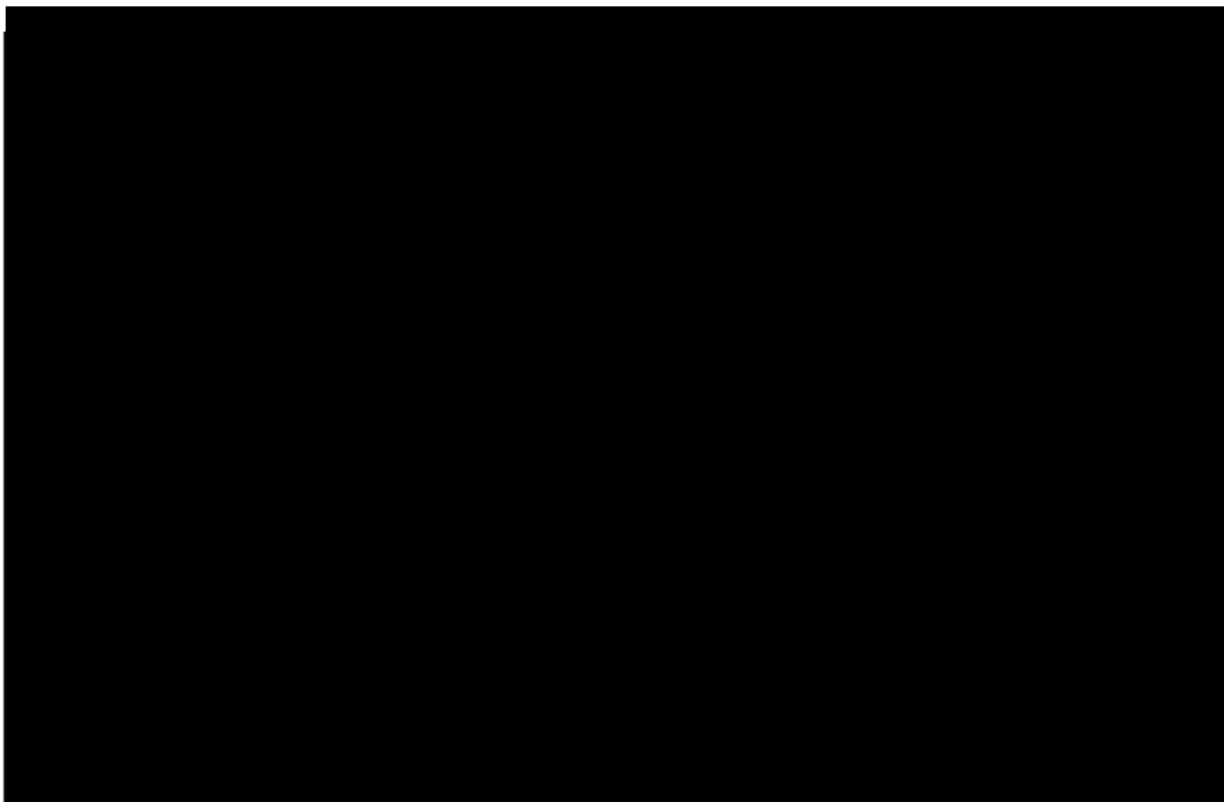
E. The technology to ensure that any wager is accepted through equipment physically located at a licensed gaming facility in the State

Master Diagram and Overview:

- See *Exhibit A – Master Architecture Diagram* [CONFIDENTIAL]
- See *Exhibit B – Liberty Architectural Overview* [CONFIDENTIAL]
- See *Exhibit C – Hardware Stack* [CONFIDENTIAL]
- See *Exhibit D – Typical-In-State Deployment View* [CONFIDENTIAL]

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The retail version of our solution, Liberty Retail, employs a combination of on-premise and cloud-based services to comply with regulations requiring core betting functions and data to be physically located within in-state data centers, while leveraging the scalability and resilience of cloud-based services for non-core processes and secondary storage.

The typical state deployment model consists of physical hardware (kiosks, POS, administration PC, odds display walls) located in retail sportsbooks, accessing centralized data center services via Amazon Web Services.

Key elements of the Liberty Retail platform are shared with our mobile platform, Liberty Mobile, to provide a consistent service across all channels. These include Caesars’:

- Betting Engine
- Global Trading Platform (for odds, trading and risk management)
- Smart Data Platform (reporting)
- Sportsbook API
- Monitoring & Alerting

Front End Architecture and Services

Liberty Retail front end services deliver the user interface (“UI”) utilized by kiosk patrons, ticket writers (tellers), and sportsbook managers or supervisors, as shown in the diagram.

See *Exhibit E – Front End Overview* **[CONFIDENTIAL]**

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See Exhibit F – Back End Overview [CONFIDENTIAL]

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F. Description and location of redundant servers, if any

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G. Security of servers, applications, and communication networks; and patron personal and wagering information

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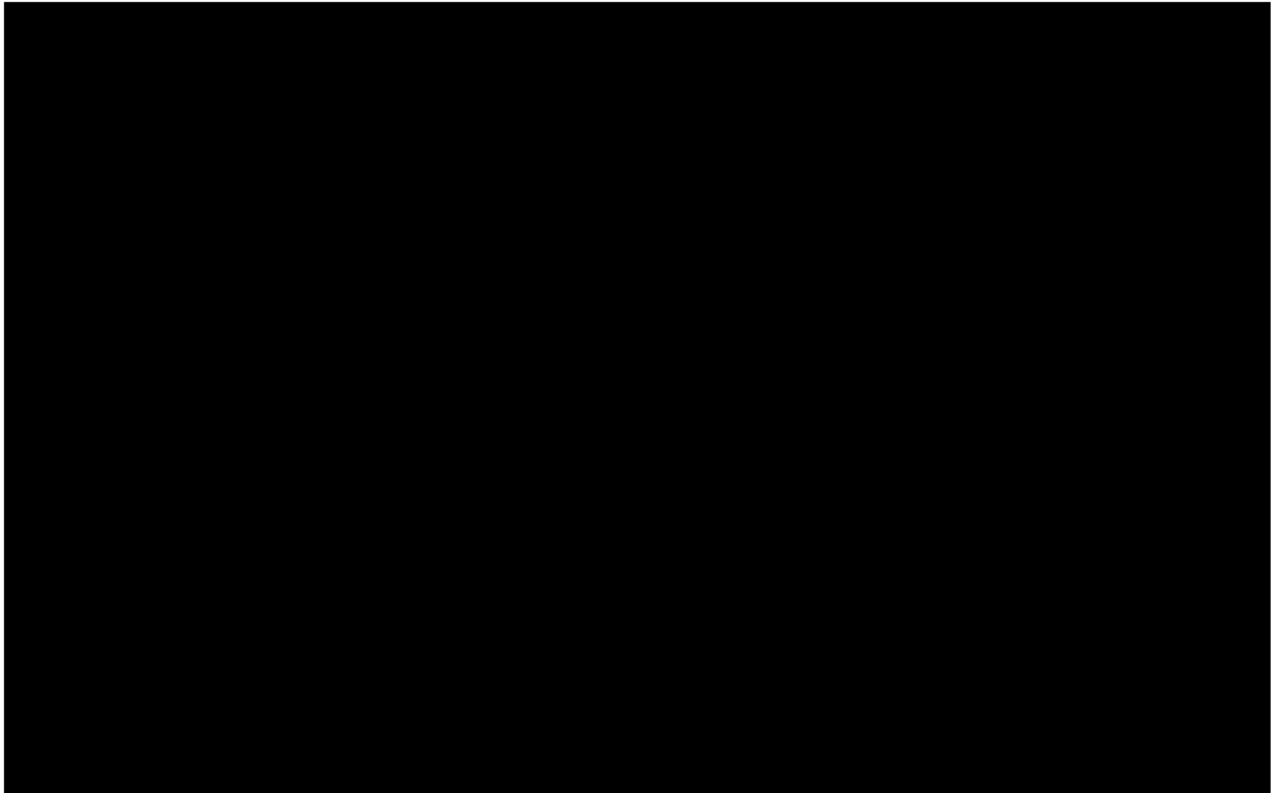
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Caesars Sportsbook



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Caesars Sportsbook

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New York State Gaming Commission
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See *Exhibit G – Cryptographic Control Policy* [CONFIDENTIAL]
See *Exhibit H – Information Classification and Handling Policy* [CONFIDENTIAL]
See *Exhibit I – Cryptographic Standards* [CONFIDENTIAL]

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See Exhibit J – Compliance Report and Log Overview **[CONFIDENTIAL]**

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H. Integrity monitoring and reporting, including any current affiliations related to integrity monitoring

Event wagering systems regulated in the U.S. are typically required to formally identify a set of "critical components" (also known as "regulated components") that require a higher degree of change governance and live monitoring.

For instance, to comply with GLI-20 and GLI-33, West Virginia requires:

- A daily report showing the signature of each instance of a critical component, as a means of determining that all running instances are using the approved versions
- A process to detect and shutdown a critical component that has changed without the correct change management authorization

The specific requirements are described by GLI-33 2.3.2, 2.3.4, 3.2.3, and GLI-20 3.2.2.

It is expected that other jurisdictions will adopt these or similar requirements.

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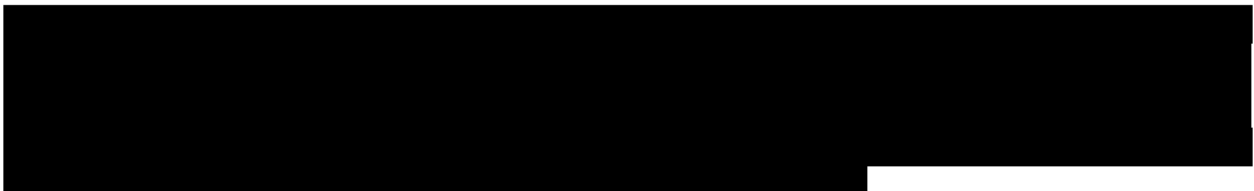
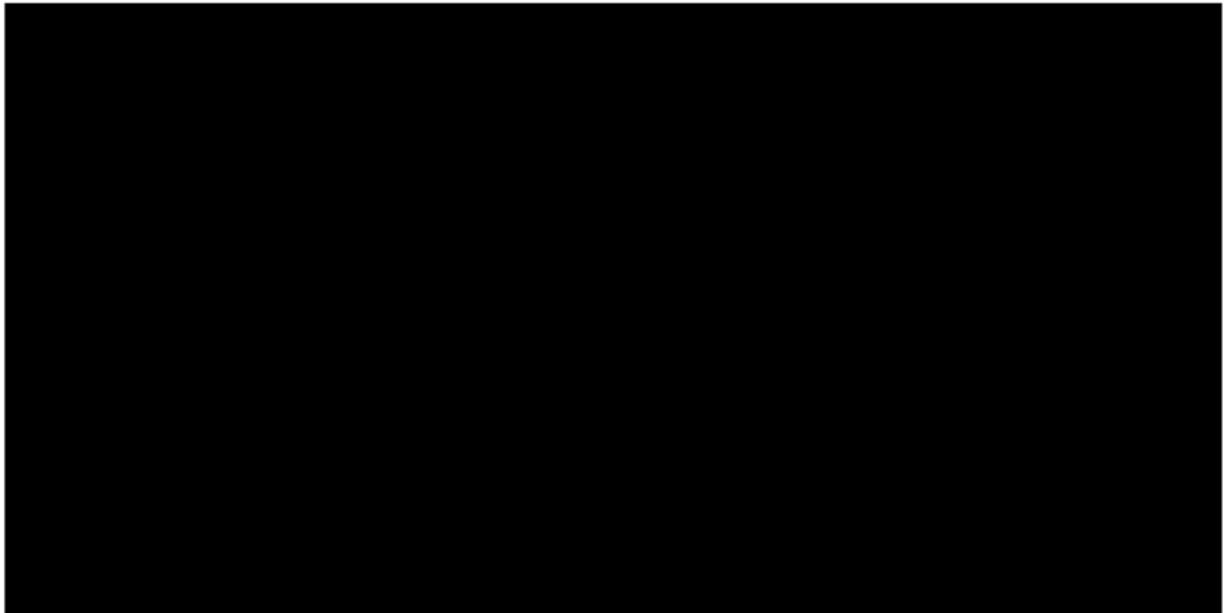
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I. Responsible Gaming

Promoting responsible gaming is part of the heritage and culture of Caesars Entertainment. It's the foundation of our Code of Commitment, which spells out the principles that govern the way we do business. Our company's long-standing and continuing commitment to responsible gaming is something we take great pride in. Caesars' position on this issue is clear: We want everyone who gambles at our casinos, racinos, off track betting locations, as well as on our online gambling products to do so for the right reasons – to simply have fun. We believe that all entities involved in legal wagering have an obligation to promote responsible gaming and address underage gambling.

Caesars responsible gaming (RG) program closely parallels the RG emphases, policies, and requirements of New York state statutes and regulations. Caesars will have no difficulty integrating New York state requirements into its overarching corporate RG program and operating New York-specific components in parallel with our corporate program. We expect the integration to be seamless, given the similarities of the New York requirements (including, but not limited to, employing training, outreach and advertising, prevention of underage gambling, self-exclusion, and incident reporting) with our own efforts and our decades of demonstrated multi-jurisdictional RG expertise.

If selected as the Operator, Caesars will apply its expertise in the Responsible Gaming space to provide, pursuant to § 5330.34,

1. A publicly accessible internet page dedicated to responsible play; and
2. Provide a link which will appear on the Caesars website, mobile application or electronic platform on which an authorized sports bettor may place sports wagers through as required by Racing, Pari-Mutuel Wagering and Breeding Law section 1367-a(4)(a)(xiv).

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While the Responsible Gaming internet page will be tailored specifically to the requirements of § 5330.34, examples of Caesars' industry-leading Responsible Gaming materials can be found [here](#).

Caesars dedicated responsible play page shall include:

1. A statement of our policy and Code of Commitment to responsible gaming;
2. Information in regard to, or links to information in regard to, the risks associated with gambling and the potential signs of problem gaming;
3. The availability of self-imposed responsible gaming limits within our website or mobile application;
4. A link to an appropriate problem-gaming webpage maintained by the office of addiction services and supports; and
5. Such other information as the commission may direct

In addition, Caesars acknowledges that it must submit a responsible gaming plan annually on or before September 1st to the commission for approval, as required by Racing, Pari-Mutuel Wagering and Breeding Law section 1367-a(4)(a)(xv).

The plan will include, at a minimum:

1. the objectives of and timetables for implementing the plan;
2. identification of the persons responsible for implementing and maintaining the plan;
3. procedures for identifying users with suspected or known problem-gaming behavior;
4. procedures for providing information to users concerning problem-gaming identification and resources;
5. procedures to prevent gaming by minors and self-excluded persons; and
6. such other information as the commission may direct.

The plan submitted as required by section 1367-a(4)(a)(xv) will also adhere to Caesars' Philosophy and Approach to Responsible Gaming, meet the high standard set by Caesars leadership in the Responsible Gaming Space, comply with Caesars Restriction and Exclusion Policy, utilize Caesars proprietary and trend-setting Responsible Gaming Application, and use Caesars industry-best Responsible Gaming training programs.

Caesars Philosophy and Approach

Caesars integrated approach to responsible gaming is built on clear objectives, measurable outcomes and scientific research and evidence. It is supported by professional staff training and state of the art, purpose-built information technology systems.

Caesars is unique within the industry in the development and deployment of RG programming that meets each of the following standards:

- **Incorporates learnings from leading academics in the field of responsible gaming research.** When originally formulating the company's responsible gaming training program in the late 1980s, Caesars consulted with leading scholars such as William Eadington, Julian Taber, and Henry Lesieur. More recently, Caesars consulted with a new generation of internationally respected researchers, including Dr. Robert Ladouceur, Dr. Carl Braunlich, and Dr. James Whelan, and clinicians in the latest evolution of its responsible gaming training curricula.
- **Uses impartial, evidence-based data to inform the development of policies, programs, and procedures.** Caesars' responsible gaming policy, the training that implements it, and the proactive conversations employees have with customers about their gambling were either crafted by independent leaders in the field of responsible gaming and problem gambling or independently validated across properties.

- **Provides employees with the knowledge and skills to actively recognize and respond to customer requests for responsible gaming-related information and referrals, as well as to recognize, respond to, and report responsible gaming-related incidents.** Caesars has been providing RG training to employees since the late 1980s, and the training has evolved over the decades to increasingly leverage employees' desire and willingness to engage customers who may be experiencing problems related to gambling. For 16 years across the company, Caesars has tracked RG incidents and conducted conversations with customers about their gambling independent of any request for responsible gaming or problem gambling information.
- **Includes initiatives that educate people about the key principles of gambling, demonstrate how games work, offer tips on responsible play, and provide problem gambling treatment referral and support.** The cornerstone of RG is the informed consumer. Caesars recognizes that fostering the potential for individuals to make healthy decisions across a range of products and activities is the critical starting point for public health policy based on informed consent. Caesars wants guests to make decisions about their gambling based on accurate and relevant information.
- **Integrates responsible gaming with every aspect of the operation.** At Caesars, RG programs are not simply a training course or compliance measure. Everything an operator does has to promote responsible gaming and the effort must be sustained, not just one ancillary class or a brochure. Caesars takes a multi-dimensional approach to RG, ensuring that the company's responsible gaming ethic is ingrained into every aspect of the company structure and culture.
- **Provides responsible gaming training for all employees, with specialized training-based employees' roles in the business.** It is important to create awareness of the issue among all employees because each plays a crucial part in the company's mission to promote RG. A comprehensive education and awareness program helps employees understand the company's responsible gaming policies and their roles in promoting RG.
- **Leverages employee customer service skills to deliver RG services, with clear delineation of responsibilities and practical tools for those employees who interact directly with customers.** 16 years ago, Caesars made the decision to do what no one else was doing and started proactively engaging guests about RG by integrating the program into customer service processes. Today, Caesars is very pleased to see other companies have incorporated this customer service ethic into RG policy through the broad adoption of Responsible Gaming Ambassadors, a role conceived and created by Caesars.
- **Is validated through transparent analysis.** In addition to commissioning academic researchers to conduct an independent analysis of the effectiveness of RG activities, Caesars welcomes third-party reviews of its efforts. This year, Caesars commissioned the independent and well-respected Responsible Gambling Council to assess its Responsible Gaming program and provide strategic advice on future innovations and advancements. Caesars will also report to the Sustainable Accounting Standards Board guidelines in its 2020-2021 Corporate Social Responsibility Report.

In 2012, Caesars Windsor became the first casino to ever receive accreditation under the Responsible Gambling Council's RG Check program. Caesars was also the first gaming company in the UK to receive accreditation by ACE (Accreditation, Certification, and Evaluation).

- **Recognizes the primacy of oral communication in delivering responsible gaming as opposed to identifying "red flag" behaviors.** Most RG training involves teaching so-called "red flag" behaviors or diagnostic criteria for diagnosing a gambling disorder. Experts that consulted for Caesars on its responsible gaming policies identified no consensus on whether or which behaviors are indicative of problem gambling within the casino environment. Therefore, Caesars RG training primarily focuses on verbal behaviors – statements or comments that customers might make, or that others might make about them -- rather than physical behaviors. However, physical, non-verbal behaviors are hardly ignored. To the extent that physical behavior manifests distress or otherwise

disrupts the casino floor, the company initially treats such behaviors as security or customer service issues. If during the course of resolving those issues customers make statements concerning negative effects of gambling, then those statements trigger the RG procedures.

- **Develops and employs RG-specific technology.** Technology should not only provide automated tools for compliance with RG mandates, such as limits on entry or enforcing exclusion requests, but should also provide a means to offer prevention and identification tools for those customers requiring concern. Caesars has technology tools that identify and prevent restricted and excluded patrons from obtaining casino services, such as RG2 and the Responsible Gaming Identification at Slots. Further, Caesars RG2 application allows the company to collect information regarding concerns about patrons' ability to gamble responsibly, allowing this data to be assessed over time to determine if a Responsible Gaming Ambassador should proactively engage the customer in an RG-related conversation.

Examples of Caesars Leadership

Caesars has been recognized as the industry leader in RG over the years and has an unparalleled track record in leading the industry through RG innovation. In fact, Caesars pioneering RG initiatives set the industry standard.

In the 1980s, Caesars (then Harrah's) established the first task force to study problem gambling issues and subsequently implemented the industry's first RG initiatives. Caesars' early efforts to encourage responsible gaming earned the company's CEO a lifetime achievement award from the National Council on Problem Gambling in 1990.

Caesars' long-standing commitment to RG involves many "firsts" in the industry and Caesars continues to set the industry standard today:

- 1989 – Caesars implemented Project 21, which educated and trained its entire workforce that it is every employee's responsibility to deter underage gambling and service of alcohol beverages to minors.
- 1995 – Caesars, in partnership with AT&T and the National Council on Problem Gambling, established the industry's first national toll-free helpline for gamblers who might need assistance. Caesars was also the first casino company to provide that helpline across a constellation of customer contact points.
- 1999 – Caesars became the first casino company to offer nationwide self-exclusion and self-restriction options that would be honored and applied across the Caesars network of properties.
- 2000 – Caesars was the first company to create and implement an operating code. The Code of Commitment was the U.S. casino industry's first formal social responsibility code of conduct, and it served as the model for the American Gaming Association's Code of Conduct for Responsible Gaming, enacted in 2003.
- 2000 – Caesars was the first casino company to develop an RG program specifically designed to leverage customer service skills of employees and integrate RG into the customer service model.
- 2000 – Caesars became the first casino company to establish a Marketing and Advertising Code, creating standards that remain much more stringent than industry guidelines and legal requirements.
- 2002 – Caesars was the first casino company in the United States to develop and broadcast a series of television commercials devoted entirely to communicating an RG message and promoting the helpline. The campaign featured senior company executives as well as frontline employees

reinforcing the importance of gambling within a budget, being of legal age and playing strictly for entertainment. The commercials also provide information to those who may have a problem on how and where to turn for help.

- 2003 – Caesars created first-of-its-kind RG training, developing the role of Responsible Gaming Ambassadors. Caesars is proud that in recent years other operators have followed the company's lead and implemented RG Ambassador-based programs.
- 2004 – Caesars developed RG technology that supports its self-exclusion and self-restriction programs and is a relied upon reference tool for all RG matters. Caesars was the first casino company to develop and implement an "RG Log" technology solution to record, track and evaluate employee concerns that a customer may not be gambling responsibly.
- 2012 – Caesars was the first casino company in the United States to create and implement technology (RGID@slots) to identify self-excluded patrons carding-in at a slot machine.
- 2013 – Caesars introduced its first-ever online gambling product and expanded enforcement of all self-exclusion requests related to online gaming to its land-based facilities.

Caesars is proud to have blazed the trail for the industry. In 2000, the Gaming Hall of Fame, a panel of peers in the commercial casino industry, bestowed on Caesars its first-ever Special Achievement Award for its leadership and pioneering RG programs.

Caesars is committed to using the latest scientific research to continually improve and innovate. Caesars maintains close relationships with academics and clinicians, and continuously reviews published RG research. Caesars also seeks to continuously improve its knowledge about RG by regularly engaging in dialogue with researchers, scholars, treatment providers, recovering problem gamblers and other informed stakeholders. Caesars' RG programs are cutting-edge, employing technology and programs that encourage guests to play responsibly and empower employees to effectively respond to potential gambling-related problems.

For more information on responsible gaming, [click here](#).

Caesars operates approximately 50 casinos and has extensive experience successfully operating an internal self-exclusion program as well as state-sponsored self-exclusion programs with a variety of requirements in various jurisdictions. While Caesars will tailor its restriction and exclusion program to meet the regulatory standards developed in New York, the following is an overview of Caesars current U.S. RG restriction and exclusion policy.

Caesars Restriction and Exclusion Policy

Caesars' goal is for customers to enjoy themselves with gambling and other entertainment activities. If gambling does become a problem, Caesars honors customer requests to restrict access to gaming-related services, such as direct mail, casino credit, check cashing privileges, as well as casino play privileges. Under the Caesars program, customers have the option of self-restricting or self-excluding for one year, five years, or permanently.

Self-restrictions and self-exclusions extend to all Caesars owned, operated, and managed properties, meaning that if a customer self-excludes from one property then he is excluded from all properties in the Caesars brand across all states.

Also, while the vast majority of restrictions and exclusions are done on a voluntary basis, customers may have temporary restrictions placed on casinos privileges or may be permanently banned at the company's discretion. If Caesars receives substantial reliable information that a patron does not responsibly engage in gaming, it reserves the right, in its sole discretion, to exclude the patron from its casinos or to restrict the patron's access to its programs and services, after first attempting to review the matter directly with the

patron. The policy establishes a three-person review panel at the corporate level that may place company-imposed limits on a patron's gambling privileges, if the panel determines there is an unreasonable risk that the patron does not responsibly engage in gambling.

Caesars Responsible Gaming Restrictions and Exclusion Policy, which is provided as an attachment for your reference, provides more detailed information.

State-Sponsored Exclusion

In addition, Caesars applies those restrictions or exclusions on a system wide basis to all Company properties, unless prohibited by law. In other words, an individual who self-excludes through a state sponsored exclusion program is excluded at the Caesars property located in that state as well as at all properties owned, managed or operated by Caesars outside of that state.

Procedures for Identifying Excluded Persons and Preventing Transactions

Caesars self-exclusion program is based on the well-accepted principle that the primary responsibility to prevent breaches of a self-exclusion agreement belongs to the individual. Self-exclusion should be viewed as a tool that problem gamblers can use to help acknowledge and take personal responsibility for their gambling problems.

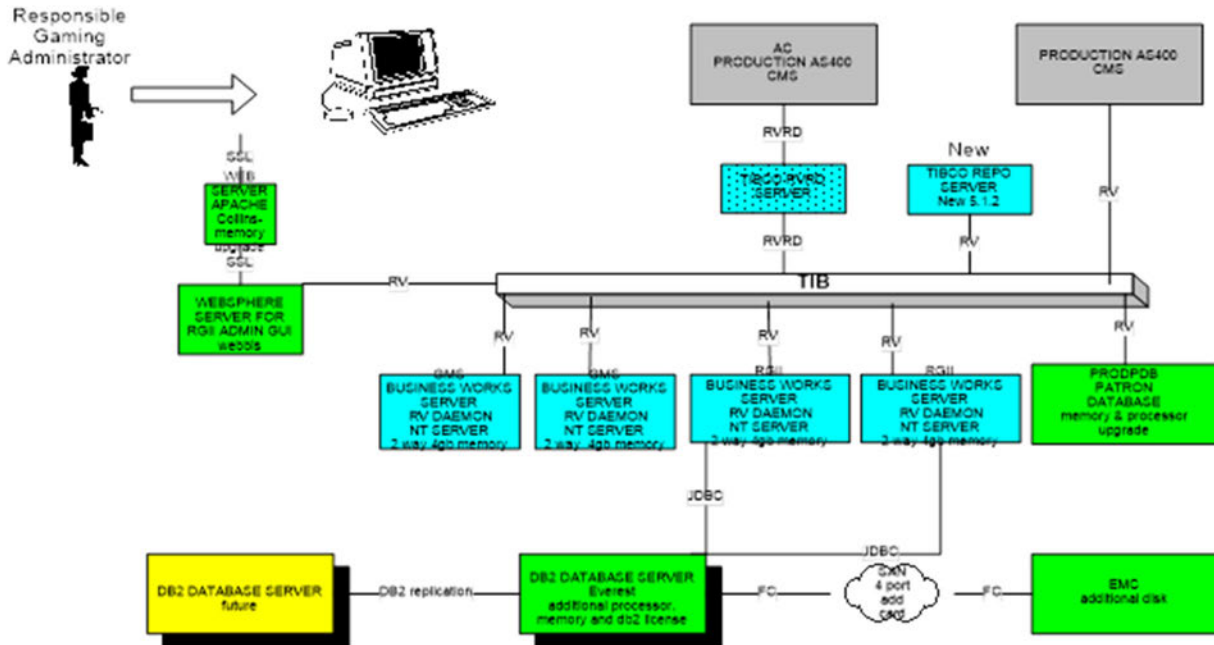
While measures can be implemented to unilaterally restrict patrons from engaging in gambling activities, the RG community has accepted that active engagement by the participant in his/her recovery is more effective at addressing the root issues. Ultimately, the question that must be addressed by policymakers interested in implementing an effective self-exclusion program is whether the program's intent is concerned about the overall mental health of the individual or just concerned about preventing them from casino gambling.

Advocating a personal responsibility approach does not equate to not having processes in place to assist patrons with adhering to self-exclusion agreements. Casino operators must make reasonable efforts to detect self-excluded individuals at gaming properties. To that end, Caesars utilizes an assortment of tools to identify and prevent prohibited transactions with restricted or excluded patrons.

Responsible Gaming Application (RG2)

To support the RG program, Caesars has made significant investments in technology. Caesars invested \$3.4 million to create a patented, proprietary RG information technology application, RG2. RG2 is a standalone system that provides for the entry, viewing, modification, and reporting of patron's gaming status, to manage self-exclusions and self-restrictions enterprise wide. This application interacts with other key systems in Caesars' IT infrastructure to automate the prevention of prohibited transactions, such as check cashing, credit extension, mailings, extension of comps, printing of player reward cards, printing a W2G tax receipt, and access to account information via Caesars' website. Users of this service are introduced to a centralized system having a web-based interface. Key touch points for check cashing and credit extension via the Casino Management System (CMS) invoke checks to RG2 directly as part of the business logic. Offer mailings use RG2 information to suppress excluded patrons from mailing lists.

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Further, RG2 automatically updates a patrons' account in the casino management system (CMS) to code the account as a responsible gaming restricted or excluded account. This allows casino staff across Caesars' network of properties to immediately see that a patron is excluded once the account is accessed in CMS or Caesars other IT systems.

Employee Identification

To assist with identification of patrons who breach self-exclusion agreements, Caesars' employees view pictures of self-excluded patrons, if available and allowed by applicable law, to broaden the pool of employees that may identify self-excluded patrons in the venue. To increase vigilance for detection of self-excluded patrons, at many properties, Caesars has instituted a program that provides an employee incentive for identifying self-excluded patrons outside of the employee's normal job function.

Deterrence Mechanisms

To deter excluded patrons from gambling, Caesars withholds any identifiable winnings, including jackpots, from identified excluded patrons and donates these funds to an appropriate governmental or non-profit responsible gaming research or treatment organization, in accordance with applicable law.

Caesars frames responsible gaming within customer care, as leveraging employees' customer service skills and Caesars' emphasis on customer service as a differentiator are the impetus and foundation of its policy of reporting concerns, and the training that implements it.

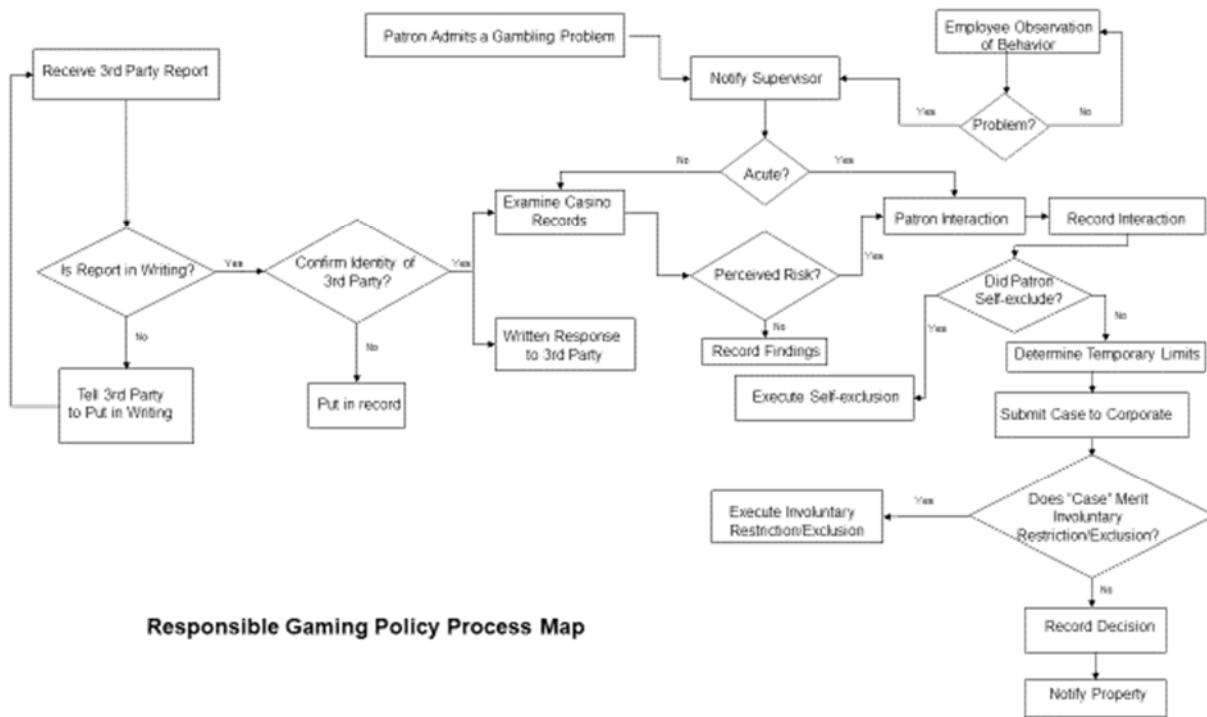
Policy of Reporting Concerns

Caesars consulted with academics, researchers, and clinicians in the development and implementation of a first of its kind responsible gaming policy of directly intervening with casino customers because of the effects their gambling may cause. This policy and the employee training that supports has been independently evaluated and endorsed. Caesars is proud that its ground-breaking RG program was the catalyst and model for similar RG training and RG Ambassador programs across the industry.

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A key feature of the Caesars program is that employees are required to act on their own concerns in a situation where RG may be an issue. This may arise from interaction with customers or a third party. It could occur at any time or in any part of Caesars venues, when a customer says something to suggest they may not be gambling responsibly. Casino employees, in turn, become concerned when they are aware that their customers experience negative consequences related to their gambling and report these concerns to a supervisor.

Caesars trains all customer contact employees to report to a supervisor any comments that cause concern that a patron may not be gambling responsibly. A select group of employees at each property known as Responsible Gaming Ambassadors (RGAs), who are senior employees specially trained and empowered to conduct conversations about responsible gaming with customers, receive these reports of employee concerns and may meet with a customer to discuss the concern. There is a well-defined structure for these meetings based on the principles of motivational interviewing, an empirically supported approach to promoting behavioral change. Fundamental to this approach is that the customer himself is the agent of change, who needs the support and not pressure from the RG Ambassador.



During this RG conversation, the RGAs may provide information to customers about responsible gaming while discussing options available for assistance, such as self-restriction, self-exclusion, and the applicable helpline number.

In addition to offering information on the helpline number and self-exclusion and restriction options, Caesars' RG Ambassadors provide a list of qualified treatment professionals, including mental health, behavioral health, and other professionals, as well as information regarding community problem gambling organizations. The same information is also provided to customers who choose self-restriction or self-exclusion options, as well as to employees, family members reporting concerns and other parties interested in resources related to gambling addiction and RG.

The goal is to give people the knowledge and opportunity to help themselves by providing meaningful alternatives for assistance and is consistent with a body of research suggesting that programs and

technologies must be coupled with a more comprehensive plan to connect those in need with appropriate service providers.

What triggers the process just described are customer comments that cause concern, not behaviors. Behaviors are often ambiguous and there is, in fact, no consensus concerning behaviors on the casino floor that predict or demonstrate problem gambling. However, behaviors are not ignored. Caesars has security and customer service processes in place to deal with behaviors and these processes are linked to its RG program. When dealing with a behavioral issue, if any comments are made that cause concern from an RG perspective, then the RG procedures are applied.

Responsible Gaming Training

Operation Bet Smart®: Know When To Stop Before You Start® is a program designed to formally train employees about the importance of responsible gaming and the policies and procedures of Caesars' Responsible Gaming Programs.

Caesars' training emphasizes appropriately responding to customer statements about their gambling and its effects, as an extension of the company's customer care responsibilities, and distinct from formal or informal gambling disorder "assessment" or "diagnosis."

Modules

Caesars currently use three main responsible gaming employee training modules:

- **Module I** – "RG Awareness" – This training is provided to all employees. This module provides an overview of Caesars commitment and leadership on RG, along with an overview of gambling addiction that emphasizes its complex causes, its prevalence, its impact, and resources that are available to addicted gamblers.
- **Module II** – "Roles in RG" – This training is provided to all customer contact employees and all supervisors (these individuals also receive Module I training). This module delineates the varied roles of front-line employees, supervisors and RG Ambassadors (described below in Module III) in implementing Caesars RG policies. It focuses on the kinds of statements customers might make that should be reported to a supervisor. The training distinguishes RG concerns from customer satisfaction and security issues and explains what employees should expect after they report a concern to a supervisor.
- **Module III** – "Responsible Gaming Ambassador Training" – Caesars provides this additional training to a select group of employees at each property who are empowered to conduct conversations about RG with customers. Module III is highly interactive, requiring role-playing and discussions about how to handle various scenarios that may unfold on the casino floor. This module covers how and when to conduct RG conversations with customers, what kinds of assistance can be offered to customers and information on how to use Caesars RG information technology tools that provide for the entry, viewing, modification and reporting of patron gaming statuses, as well as logging of interactions and exceptions.

Additional Technical Training

Training for property RG Chairpersons, RG Administrators, and RG Ambassadors also includes technical training on the company's proprietary RG information technology application (RG2). This training includes system training of related to creating RG Log entries as well as entering exclusions and restrictions into RG2.

To further Caesars' efforts to identify responsible gaming excluded patrons, surveillance, security, and RG Chairpersons receive additional training regarding responding to alerts from the RG identification at the slot machine system (RGID@slots). This training details actions to take once an excluded patron's player card

has been identified as being inserted into a slot machine, as well as how to code these alerts in the casino management system and create a record of these incidents and the outcomes.

Specialized technical RG training is also provided to other employees, depending on their roles in implementing the company's RG programs. For example, cashiers are required to check for restrictions and exclusions when processing requests for check cashing, credit card advances and the granting and extension of credit. Caesars Rewards employees, for example, are trained to check systems for an RG status before opening an account, reprinting a Caesars Rewards player card, or fulfilling a request for comps.

Our Code of Commitment

At Caesars, our Corporate Social Responsibility communication framework is PEOPLE PLANET PLAY (PPP). It is a reflection of our mission, our values, guiding principles reflected in our Code of Commitment.

Our Code of Commitment governs the conduct of our business. It is our public pledge to our guests, Team Members, communities, business partners and all those we reach that we will honor the trust they have placed in us. The Code illustrates our robust platform of corporate governance, ethical conduct and integrity.

PPP is how Caesars utilizes a triple-bottom line approach to provide a positive, sustainable, impact on the lives of our people, our communities, and our planet.

For more information on Caesars' Code of Commitment, [click here](#).

Community & Stakeholder Engagement

Caesars takes a leadership role in developing vibrant communities wherever we operate. Stakeholder engagement is driven through our social responsibility, business inclusion and policy partnership efforts with local governing bodies, non-profits and advocacy organizations, business associations and academic institutions.

Caesars is a significant contributor to regional and national causes through its private Caesars Foundation, Corporate Social Responsibility & Diversity, Equity & Inclusion department and local property reinvestments. The millions of dollars donated each year advance philanthropy and year-around partnerships with dozens of organizations such as the National Council on Problem Gaming, National Minority Supplier Development Council, Clean the World Foundation, Sustainable Brands, DisabilityIN, and UnidosUS. Some examples of our work include:

- Caesars Foundation's annual contribution to the International Center of Responsible Gaming with a \$150,000 grant to further independent research on gambling disorder.
- In the 19th year of our relationship with Meals on Wheels of America, the Caesar Foundation granted \$250,000 to extend its Friendly Visitor Campaign to fight social isolation and loneliness of homebound seniors.
- Caesars Economic Equity Tour with the Women's Business Enterprise National Council (\$140,000) – the annual live and virtual events provide year-round learning opportunities and resources for small businesses owned by women of color and non-profit leaders. Workshop topics include capacity building and access to capital, marketing and sales skills, improved management and operational readiness to execute larger contracts and corporate customers or sponsors.

In spite of operational challenges due to COVID-19, in 2020 Caesars donated \$8.8 million to local community partners through discretionary giving, Caesars Foundation grants and Team Member volunteer hours.

6.4 CAPACITY TO BRING AUTHORIZED SPORTS BETTORS TO PLATFORM

The Applicant shall demonstrate the Applicant's ability to effectuate rapidly the commencement of mobile sports wagering on the Applicant's platform and to bring Authorized Sports Bettors effectively onto the Platform.

The Applicant shall provide a time from award of license to the date on which each Operator shall be prepared to accept mobile sports wagers through the Applicant's Platform.

Caesars owns its proprietary mobile sports betting technology, including front and back end. Caesars has already invested in the hardware required for New York to support the anticipated level of customer accounts and wagering volumes. We have and continue to perform hardware and software configuration and testing based on the draft regulations and will finalize our New York State build when regulations are final. If we are awarded a license, this will allow a launch date of about six to eight weeks post receipt of the finalized New York sports betting regulations and subject to the designated casino datacenter being built to our specifications. If these items are satisfied on the date of award of the license rather than some time prior to the award, Caesars would be prepared to accept mobile sports wagers six to eight weeks post the award.

6.5 WORKFORCE DIVERSITY

The Applicant and each of its Operators shall provide information demonstrating how the Applicant fosters racial, ethnic and gender diversity within the organization's workforce. Such demonstration shall include:

- A. the organization's policy on workforce diversity; and
- B. workforce demographics demonstrating the organization's current workforce diversity

Caesars' Commitment to Workforce Diversity and Workforce Demographics

Diversity, Equity & Inclusion is very important to Caesars. We recently set new, aggressive targets to increase representation of women and people of color in the company by 2025. For some levels within the organization, such as leadership, we have a strong base – currently 44% of our leaders are women. At the senior-level, however, which we see as critical for the long-term success of the company and where we plan to make investment, we have a bigger hill to climb [REDACTED]

Similarly, with racial diversity, our overall leadership levels are not far from our target of 50% [REDACTED], but we need to make significant improvement in our senior leadership level roles [REDACTED].

Our 50/50 by 2025 goals are:

- Women: 50% of management roles will be held by women within both the mid-level and senior leadership populations.
- Racial/Ethnic: 50% of mid-level leadership roles will be held by people of color. We also commit to increase the representation of people of color in senior leadership by 50%.

For more information on Caesars' Diversity, Equity & Inclusion, [click here](#).

National Diversity Relations & Supplier Diversity

Core to Caesars' external relations strategy are our National Diversity Partners and Supplier Diversity initiatives. Caesars Entertainment works to achieve diversity and inclusion by striving to attain both equity and equality within our corporation and all the suppliers we with whom we work. We are committed to procuring our products and services from a diversified pool of vendors, contractors and professional service providers. We are also committed to working with developing businesses to help them build capacity. In 2019, certified diverse spend comprised 10.8% of operational expenditures and 17.6% of capital expenditures. We continue to diversify our supplier base and procurement spend with minority and women owned, LGTBQ, veteran, disabled and disadvantaged business enterprises. Some of our valued partners include:

- Supplier Diversity & Minority Business Advocacy Associations:
 - United States Hispanic Chamber of Commerce
 - United States Black Chambers, Incorporated
 - United States Pan Asian American Chamber of Commerce
 - National Veteran-Owned Business Association
 - National LGBT Chamber of Commerce
 - National Center for American Indian Enterprise Development
 - National Association of Minority Contractors

- Civic Engagement, Civil Rights and Workforce Development Organizations:
 - 100 Black Men of America
 - OCA Asian Advocates
 - Seramount (formerly Diversity Best Practices)
 - Global Gaming Women
 - Human Rights Campaign
 - League of United Latin American Citizens
 - National Association for the Advancement of Colored People
 - National Association of Asian American Professionals
 - National Organization of Black Law Enforcement Executives
 - National Urban League

Our relationships with these partners have been long-standing, many over 10 years, and involve memberships, events, and advocacy-policy support.

We have always been a business with a strong social conscience. We deliver a positive social contribution through best in class and award-winning strategies with environmental sustainability, social safeguards, community reinvestment and social-economic equity top of mind. Some of our most recent recognitions (2021) include independent assessment by: Points of Light, the world's largest service organization, securing a place for the 7th consecutive year on its Civic 50 list; CDP (formerly Carbon Disclosure Project) recognizing Caesars' work to combat climate change and manage water security risks along with our engagement of suppliers on their own climate action (A-scores for CDP Climate and Water, and placement on Supplier Engagement Leaderboard in 2021); Human Rights Campaign and Disability Equality Index named Caesars as Best Places to Work awards for LGBTQ and Disability Inclusion (respectively).

For more information on independent reviews and awards, [click here](#).

For Caesars' Corporate Social Responsibility reports, [click here](#).

C. Efforts the Applicant and Operators will undertake to foster workforce diversity as it relates to operations undertaken pursuant to a License, if awarded

Caesars intends to extend its workforce diversity strategy, resources and investments if awarded a license in New York. Over the past year, the company has invested in human capital through transformative enterprise human resource systems, developing a corporate talent acquisition and development team.

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Caesars offers ongoing programs to enhance and cultivate a culture of belonging through seven diverse employee resource groups (called Business Impact Groups), and frequent educational town halls with national diversity partners. The corporate Diversity, Equity & Inclusion and Talent Development Teams regularly work with local executives in each state to offer recruiting, learning and development programs:

- **Recruitment and Employment:** We focus on community stewardship, academic partnerships, employment branding and advertising, vendor relationships, sponsorships, and early identification plan to improve employment opportunities within the local community. In each of these areas, we have developed action steps for driving diversity and inclusion for the company.
- **Hiring Process:** Our goal is to ensure diversity and inclusion in our hiring decisions. We have and will continue to engage a diverse group of skilled interviewers to help us in our candidate selections. Our executive team is extremely involved in our process as a screen for diverse talent as well as diverse candidates.
- **Employee Relations:** We are proud of our existing policies that support a strong work/life balance for all employees. We have developed and enforced policies that are EEO complaint and uniformly applied and administered. All policies and procedures are written to be fair and consistent. These include a no-fault attendance policy and a strong anti-harassment policy.

Training & Development programs exemplify the training and education available to effectively assist employees at all levels to grow their careers, improve their skills and explore expanded opportunities with the organization. Diversity and inclusion principles are integrated into each of these training modules. Each of these programs is administered by the Human Resources Department and each Caesars Team Member is required, as appropriate, to participate in the applicable program. Some of the programs include:

- **New Hire Orientation (Welcome to the Empire) “NHO”** – Welcome to the Empire fosters the engagement of our new hires with innovative yet simple content and strong links to organizational strategies and programs. Newly hired employees will begin work knowledgeable and excited about working for Caesars Entertainment. Upon completion of NHO new hires will be equipped to describe and discuss Caesars Entertainment organizational culture and standards, describe the basics of the Caesars rewards loyalty program, and have knowledge, an understanding, and an ability to exceed guest expectations, making them feel like part of the family.
- **Educational Opportunities** – Caesars makes available to all its employees basic online and classroom training tools and initiatives that are geared to assist employees develop basic skills. These trainings include technical training for on-the-job performance, personal development training such as: Cross Departmental Training, a Tuition Reimbursement Program along with university partners that offer discount tuition, an eLearning platform that includes 100s of personal and professional development programs, and in-person and virtual learning events.
- **Legendary Leadership Essentials** – Legendary Leadership Essentials (“LLE”) provides current leaders within the organization the tools and techniques to foster employee engagement and drive performance. Upon completion, our LLE leaders will be equipped to build meaningful, authentic relationships with their employees, analyze employees’ strengths in order to leverage and fuel performance, and deliver effective (just-in time) feedback and coaching.
- **Leadership Development Series** – Having a strategic succession and talent planning process serves the dual purpose of developing emerging leaders while protecting the organization from risk. At Caesars, building capabilities by reinvesting in our Team Members is a priority we believe provides us a competitive advantage. As part of the semi-annual planning process, we look deep into our organization to identify potential leaders we invest in through structured learning programs, mentorship and exposure to senior leadership teams. In support of the long-term goals regarding gender and racial diversity among the leadership population, there is ongoing discussion about how to identify and nurture a diverse slate of succession candidates for each major talent pool

category. These may include quarterly workshops that are facilitated by various leaders on property and external thought leaders. This series is intended to provide our key leadership with the tools to create a highly engaged workforce, advance their personal career, and improve customer interaction. In some sessions, participants read a business book prior to the workshop and then attend the workshop to engage in discussion around the key principles presented in the book. In other instances, the training all happens in the training center and will include role plays and group discussions.

- **Unconscious Bias Training** – The program was delivered widely throughout Caesars during 2019/2020 to team members from across the organization, including our senior executives and Board of Directors. We see this as a fundamental step in raising awareness and encouraging the accountability of all team members for creating an inclusive culture.

One program which ties together aspects of culture, development, talent acquisition and learning is our diverse Employee Resource Group BIGs (Business Impact Groups). Our formal groups include veterans, active-duty military, and families (Salute); women and Allies (SAAVY), Black/African American Diaspora and Allies (CHORUS), Lesbian Gay Bisexual Transgender Queer Team Members and Allies (EQUAL); Hawaiian Asian Pacific Americans (HAPA) and Allies, Latino/Hispanic Latinx and Allies (Via). In 2021 we are also branding and launching a new national Disability Inclusive Employee Resource Group which emphasizes disability and mental health. BIGs bring self-identifying, like-minded team members and allies together to support each other and our communities through dimensions of diversity. BIG goals address inclusive marketing, recruitment, professional development, supplier engagement and community service.

As a leader in diversity, equity and inclusion, Caesars' accolades include a number of firsts and onlys in gaming entertainment:

- 2021: First and longest running company to earn a perfect score on the Human Rights Campaign Corporate Equality Index, for 14 years running
- 2021: 50 most Community Minded Companies in America by the Civic 50, for 7 years running
- 2021: Caesars is the first gaming company named a "Best Place to Work for Disability Inclusion" by Disability Equality Index
- 2021: Caesars CEO pledge signed (CEO Action for Diversity & Inclusion), the first gaming company and for four years running

For more information on Caesars' awards and certifications for its commitment to and progress in policies regarding its employees, [click here](#).

6.6 OTHER FACTORS IMPACTING REVENUE TO THE STATE

The Applicant shall provide a narrative and analysis of any other factor or aspect of the Applicant's Application that the Applicant believes the Commission should take into consideration when evaluating other factors that could impact the revenue from mobile sports wagering paid to the State. The applicant shall limit all narrative and analysis in response to this section to no more than five pages.

Our consortium brings together a collection of strong, reputable companies, each with a distinctive brand and strategy for the marketplace. The diversity and reach of our Operator Applicants, in collaboration with their Platform Providers, will serve to drive incremental revenue to the State as we described in Section 6.8.

Importantly, our consortium is also partnered with two of the major tribal gaming operators in the State, the Oneida Indian Nation and Saint Regis Mohawk Tribe. In connection with a successful bid by our consortium, both tribes are prepared to waive certain rights aimed at enhancing the overall revenue opportunity for the

State's licensed sports wagering platforms. The quantitative analysis associated with these waivers is also presented in Section 6.8.

The Oneida Indian Nation and Saint Regis Mohawk Tribe's rights and proposed waivers are more fully described in this section.

Oneida Indian Nation

Waivers to Promote the Integrity and Sustainability of New York's Mobile Gaming Program

In addition to its Revenue Sharing Agreement set forth in Section 6.7, the Oneida Indian Nation also will commit to issuing to the State waivers of legal rights and privileges it enjoys, and legal challenges it may otherwise pursue, relating to the State's implementation of PML § 1367 for mobile sports betting (the "Oneida Waivers"). The Oneida Waivers would be executed upon issuance of operator licenses to Caesars and Wynn. The absence of these Oneida Waivers would jeopardize the integrity and sustainability of the State's carefully sculpted tax and competitive structure for generating State revenues under its mobile sports betting program.

Background: Oneida Rights and Privileges

Oneida and the State are party to two significant government-to-government agreements that affect the State's plan to authorize statewide mobile sports betting, and to charge significant taxes upon its licensed operators of that activity.

(a) 2013 Settlement Agreement

The Oneida Indian Nation, the State, Madison County and Oneida County entered a landmark Settlement Agreement in 2013. This historic agreement is regarded as a model for resolving disputes between States and tribes because it resolved generations of the most controversial disputes between them, ranging from reservation rights, land governance, property taxes, sales taxes, law enforcement, cultural preservation – and gaming issues. The Settlement Agreement was approved by the NYS Attorney General, and enacted into New York Law by the State legislature (see N.Y. Exec. Law § 11). The Settlement Agreement was approved by the federal court, which retained jurisdiction to enforce the agreement and any violations.

To date, both Oneida and the State have abided by all of their duties to each other under the Settlement Agreement. More than that, the Settlement Agreement formed the basis for unprecedented collaboration among Oneida, the State and local municipalities in addressing thorny issues of mutual interest, most recently including Oneida's hosting numerous coronavirus vaccination clinics for thousands of central New Yorkers through a joint program with the NYS Department of Health, Oneida County Department of Health and Madison County Department of Health.

Under the Agreement, the Oneida Indian Nation now pays the State, Oneida County, Madison County and eight other counties more than \$75 million per year. Oneida has paid the State more than \$465 million so far. Under the Settlement Agreement, those Oneida payments have been allocated among Upstate New York counties: so far, Oneida County has received more than \$130 million and Madison County has received more than \$35 million. These payments also have been distributed among eight other counties, including Onondaga County to fund its debt service for the bonds that financed the Lakeview Amphitheater.

In exchange for these payments, the State assured Oneida (among other things) "total exclusivity" with respect to Class 3 gaming, which includes mobile sports betting, in the ten-county region of Central New York. The Settlement Agreement couldn't be clearer: "The State shall not legalize, authorize or consent to" Class 3 gaming in violation of Oneida's ten-county exclusivity zone. This necessarily includes a requirement that the State shall not change the law to authorize Class 3 gaming within the Oneida exclusivity zone. While the Settlement Agreement includes some limited exceptions to the Oneida exclusivity zone (e.g., lottery, charitable events, then-existing games at Vernon Downs), the State neither requested nor negotiated an exception to Oneida's "total exclusivity" relating to mobile sports betting.

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Oneida expects the State to abide by the commitments it made to Oneida in the Settlement Agreement. Among them, the Settlement Agreement imposes upon the State an affirmative duty to prohibit non-Oneida gaming within the Oneida exclusivity zone. The State and Oneida agreed that the Oneida exclusivity protection is a material term of the Settlement Agreement. The State's breach of Oneida exclusivity would constitute a "Material Breach" of the agreement, which "shall be resolved exclusively by the United States District Court for the Northern District of New York."

Oneida, therefore, was troubled to read in the State's Common Response to First Questions, July 22, 2021, that the State believes it may adopt a law which authorizes customers to place mobile sports wagers within the Oneida exclusivity zone to non-Oneida servers. The State claimed that "there is no need for a Nation or Tribe to waive exclusivity" – directed toward Oneida, the only tribe in New York that enjoys exclusivity over all Class 3 gaming -- based upon the State's unilateral, statutorily-created "deeming" provision. The State's unilateral action would undermine Oneida's exclusivity in the Settlement Agreement. To the extent that the New York's mobile betting program conflicts with the Oneida Settlement Agreement, Oneida's rights under the Settlement Agreement supersedes the mobile sports betting program. See N.Y. Indian Law § 16 ("notwithstanding any other provision of law, the provisions of the Oneida Settlement Agreement . . . shall be deemed to supersede any inconsistent laws and regulations" (emphasis added)).

The Oneida Settlement Agreement resolved a federal lawsuit related to generations of disputes that arose under federal law. The Settlement Agreed is governed by federal law. It was approved by the United States District Court for the Northern District of New York, which ordered that it "retains jurisdiction to enforce the Settlement Agreement." *State of New York v. Jewell*, No. 08-CV-0644, 2014 WL 841764 (N.D.N.Y. Mar. 4, 2014). Federal courts have ruled that mobile gaming wagers occur both at the location where the customer places the wager and location of the server (*California v. Lipay Nation of Santa Ysabel*, 898 F.3d 960, 966-67 (9th Cir. 2018)). The State's plan to legalize mobile sports wagers to be placed from within Oneida's ten-county exclusivity zone to non-Oneida servers threatens to Materially Breach the Settlement Agreement. It jeopardizes more than \$75 million in annual payments that Oneida now makes to the State and the local municipalities that depends upon them.

The State can fulfill its obligations to Oneida by mandating platforms and operators to geo-fence Oneida's ten-county exclusivity zone to preclude placement of wagers from within the Oneida exclusivity zone to non-Oneida servers. While compliant with the Settlement Agreement, this outcome would deny the 1.2 million people who live in the ten-county exclusivity zone (6% of New York's population) the opportunity enjoyed by all other New Yorkers to participate in mobile sports wagering. And, of course, the carve-out of 1.2 million Central New Yorkers from mobile sports betting would cost the State approximately \$40.5 to \$52.5 million per year in annual tax revenues, assuming a minimum tax rate of 50%.

Central New York has enjoyed eight years of peace and harmony among Oneida, the State and local municipalities under the Settlement Agreement. Oneida settlement payments revenues have prevented county property tax increases. They have helped local municipalities balance their budgets, and they support social services, public safety, schools and public works. Neither Oneida nor the State, regional, county and local public officials and community leaders want to return to the era of disputes arising from the State's violation of its promises and agreements.

(b) 1993 Gaming Compact

In 1993, Oneida and the State entered into a Gaming Compact which authorizes Oneida to conduct casino games anywhere within the Oneida's 300,000-acre reservation. The Gaming Compact delineates a list of original games that were approved to be played at the Nation, and the Compact provides a specific procedure authorizing Oneida to add more games in the future. Section 15(b) of the Gaming Compact -- the so-called "Most Favored Nation" clause -- authorizes Oneida to adopt any new State gaming specifications for Class 3 games without any further approval by the State. Over the twenty-five years since the inception of the Gaming Compact, Oneida has adopted several of the State's gaming specifications pursuant to section 15(b)'s "Most Favored Nation" clause.

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The Oneida Gaming Compact does not require Oneida to share any gaming revenues with the State. Nor does the Gaming Compact have an expiration date, meaning the State has no opportunity to renegotiate these provisions upon the expiration of a term. Upon the State's legalization of mobile gaming and issuance of its governing regulations, Oneida is entitled to adopt the State's mobile gaming specifications into its Gaming Compact to offer statewide mobile gaming throughout New York, with no expiration date. No State approval will be required, and the Gaming Compact does not require any Oneida revenue sharing. Oneida would rely upon the State's position that wagers are deemed to occur at the server to accept wagers placed from customers throughout the State, outside of the Oneida reservation.

By virtue of the State's insistence that wagers placed within New York are deemed to be placed at the location of the server, the State would be estopped from challenging Oneida's ability to accept statewide wagers at its on-reservation server. If the State challenges Oneida's ability to accept statewide wagers at its on-reservation server, the State would undermine the constitutionality of its mobile sports betting program.

Oneida's operation of statewide mobile sports betting under its Gaming Compact without revenue sharing would provide Oneida with a massive advantage in competing against New York's licensed operators, who will be paying to the State at a presumptive 50% (or greater) tax rate.

Oneida Waivers to Protect the Integrity and Sustainability of the State's Tax and Competitive Structure for its Mobile Sports Betting Program

The State needs to deal with Oneida's rights and privileges to protect the integrity and sustainability of the State's carefully sculpted tax and competitive structure for generating State revenues under its mobile sports betting program. Oneida is prepared to do its part to help. Upon issuance of mobile sports betting operator licenses to Caesars and Wynn, Oneida would provide the State with the following Oneida Waivers that would avoid risks to the integrity and sustainability of the State's mobile sports betting program:

1. Oneida Waiver of its gaming exclusivity with respect to mobile sports betting for the term of the license.

Upon issuance of mobile sports betting operator licenses to Caesars and Wynn, Oneida would issue to the State a waiver of the Settlement Agreement's exclusivity provision with respect to mobile sports wagers placed within the Oneida exclusivity zone to non-Oneida servers located in the State. The waiver would remain in effect for so long as Caesars and Wynn retain their mobile sports betting operator licenses and remain party to the Oneida Revenue Sharing Agreement.

2. Oneida Waiver of its right to adopt the State's mobile sports betting gaming specifications into the Oneida Gaming Compact.

Upon issuance of mobile sports betting operator licenses to Caesars and Wynn, Oneida reservation, Oneida would waive its right to operate tax-free statewide mobile sports betting pursuant to the Oneida Gaming Compact from servers located on the Oneida reservation. The waiver would remain in effect for so long as Caesars and Wynn retain their mobile sports betting operator licenses and remain party to the Oneida Revenue Sharing Agreement.

Additional Oneida Commitments to Enhance Revenue to the State

In addition to its Revenue Sharing Agreement set forth in Section 6.7, the Oneida Indian Nation also will commit to reinvesting 100% of its revenues from its Revenue Sharing Agreement with Caesars and Wynn to funding programs and services, including public safety, health care, affordable housing, education and employment for Oneida's members and its non-Oneida employees in Central New York.

Saint Regis Mohawk Tribe:

The Akwesasne Mohawk Casino Resort represents an investment by the Saint Regis Mohawk Tribe in excess of \$230 million in construction and FF&E. And pre-pandemic, the Casino employed over 770 full and part time employees, with annual payroll exceeding \$31 million and annual supplier/vendor contracts exceeding \$37 million.

While the Oneida Indian Nation's geographic exclusivity rights broadly covers all Casino Gaming and Gaming Devices (as defined in its Compact), the Saint Regis Mohawk Tribe's geographic exclusivity under its Compact is limited to Slot Machines. Therefore, Oneida's posture and rights are different from Mohawk's. Nevertheless, the Mohawk Revenue Sharing Agreement includes a waiver during the term of that Agreement of the Tribe's right, privilege, and opportunity to own or operate a mobile sports wagering business that directly competes with the Operator parties to that Agreement.

6.7 REVENUE-SHARING AGREEMENTS

If applicable, an Applicant shall provide an executed copy of any agreement that provides for sharing of mobile sports wagering revenue with a Native American tribe or nation that is party to a compact with the State.

Executed copy of the Revenue Sharing Agreement with Oneida Indian Nation

See *Exhibit K – Oneida Revenue Sharing Agreement (NY) [Executed]* [CONFIDENTIAL]

6.8 PRICING MATRIX AND ACCOMPANYING ANALYSIS

Applicants shall complete and submit a pricing matrix, the form of which is set forth in Appendix B: Pricing Matrix. This matrix requires the Applicant to set forth the tax rate that an Applicant accepts under varying competitive scenarios of total Platform Providers and Operators. An Applicant must provide a tax rate that is fifty (50) percent or greater for its Preferred Scenario. However, if the Applicant's Preferred Scenario alone is less than the statutory minimum of two Platform Providers and four Operators, the Applicant must instead provide a tax rate that is fifty (50) percent or greater for such statutory minimum scenario. If an Applicant does not wish to participate in mobile sports wagering with particular levels of Platform Providers and Operators, the Applicant should enter a tax rate of 0 (zero). If a cell is left blank or unintelligible, such cell will be deemed to be a tax rate of 0 (zero).

In addition to the matrix, an Applicant shall submit an analysis using the Applicant's Preferred Scenario of Platform Providers and Operators. Such analysis shall contain the following:

- A. estimate of the total Mobile Sports Wagering Gross Gaming Revenue to be generated annually from all Platform Providers and Operator
- B. the Applicant's estimated share of the Mobile Sports Wagering Gross Gaming Revenue to be generated annually from all Platform Providers and Operators
- C. the Applicant's basis and methodology for estimates
- D. any other information that the Applicant believes relevant for the Committee to consider in maximizing sustainable, long-term revenue for the State

The Applicant also shall submit a similar analysis for each of the competitive scenarios for which the Applicant has responded on the Matrix. Given the slight variations between scenarios, an Applicant is permitted to band or group various scenarios together for purposes of such analysis.

See tax binder.

6.9 INTERNAL CONTROLS

The Applicant shall provide a draft of its proposed internal controls in regard to the operation of mobile sports wagering in this State and a draft of the proposed internal controls of each of the proposed Operators for the Applicant's Platform in this State.

Included with the RFA is a draft of the internal controls document for American Wagering, Inc. d/b/a Caesars Sportsbook operating mobile sports wagering in the State of New York.

See Exhibit L – NY Mobile Internal Controls DRAFT [CONFIDENTIAL]

Exhibit A – Master Architecture Diagram

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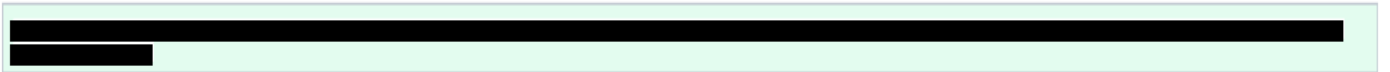


Exhibit B – Liberty Architectural Overview

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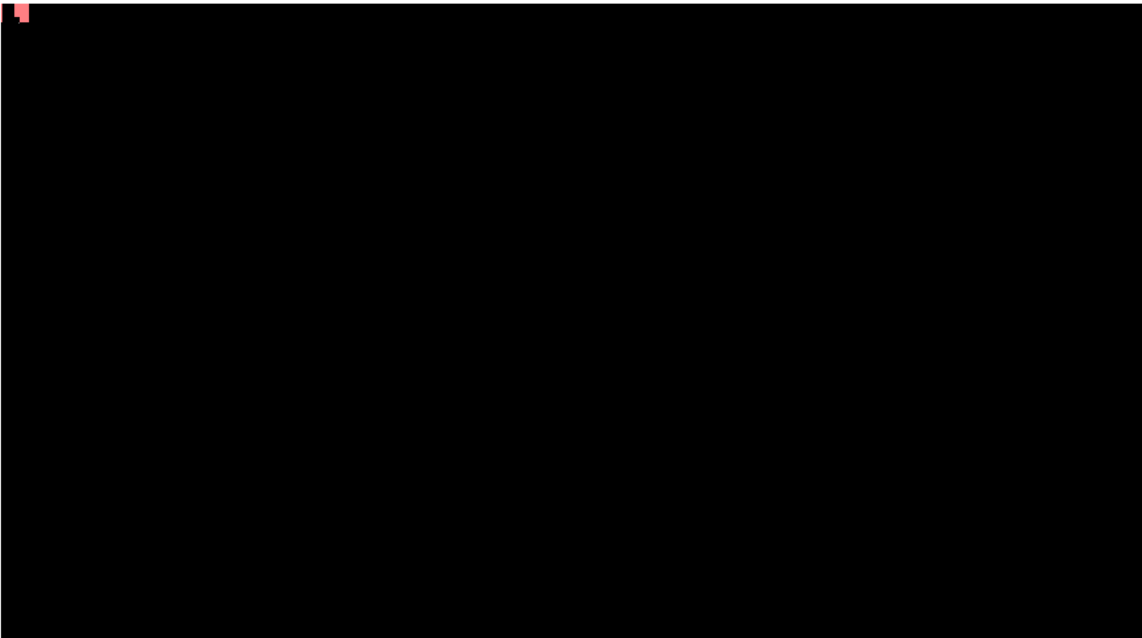
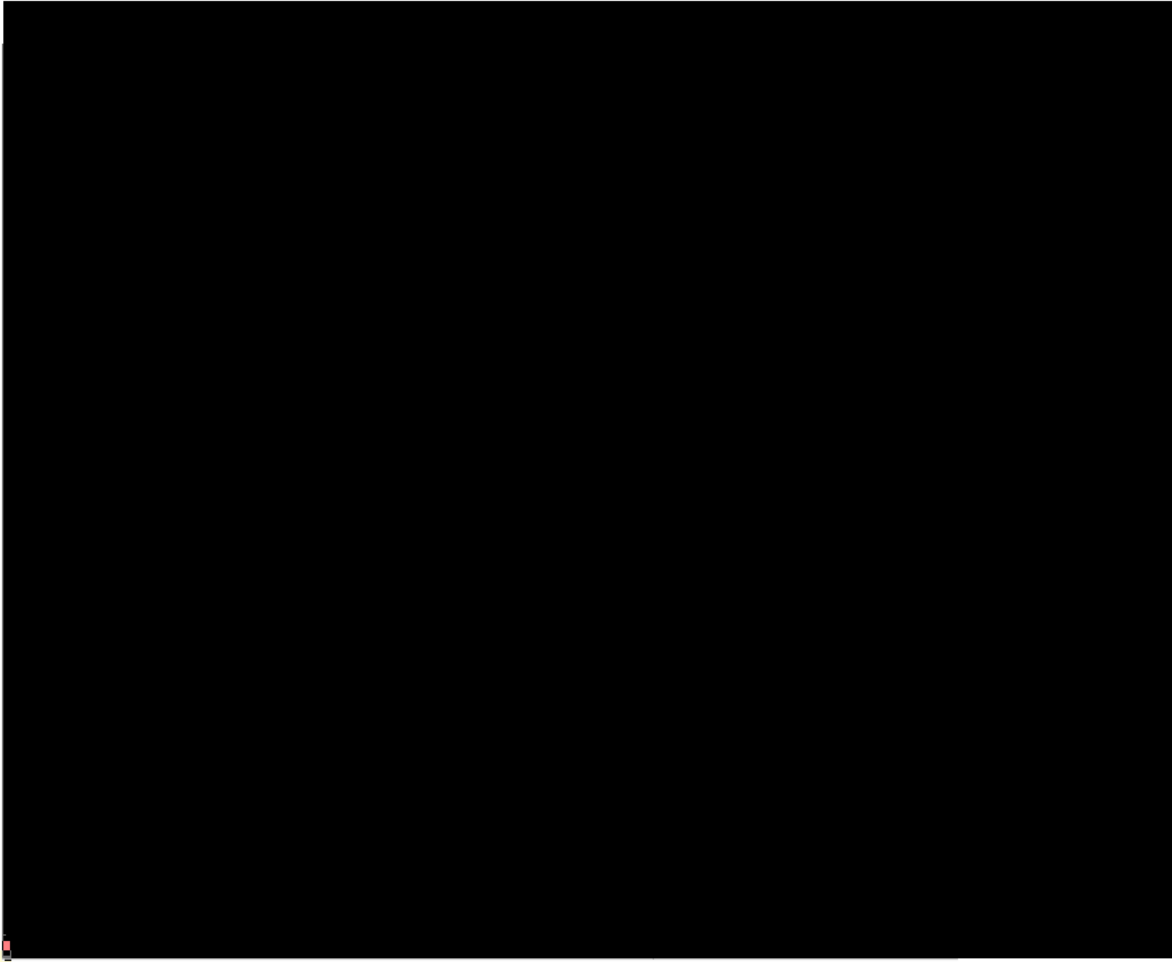


Exhibit C – Hardware Stack

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Exhibit D – Typical-In-State-Deployment-View

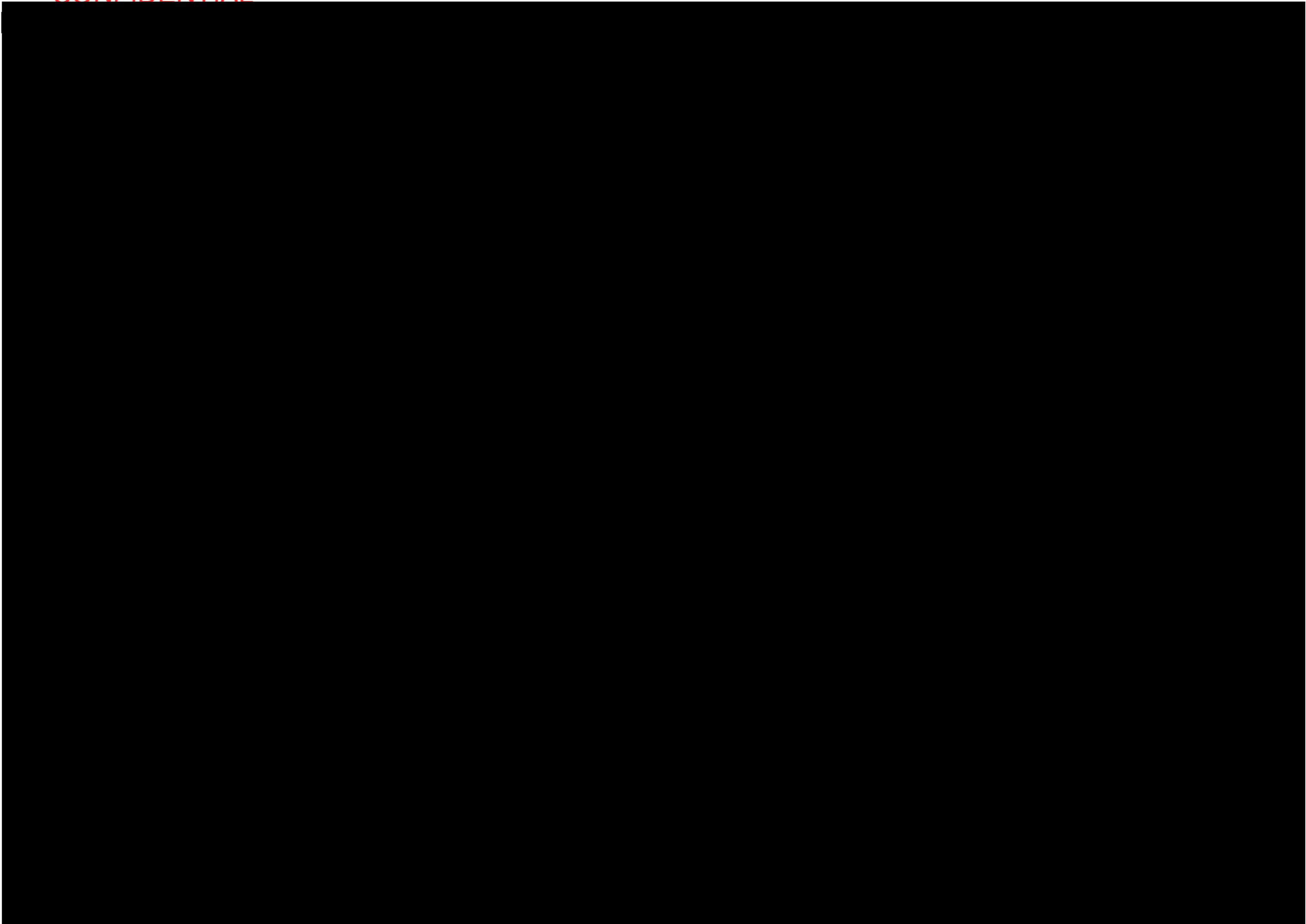


Exhibit E – Front End Overview

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Exhibit F – Back End Overview

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Exhibit G – Cryptographic Control Policy

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Exhibit H – Information Classification and Handling Policy

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Exhibit I – Cryptographic Standards

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Exhibit J – Compliance Report and Log Overview

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**Exhibit K – Oneida Revenue Sharing Agreement
(NY) [Executed]**

REVENUE SHARING AGREEMENT

This Revenue Sharing Agreement (this “**Agreement**”) is entered into as of August 2, 2021 (the “**Effective Date**”) by and between American Wagering, Inc., a Nevada corporation, and WSI US, LLC, a Nevada limited liability company (collectively, the “**Operator Parties**” and individually an “**Operator Party**”) and Oneida Indian Nation (“**Oneida**”), and together with the Operator Parties, the “**Parties**”).

WHEREAS, the State of New York has adopted a law permitting the conduct of mobile sports wagering throughout the State of New York (“**Mobile Sports Wagering**”); provided, that the sports wager is transmitted and accepted by equipment located at a licensed gaming facility in the State of New York (the “**NY Mobile Sports Betting Law**”).

WHEREAS, pursuant to the NY Mobile Sports Betting Law, the New York State Gaming Commission (“**NYGC**”) is conducting a competitive bidding process whereby, on July 9, 2021, it issued a request for applications for Mobile Sports Wagering Platform Providers (as defined in the NY Mobile Sports Betting Law) (“**RFA**”) and is seeking to award a minimum of two of the highest scoring Platform Providers with a license to engage in Mobile Sports Wagering based on a set of criteria established by the NY Mobile Sports Betting Law, as interpreted by the NYGC; provided, that there are at least four Mobile Sports Wagering Operators (as defined in the NY Mobile Sports Betting Law) operating under such Platform Providers in the State of New York.

WHEREAS, pursuant to the NY Mobile Sports Betting Law and the RFA, if an application submitted in response to the RFA (a “**Bid**”) includes an agreement to share Mobile Sports Wagering revenue with a compacted Native American tribe or nation, then the such applicant will receive additional points for its Bid when determining the highest scoring Platform Providers.

WHEREAS, each Operator Party and its affiliates are in the business, among other things, of operating Mobile Sports Wagering Platforms (as defined in the NY Mobile Sports Betting Law) and/or operating a sports pool through Mobile Sports Wagering Platforms.

WHEREAS, Oneida is a compacted Native American tribe or nation and each Operator Party agrees to share revenue with Oneida related its Mobile Sports Wagering as provided herein.

WHEREAS, the Parties believe that including Oneida in a joint Bid will significantly increase the likelihood that their single joint Bid will meet the criteria established by the NYGC and achieve a score high enough to result in their single joint Bid being selected an Award (as defined below).

NOW, THEREFORE, in consideration of the premises and mutual covenants in this Agreement, and for other good and valuable consideration, the receipt and sufficiency of which are hereby acknowledged, the Parties, intending to be legally bound, agree as follows:

AGREEMENT

1. Interpretation. In this Agreement, except to the extent otherwise provided or the context otherwise requires: (a) when a reference is made in this Agreement to a Section, Clause, Exhibit or Schedule, such reference is to a Clause or Section of, or an Exhibit or Schedule to, this Agreement unless otherwise indicated; (b) whenever the words “include,” “includes” or “including” are used in this Agreement, they are deemed to be followed by the words “without being limited to” and the words “include,” “includes,” “including,” “in particular” or any similar expression shall be construed as illustrative and shall not limit the sense of the words preceding those terms; (c) the words “hereof,” “herein” and “hereunder” and words of similar import, when used in this Agreement, refer to this Agreement as a whole and not to any particular provision of this Agreement; (d) all terms defined in this Agreement have the defined meanings when used in any document made or delivered pursuant hereto, unless otherwise defined therein; (e) the definitions contained in this Agreement are applicable to the singular as well as the plural forms of such terms; (f) any pronoun used in this Agreement shall include the corresponding masculine, feminine and neuter forms; (g) any notice under this Agreement shall be in writing and in English; (h) any reference to “days” means “calendar days” unless otherwise specified; (i) if a notice is to be given on a specified day, unless otherwise specifically provided herein, it must be given prior to 5:00 p.m., New York, New York time; (j) references to a person or entity are also to its successors and permitted assigns; (k) the use of “or” is not intended to be exclusive unless expressly indicated otherwise; (l) any references to “\$” and “dollars” is to the lawful money of the USA; (m) a reference to “unreasonably withheld” means “unreasonably withheld, conditioned or delayed”, and (n) unless otherwise expressly provided herein, any agreement, instrument, statute, rule or regulation defined or referred to herein or in any agreement or instrument defined or referred to herein (including this Agreement) means such agreement, instrument, statute, rule or regulation as from time to time amended, modified or supplemented, including (in the case of agreements or instruments) by waiver or consent and (in the case of statutes, rules and regulations) by succession of comparable successor statutes, rules and regulations.
2. Recitals. The Recitals set forth above are true and correct and are hereby incorporated into this Agreement as if set forth at length herein.
4. Single Joint Bid. The Parties agree to jointly submit a Bid (a “**Single Joint Bid**”). In the event the Single Joint Bid is selected as a winning Bid and a license to operate Mobile Sports Wagering is awarded in connection therewith (an “**Award**”), then each Operator Party agrees to obtain and maintain, at their sole cost and expense, all the necessary licenses to become a Mobile Sports Wagering Licensee (as defined in the NY Mobile Sports Betting Law) and conduct Mobile Sports Wagering in a manner as required by applicable laws, statutes, regulations, codes, rules and ordinances (the “**Mobile Sports Wagering License**”).
5. Upfront Fee and Revenue Share.
 - a. In the event the Single Joint Bid achieves an Award and in consideration for entering this Agreement, the Operator Parties shall pay Oneida a non-refundable fee in the amount of [REDACTED] (the “**Upfront Fee**”) within three (3) Business Days after the Award in immediately available funds. Each Operator Party agrees to pay [REDACTED] when due and owing.

b. Additionally, each Operator Party, other than an Additional Platform Provider, agrees that during each Operating Year (as defined below) during the Term it will pay to Oneida an amount equal to █% of the Net Gaming Revenue (as defined below) of such Operator Party (the "**Oneida Revenue Share**"). The Operator Parties shall pay the Oneida Revenue Share on a quarterly basis in arrears within thirty (30) days of the end of each calendar quarter.

(i) To the extent the aggregate Oneida Revenue Share received by Oneida from all the Operator Parties during any Operating Year *does not* exceed █ (the "**Annual Revenue Guaranty**"), then within 30 days of the end of the applicable Operating Year, the Operator Parties shall pay Oneida

█ (the "**Top Off Amount**").

(ii) █

(1) █

¹ █

[REDACTED]

- (iii) For purposes of this Section 4(b):
 - (1) “**Gross Gaming Revenue**” means the total of all sums wagered by players less the total of all sums actually paid out as winnings to players.
 - (2) “**Net Gaming Revenue**” means the Gross Gaming Revenue derived from such Operator Party’s Mobile Sports Wagering as reduced by and in each case: (1) government taxes levied on such Gross Gaming Revenue or associated handle, including the federal excise tax (all such taxes to be deducted as a pass-through without mark-up of any kind), (2) payment processing, charge-backs and associated costs and fees (including credit card processing fees), and out-of-pocket costs associated with checks carried out in order to attempt to verify the age, identity, or location of a potential player in accordance with laws, including whether such potential player is excluded from play (including self-exclusion) associated with such Mobile Sports Wagering, (3) player bonuses and free-play awarded or redeemed associated with such Mobile Sports Wagering, and (4) any integrity fees payable to sports leagues by such Operator Party as required by the NY Mobile Sports Betting Law or regulations of the NYGC or other sports data fees.
 - (3) “**Operating Year**” means the 12 month period beginning on the date the first Operator Party offers its Mobile Sports Wagering to potential players pursuant to NY Mobile Sports Betting Law and ending 12 months thereafter or, in the case of the last Operating Year, on the termination or expiration of this Agreement.

6. Oneida Waivers. Oneida agrees to exclusively support the Operator Parties’ Bid. If the Single Joint Bid achieves an Award and NYSGC issues a Mobile Sports Wagering License to the Operator Parties to operate Mobile Sports Wagering within New York State, Oneida agrees to:

- a. waive its exclusive geographic right to offer and conduct mobile sports wagering pursuant to Section IV of the Settlement Agreement between the Oneida Indian Nation, the State of New York, the County of Madison and the County of Oneida, dated May 16, 2013, for the Term of this Agreement; and
- b. waive its right to, and agrees not to, conduct mobile sports wagering pursuant to (i) the Indian Gaming Regulatory Act of 1988, Public Law 100-497, 25 U.S.C. § 2701 et seq. and the regulations promulgated thereunder, (ii) its 1993 Nation-State Gaming Compact with the State of New York (approved by U.S. Secretary of Interior in 1993 and ratified by the New York State Legislature in 2013) or (iii) any subsequent or separately issued Mobile Sports Wagering License during the Term of this Agreement.

The above waivers are limited in applicability solely to Oneida's operation of mobile sports wagering and shall not extend to any other operation or activity of Oneida. Further, Oneida acknowledges that the Bid will provide a representation that, if the Single Joint Bid achieves an Award, Oneida will provide the above waivers.

7. Quarterly Statement; Oneida Audit Right.

- a. Within 30 business days of the end of each quarter, each Operator Party shall provide Oneida with a quarterly operating statement relating to their Mobile Sports Wagering (the "**Quarterly Statement**"). The Quarterly Statement shall be provided electronically. Each Quarterly Statement shall report (a) the Operating Party's calculation of Gross Gaming Revenue and Net Gaming Revenue for the immediately preceding month and (b) Oneida Revenue Share for the immediately preceding month. Each Quarterly Statement will include all necessary detail and supporting documentation reasonably necessary for Oneida to confirm the calculation set forth in the Quarterly Statement.
- b. The Operator Parties will keep and maintain accurate books of account and records covering all transactions relating to the Oneida Revenue Share. Oneida is entitled, at its sole cost and expense, to (a) inspect such books and records up to two times each calendar year, upon at least 15 days' prior written notice to the Operator Party, or at any time during a calendar year for a commercially reasonable purpose related to this Agreement, by sending an authorized representative, agent, attorney or accountant to the then current business address of the Operator Party where such books and records are maintained; and (b) to make or cause such authorized representative, agent, attorney or accountant to make copies and summaries of such books and records solely for use in connection with such inspection (such books and records, and copies and summaries, will be deemed Confidential Information). If such an audit reveals that Oneida was underpaid, the applicable Operator Party(ies) shall promptly pay the amount of such underpayment to Oneida.

8. Confidentiality.

- a. Each Party acknowledges that it may receive certain Confidential Information of another Party hereunder, and that such Confidential Information is proprietary to another Party and may include trade secrets. Accordingly, during the Term and thereafter: (i) no Party shall use the Confidential Information of the other Party in any other business or capacity, other than as necessary to perform or exercise a Party's right, under this Agreement; (ii) each Party shall maintain the confidentiality of, and shall not disclose to any other Person (including the media), any Confidential Information of another Party or the terms of this Agreement, except to its shareholders, partners, trustees, beneficiaries, directors, officers, employees, agents, legal counsel, accountants and existing and potential lenders and potential purchasers, but only on a "need to know" basis in connection with the rights and obligations set forth in this Agreement and subject to customary confidentiality protections; (iii) no Party shall make unauthorized copies of any portion of the another Party's Confidential Information disclosed in written, electronic or other form; and (iv) each Party shall make every effort to ensure that none of its shareholders, partners, members, trustees, beneficiaries, directors, officers, employees, agents, representatives and potential purchasers use, disclose or copy any Confidential Information of another Party, disclose any terms of this Agreement or take any other actions that are otherwise prohibited under this Section 8. Notwithstanding the foregoing, the restrictions on the use and disclosure of Confidential Information shall not apply (1) to information or techniques which are or become generally known to the public (other than through any breach of any obligation with respect to confidentiality); (2) to the extent such disclosure is required under applicable laws; (3) to information known to a Party before disclosure thereof by another Party or disclosed to such Party by a Third Party not subject to confidentiality obligations to another Party or developed by such Party without use of another Party's Confidential Information; or (4) for purposes of compliance with or enforcement of this Agreement; *provided* that, with respect to disclosures pursuant to clause (2) above, such Party agrees to promptly notify the other Part(ies) of the existence, terms and circumstances surrounding such disclosure unless prohibited by law, and exercise its reasonable efforts to obtain an order or other reliable assurance that confidential treatment will be accorded to such Confidential Information, and if such order or assurance is not obtained, such Party shall be permitted to disclose only such portion of the other Party's Confidential Information that it is advised by opinion of counsel is required to be disclosed.
- b. As requested by the Disclosing Party, upon expiration or any termination of this Agreement or receipt of the Award, the Receiving Party shall, and shall cause its permitted Representatives to, (i) return or destroy, as the Disclosing Party may direct, and in the manner reasonably directed by the Disclosing Party, all material in any medium that contains, refers to, or relates to the Disclosing Party's Confidential Information, and (ii) retain no copies other than copies solely to the extent, if any, in connection with any record retention policies or required by applicable Law; provided, however, that no Party will be obligated to erase Confidential Information contained in an archived computer system backup made

in accordance with such Party's security or disaster recovery procedures, provided that such archived copy will (y) eventually be erased or destroyed in the ordinary course of such Party's data processing procedures and (z) will remain fully subject to the obligations of confidentiality and security stated herein.

- c. In the event of any actual or suspected misuse, disclosure or loss of, or inability to account for, any Confidential Information of the Disclosing Party by the Receiving Party or its permitted Representatives, the Receiving Party promptly shall (i) (and in any event within five business days) notify the Disclosing Party upon becoming aware thereof; (ii) furnish to the Disclosing Party full details of the unauthorized possession, use or knowledge, or attempt thereof, and use reasonable efforts to assist the Disclosing Party in investigating or preventing the reoccurrence of any unauthorized possession, use, or knowledge, or attempt thereof, of Confidential Information of the Disclosing Party; (iii) take such actions as may be necessary or reasonably requested by the Disclosing Party to minimize the violation; and (iv) cooperate and cause its permitted Representatives to cooperate in all reasonable respects with the Disclosing Party to minimize the violation and any damage resulting therefrom.
- d. For purposes of this Section 8:

“Confidential Information” means the terms of this Agreement and any confidential or proprietary information in any form emanating, directly or indirectly, from Disclosing Party, concerning or relating to Disclosing Party or the business operations of such entity, including proprietary technology and/or business plans, which information has been disclosed to the Receiving Party or its affiliates or agents, whether orally or in writing, whether or not it is designated as confidential. However, notwithstanding the foregoing, Confidential Information does not include any information that (i) is or becomes generally known to the public without breach of any obligation owed to the Disclosing Party, (ii) was known to the Receiving Party prior to its disclosure by the Disclosing Party without breach of any obligation owed to the Disclosing Party, (iii) is received from a unaffiliated third party who rightfully possess the information without confidential or proprietary restrictions, or (iv) was independently developed by the Receiving Party.

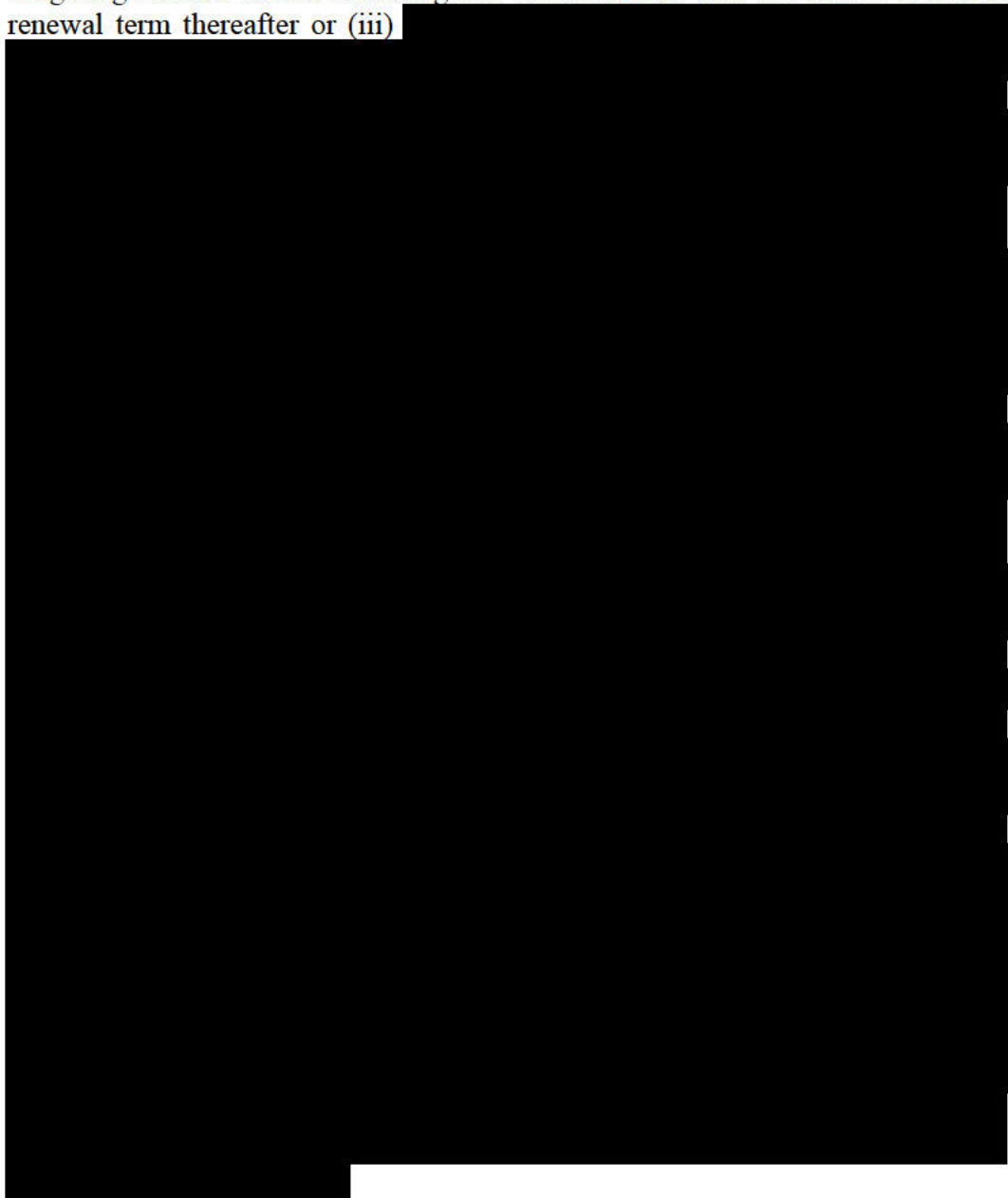
(1) **“Disclosing Party”** means a Party that discloses its or its affiliates' Confidential Information to the other Party or its affiliates. In the case of Confidential Information described in clause (ii) of the definition thereof, all the Parties shall be deemed to be the Disclosing Party.

(2) **“Receiving Party”** means a Party or its affiliates that receives Confidential Information from to the Disclosing Party or its affiliates. In the case of Confidential Information described in clause (ii) of the definition thereof, all the Parties shall be deemed to be the Receiving Party.

- e. This Section 8 shall survive the expiration or termination of this Agreement for any reason.

9. Term; Termination.

- a. This Agreement, unless sooner terminated pursuant to this Section 9, shall continue until the earlier of (i) the date the NYGC selects the winning Bids and the Single Joint Bid does not receive an Award, (ii) the initial term of the Mobile Sports Wagering License issued following and in connection with the Award and each renewal term thereafter or (iii)



- b. As a holder of privileged gaming licenses, each Party and its affiliates are required to adhere to strict laws and regulations regarding vendor and other business relationships or associations. If at any time during the Term, an Operator Party's (the "**Notifying Party**") compliance committee determines, in good faith based on verifiable, documented facts after reasonable consideration of available information and after receiving a written advice of qualified outside gaming counsel that is generally recognized as expert in gaming law in the applicable jurisdiction, that its association with another Party (the "**Unsuitable Party**") would violate any statutes and/or governmental regulations regarding prohibited relationships with gaming companies, or jeopardize any existing, proposed or pending gaming licensing applications of such Notifying Party or any of its affiliates (a "**Gaming Issue**"), it shall notify all the other Parties (including the Unsuitable Party).
- c. If the Unsuitable Party the other Operator Party, then at the request of the Notifying Party, the Parties will work in good faith to promptly resolve such Gaming Issue and, if the Notifying Party reasonably determines that it is unlikely that such Gaming Issue will be timely resolved, it can request that the Parties split this Agreement into two agreements, whereby one is applicable to the Notifying Party and Oneida and the other is applicable to all the Operating Parties (other than the Notifying Party) and Oneida. In such event, each such agreement will be substantially identical to this Agreement, but (1) shall only be applicable to the Operator Party counterparty thereto, (2) the Annual Revenue Guaranty in such agreement shall be equal to 50% of the Annual Revenue Guaranty under this Agreement and (3) such agreement shall not include any reimbursement to an Over Funded Party.
- d. If the Unsuitable Party is Oneida, then such Parties shall, in good faith, cooperate and work in good faith to resolve such Gaming Issue, in accordance with the following procedures:
- (i) the Notifying Party shall, in good faith, use commercially reasonable efforts to facilitate a meeting among it, Oneida and any applicable gaming regulatory authority for the purpose of remedying, or determining how Oneida could address and remedy, the concerns giving rise to such Gaming Issue.
 - (ii) the Notifying Party and Oneida shall cooperate in good faith to attempt to address the concerns giving rise to such Gaming Issue, including, if applicable, mutually agreeing to restructure the Agreement or mutually agreeing for the Notifying Party to make any payments hereunder to another person or trust permitted by applicable laws.
 - (iii) if (1) after complying with subsections (i) and (ii) above, the Notifying Party reasonably determines that it is unlikely that such Gaming Issue will be timely resolved and (2) the Notifying Party, acting in good faith through its board of directors (or equivalent governing body), a committee thereof or its delegates, makes a determination that the applicable Gaming Issue continues to be problematic and may result in an investigation or adversary

proceeding which challenges the Notifying Party's suitability or good standing (including any potential loss of, threatened loss of, the imposition of materially burdensome terms and conditions on any gaming approvals of the Notifying Party or any its affiliates, or other disciplinary action which may cause significant harm to the reputation and standing of any such person), then the Notifying Party may provide written notice to the other Parties of its termination of this Agreement as it relates to such Notifying Party.

- e. To the extent this Agreement terminates with respect to any Operator Party, the Annual Revenue Guaranty shall be reduced by 50%; provided, the Parties acknowledge if an Operator Party ceases operating Mobile Sports Wagering, but is not entitled to terminate this Agreement, it shall continue to be subject to this Agreement and the Shortfall Party Top Off Payment or the Shortfall Party True Up Payment, as applicable, until such termination.

10. General Terms.

- a. Representations. Each Party represents and warrants that: (i) it is not prohibited by any prior agreement with any third party from entering into this Agreement and/or fully performing its obligations under this Agreement; (ii) it is validly existing and in good standing under the laws of the jurisdiction of its incorporation or organization; and (iii) this Agreement is a valid, legal and binding obligation enforceable in accordance with its terms.
- b. Sovereign Immunity Waiver. Oneida hereby expressly and irrevocably waives its sovereign immunity (and any defense based thereon) from any suit, action or proceeding for the limited purpose of enforcement of this Agreement. In conjunction with Oneida's limited waiver of sovereign immunity, the Parties agree that any and all controversies, claims, or disputes with anyone (including the other Party or any employee, officer, director, or shareholder of the other Party in his, her, or its capacity as such or otherwise) arising out of, relating to, or resulting from this Agreement, including any question regarding its existence, validity, or termination, as well as any challenge to a tribunal's jurisdiction, shall be resolved exclusively pursuant to the dispute resolution provisions of Section 10(e). The limited waiver and consent described in this Agreement inures solely to the benefit of Operator Parties. Nothing contained in this limited waiver shall be construed to confer any benefit, tangible or intangible, on any person or entity not a Party to this Agreement or as a waiver with respect to any such third person or entity.

Oneida expressly, irrevocably and unconditionally waives any application of the doctrine of exhaustion of tribal remedies, abstention or any similar rule of comity with respect to the Nation, or any Nation courts and agrees that it will not present any affirmative defense based on any such doctrine.


Oneida understands that adoption of an enforceable waiver of sovereign immunity is a material inducement to the Operator Parties' execution of this Agreement and is a condition precedent to any of the respective obligations of the Parties under this Agreement.

- c. Entire Agreement. This Agreement constitutes the entire agreement between the Parties with respect to its subject matter and constitutes and supersedes all prior agreements, representations and understandings of the Parties, written or oral. This Agreement may not be modified, and no provision herein shall be waived, except by a written instrument signed by the Parties.
- d. Relationship of the Parties. The relationship of the Parties under this Agreement is that of independent contractors. Each Party acknowledges that it is solely responsible for its actions or inactions, and that nothing in this Agreement will be construed to create an agency or employment relationship between the Parties. No Party is authorized to enter into contracts or agreements on behalf of any other Party or to otherwise create obligations of a Party to third parties except as required for purposes of submitting the Single Joint Bid. No Party nor any of its employees are employees of any other Party for any purpose pursuant to this Agreement.
- e. Choice of Law: Forum: Costs. This Agreement and all questions and disputes in connection herewith shall be deemed to have been made and shall in all respects be governed by and construed in accordance with the laws of the State of New York without giving effect to any conflicts or choice of law principles. Subject to Section 10(b) each of the Parties (i) agrees that any legal action or proceeding arising out of this Agreement shall be brought exclusively in the state and federal courts of the State of New York (the "Permitted Court"), (ii) irrevocably submits to the exclusive jurisdiction of the Permitted Court for purposes of enforcing this Agreement, and (iii) waives and agrees not to assert (by way of motion, as a defense or otherwise) in any suit, action, proceeding or dispute properly brought or maintained before the Permitted Court in accordance with this Agreement, any claim that such Party is not subject to the personal jurisdiction of the Permitted Court or that this Agreement or the subject matter hereof may not be enforced in or by the Permitted Court. The prevailing Party in any action or proceeding related to the interpretation or enforcement of this Agreement shall be entitled to recover its expenses (including reasonable attorneys' fees) incurred in connection with such action or proceeding and any appeal.
- f. Press Release. No Party shall use the name or logo of any other Party or any of its affiliates nor the fact that it is doing business with another Party, in any publicity, press release, advertising or similar activity without prior written consent from such Party.
- g. Counterparts. This Agreement is effective on the Effective Date. This Agreement may be executed in counterparts, including by facsimile or PDF, each of which shall be deemed an original and all of which together shall constitute a single Agreement.


- h. Assignment: Third Party Beneficiaries. This Agreement will bind and inure to the benefit of each Party's permitted successors and assigns. No Party shall assign this Agreement without all the other Parties' prior written consent; provided, however, that following receipt of the Award and except as set forth below, each Operator Party shall have the right to assign this Agreement, without prior written consent, (i) to an affiliate or (ii) by reason of its merger, acquisition or consolidation, or to an acquirer of all or substantially all of its equity or assets, provided that such assignee has the ability to perform the obligations of the assigning Party. Notwithstanding the foregoing, except pursuant to subsection (ii), no assignment shall relieve the assigning Party of its obligations under this Agreement and any and all assignments shall be conditioned upon (A) the proposed assignee expressly assuming in writing all obligations of the assigning Party under the Agreement (B) advance written notice is provided to the other Parties, and (C) confirmation that such assignment will not result in any impact on the other Parties' continuous, uninterrupted right to conduct Mobile Sports Wagering as contemplated by the Award. Any attempt to assign this Agreement in violation of this Section 9(h) will be null and void.
- i. Injunctive Relief. The Parties recognize that a breach of this Agreement by any Party would cause irreparable damage for which recovery of money damages would be inadequate. Accordingly, each Party (other than an Additional Platform Provider) will be entitled to injunctive relief to protect its rights under this Agreement in addition to any other equitable or legal relief.

IN WITNESS WHEREOF, the Parties have executed this Agreement as of the Effective Date.

American Wagering, Inc., a Nevada corporation

By: 
 Name: Eric Hession
 Title: Co-President, Caesars Sports

WSI US, LLC, a Nevada limited liability company

By: 
 Name: CRAIG S. BILLINGS
 Title: CEO, WIL

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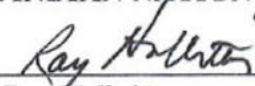
By: 
 Name: Ray Halbritter
 Title: Nation Representative

Exhibit L – NY Mobile Internal Controls DRAFT

Internal Control Requirement §5330.8 (b) thru (f)	Relevant Page Number within Section
(b) System requirements. Internal controls for system requirements shall address:	
(1) user access controls;	█
(2) a description of segregation of duties;	█
(3) procedures for identifying and reporting fraud and suspicious conduct or activity;	█
(4) procedures to prevent sports wagering by patrons prohibited from sports wagering;	█
(5) a description of all integrated third-party systems;	██████████
(6) procedures on how to maintain the integrity of sports wagering platforms, authorized sports bettor's data and sports wagering data storage in the case of a system failure;	██████████
(7) description of the secure method to control remote access to the sports wagering platform using firewalls or other protections and maintaining secure logs;	█
(8) all data sources used in sports wager determination. Official data from a sports governing body shall be used to determine all sports wagers, unless a skin demonstrates to the satisfaction of the commission that sports wagers for such sports wager type may be determined reliably, accurately and timely by an alternative data source. See Racing, Pari-Mutuel Wagering and Breeding Law section 1367(14);	██████████
(9) the method in which the mobile sports wagering licensee shall implement the statewide voluntary self-exclusion database and other prohibited sports bettors into its system; and	█
(10) where the mobile sports wagering licensee plans to list, on a website or mobile application, information concerning assistance for compulsive play in New York State, including a toll-free number directing callers to reputable resources, free of charge to the caller.	██████████
(c) Authorized sports bettor account requirements. Internal controls for authorized sports bettor account requirements shall address:	
(1) controls in place to limit each authorized sports bettor to one active account per skin, as required by Racing, Pari-Mutuel Wagering and Breeding Law section 1367- a(4)(a)(i);	█
(2) the multi-factor authentication method to be used;	█
(3) the mechanism for an authorized sports bettor to establish daily, weekly or monthly deposit limits, as required by Racing, Pari-Mutuel Wagering and Breeding Law section 1367-a(4)(a)(xii);	█
(4) controls in place to prohibit anyone under the age of 21 from participating in mobile sports wagering;	██████████

(5) the mechanism, if any, the platform provider or skin will use to create a wallet to be used by authorized sports bettors across multiple skins associated with such platform provider;	■
(6) the systems and procedures in place to maintain the security of authorized sports bettors' accounts, including the encryption of personally identifiable information and biometric data, Social Security number, account personal identification number and/or password and methods of account funding;	■
(7) how the mobile sports wagering licensee intends to meet all requirements set forth in section 5330.4 of this Part;	■
(8) procedures for issuing a form W-2G, if such thresholds are met;	■
(9) procedures for authorized sports bettors to obtain a year-end win-loss statement;	■
(10) the mechanism for allowing an authorized sports bettor to close an account;	■
(11) a procedure for when an authorized sports bettor's lifetime deposits reach \$2,500, and every year thereafter, for such bettors to acknowledge the bettor has met the deposit threshold and may elect to establish limits or close such account and that the bettor has received disclosures that include problem gaming resources, as required by Racing, Pari-Mutuel Wagering and Breeding Law section 1367- a(4)(a)(xiii); and	■
(12) how a dormant account is defined and what the process is for reconciliation of such accounts	■
(d) Prevention of circumvention of sports wagering amount acknowledgments. A skin shall provide the acknowledgment set forth in paragraph (11) of subdivision (c) of this section whenever such skin knows or should know that an authorized sports bettor has taken or is attempting to take action designed to circumvent the monetary threshold set forth in such paragraph.	■
(e) Operational requirements. Internal controls for operational requirements shall address:	
(1) a description of how the skin intends to segregate sports bettors' funds from operating funds;	■
(2) procedures to ensure no sports wagering shall be based on a prohibited sports event;	■
(3) a description of anti-money laundering compliance standards;	■
(4) a description of the monitoring system that identifies and reports suspected structured sports wagers and unusual or suspicious wagering activity;	■
(5) procedures in place to ensure no sports wagering shall be based on a prohibited sports event;	■
(6) procedures for the skin reconciling gross gaming revenue and remitting such amount to the platform provider for the payment of taxes and fees to the commission; and	■
(7) in the event of changes and upgrades to the mobile sports wagering server or other hardware and software used to execute mobile sports wagering, procedures the mobile sports wagering licensee intends to follow in order to receive approval from the commission, including recertification of such sports wagering components.	■

<p>(f) Geolocation requirement. Geolocation software used by mobile sports wagering licensees shall be approved by a licensed independent testing laboratory, including applicable field testing, before the software is deployed in this State. Internal controls for geolocation requirements shall address:</p>	
<p>(1) how the licensee shall ensure that authorized sports bettors shall be physically located within the State of New York when engaging in mobile sports wagering;</p>	<p>██████</p>
<p>(2) which geolocation system will be used to reasonably detect the physical location of an authorized sports bettor attempting to place a sports wager with the skin and block unauthorized attempts to access the licensee’s platform throughout the duration of the wagering session;</p>	<p>██████</p>
<p>(3) how the geolocation system will detect any mechanisms a bettor may use to circumvent the requirement that the bettor be physically located within the State of New York;</p>	<p>██████</p>
<p>(4) how the geolocation system ensures the integrity of the bettor’s account and the bettor’s device by blocking sports wagers from devices that indicate tampering;</p>	<p>██████</p>
<p>(5) how the skin will discover and update the internet protocol address of the bettor if such changes during a session and how physical location would then be detected;</p>	<p>██████</p>
<p>(6) how the system shall block any attempt to make a sports wager the geolocation software determines is being attempted from a physical location outside of the State of New York; how, in such event, the system shall log any identifying information relating to such attempt; and how such information shall be made available to the commission upon request;</p>	<p>██████</p>
<p>(7) how the geolocation system shall alert the mobile sports wagering licensee of potential risks and fraudulent activity and grant the licensee and the commission access to real-time data feeds of geofencing feeds and potential risks; and</p>	<p>██████</p>
<p>(8) how the skin shall ensure that a mobile sports wagering vendor license is obtained by any geolocation vendor</p>	<p>██████</p>

CAESARS. SPORTSBOOK

Caesars Sportsbook New York

Sports Book Internal Controls for Internet and Mobile

Contents

[Redacted Table-Of-Contents]

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Document Purpose

This document is the Internal Controls draft document for American Wagering, Inc. d/b/a Caesars Sportsbook (“Caesars”) operating in the State of New York. The internal controls specified within are in draft form only and will be revised as necessary.

The document includes:

- Compliance with the various regulations governing a digital sports book
- The internal controls applied in the operation of the system

The document is intended for use by:

- The appropriate regulatory agencies
- Employees of The Company operating the system

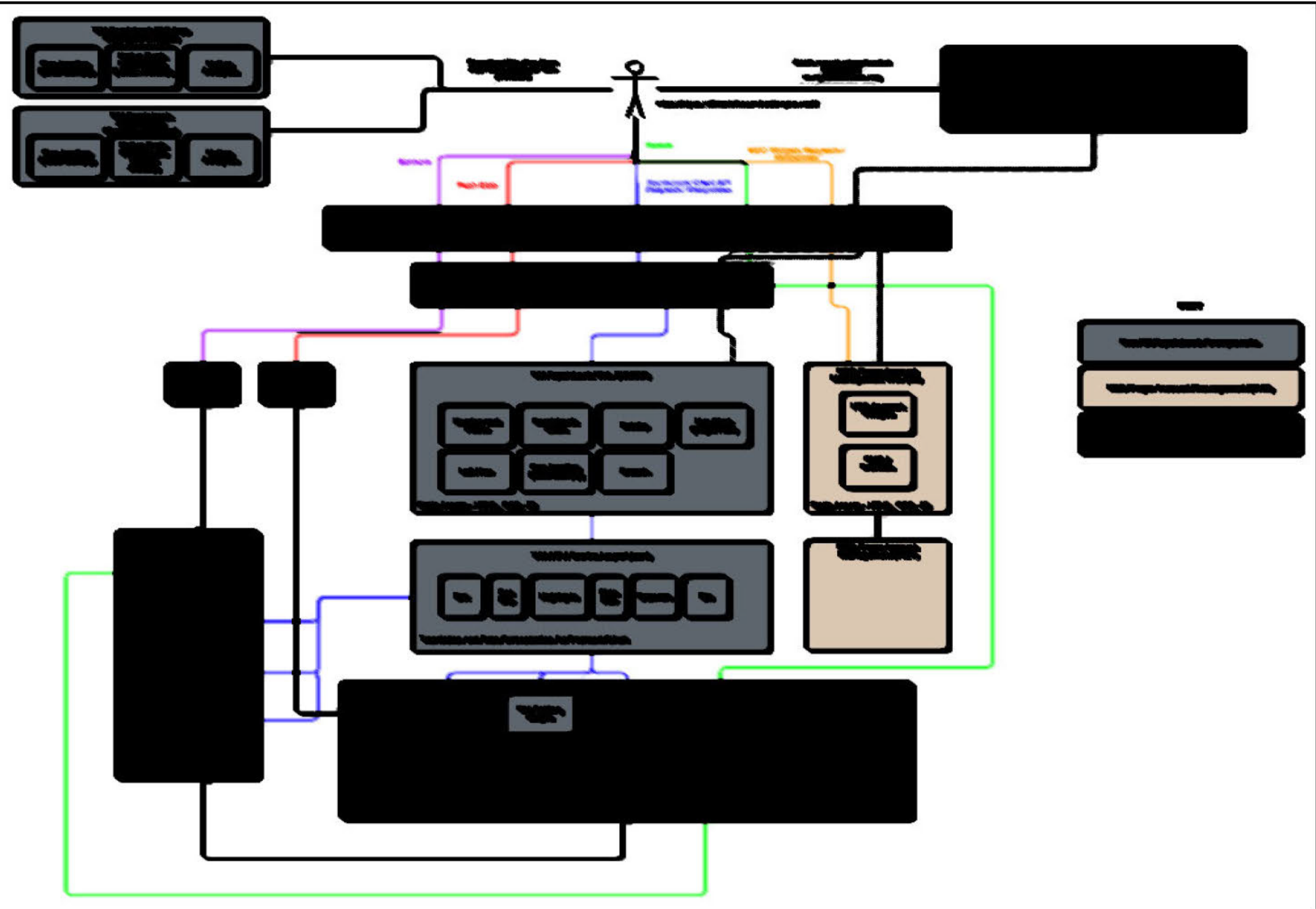
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INTERNAL CONTROLS FOR INTERNET & MOBILE



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Emergency Software Deployments

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Remote Access

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System Recovery

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System Access

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Description

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Authentication

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Authorization

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Segregation of Trading Duties

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Manual Event/Match Override of Status and Publish State

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Biasing of Prices within a Market

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Risk Management

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Staffing Model

The Company has two offices in New Jersey supporting the Digital business:

- 101 Hudson Street, Jersey City, New Jersey, 07302. This office primarily houses the Digital

Operations and Marketing teams.

- 3 Executive Campus | Cherry Hill, NJ | 08002 . This office primarily houses the Customer Support team serving NY Digital patrons through Voice, Email and Live Chat.

Account Registration

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Verification at Registration

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Manual KYC Process

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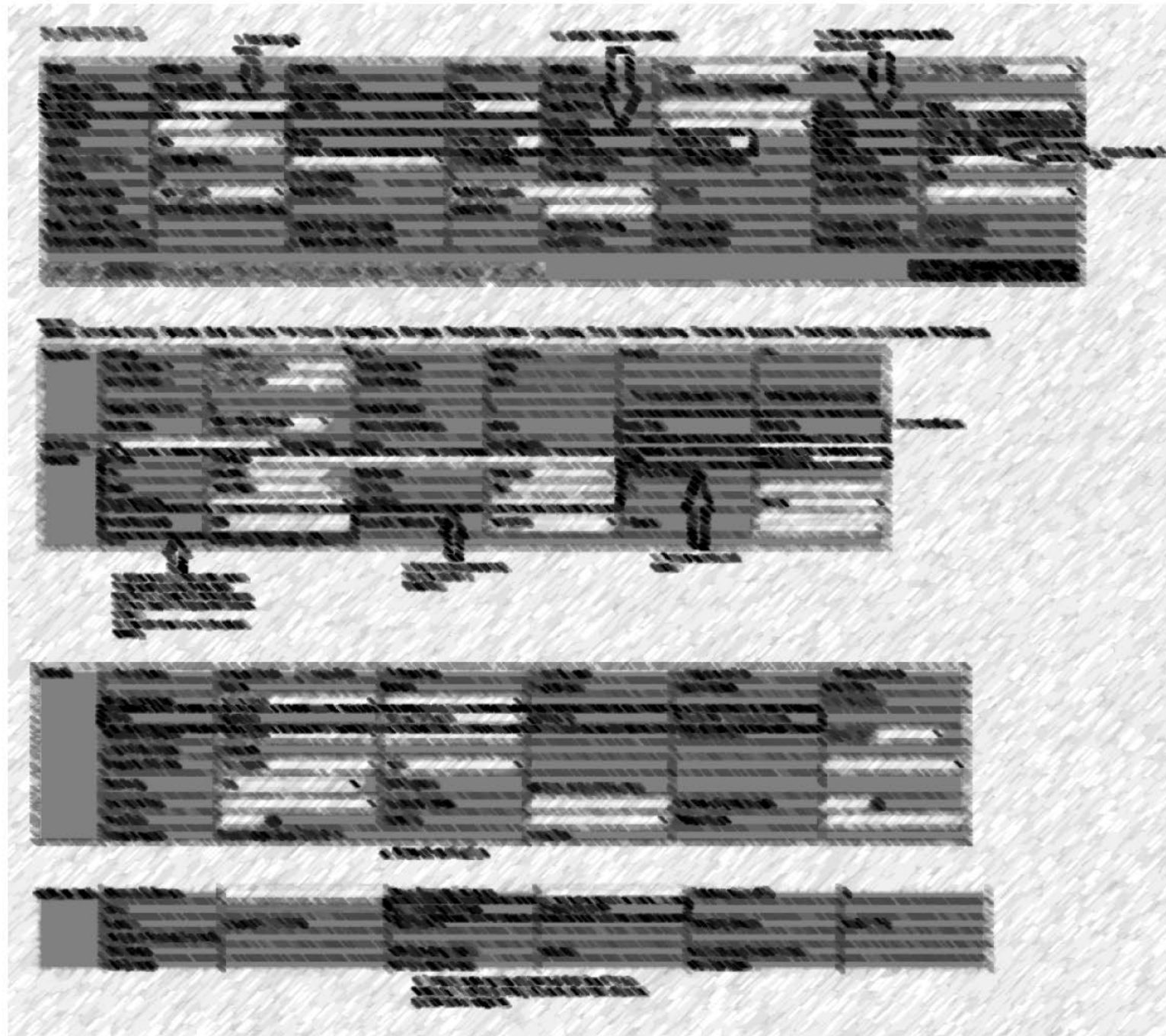
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Self-Excluded and Prohibited Patrons

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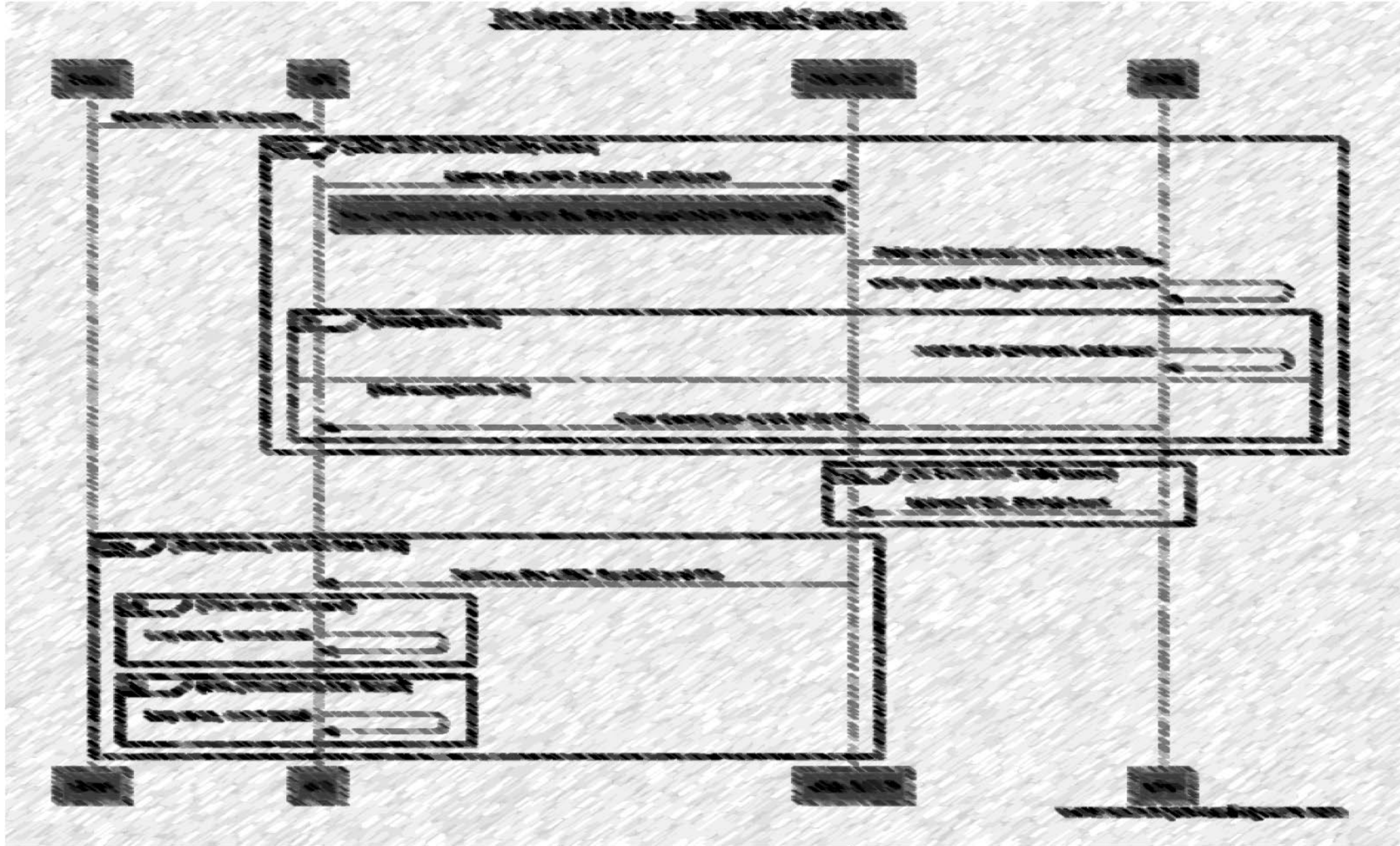
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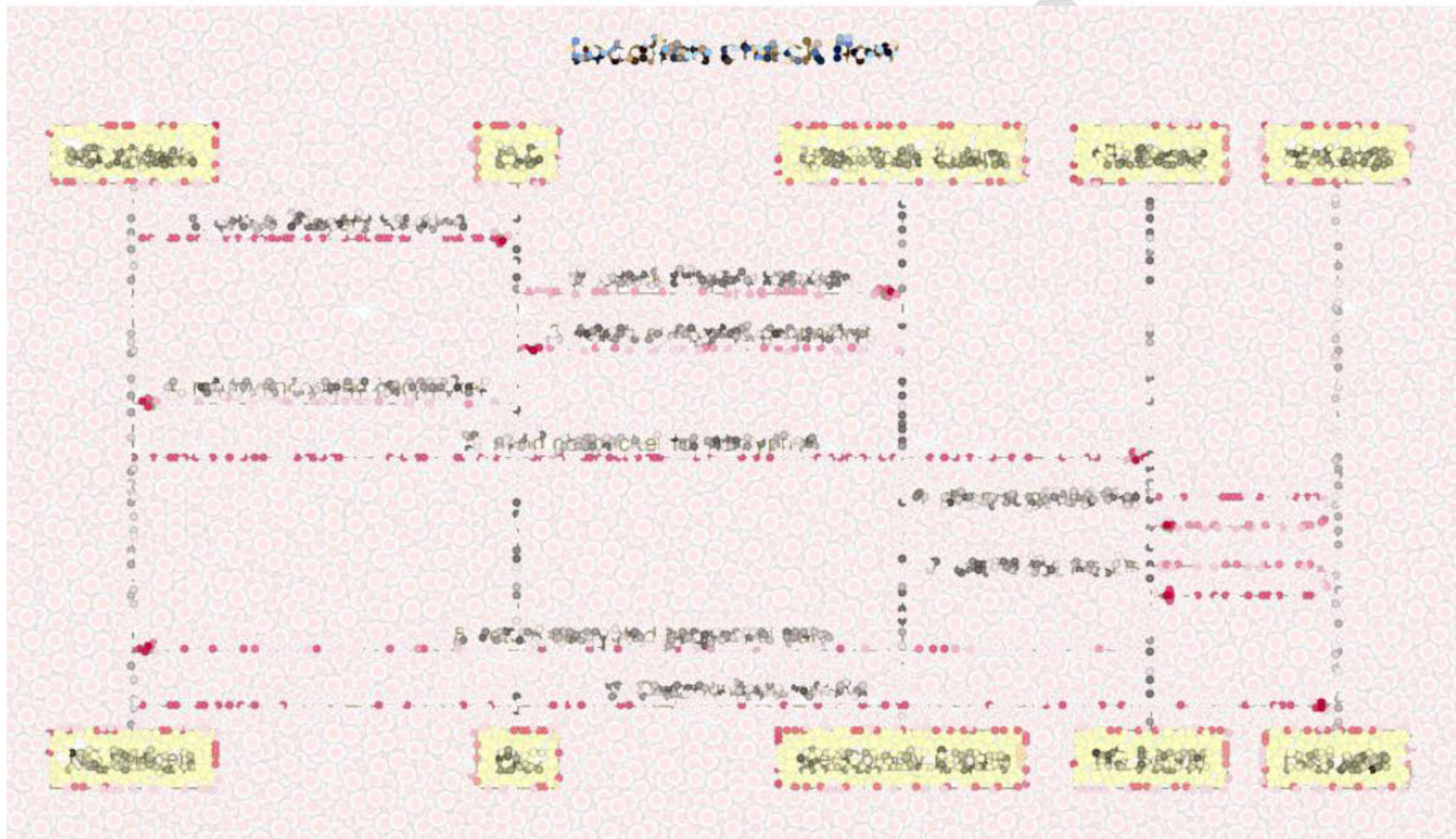


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Mobile Wagering Devices

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Reporting and Analytics

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System Maintenance

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Geolocation Error Messages to Patrons

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Customer Wager Information Access

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Terms of Service, Privacy Policy and Patron Protection Page

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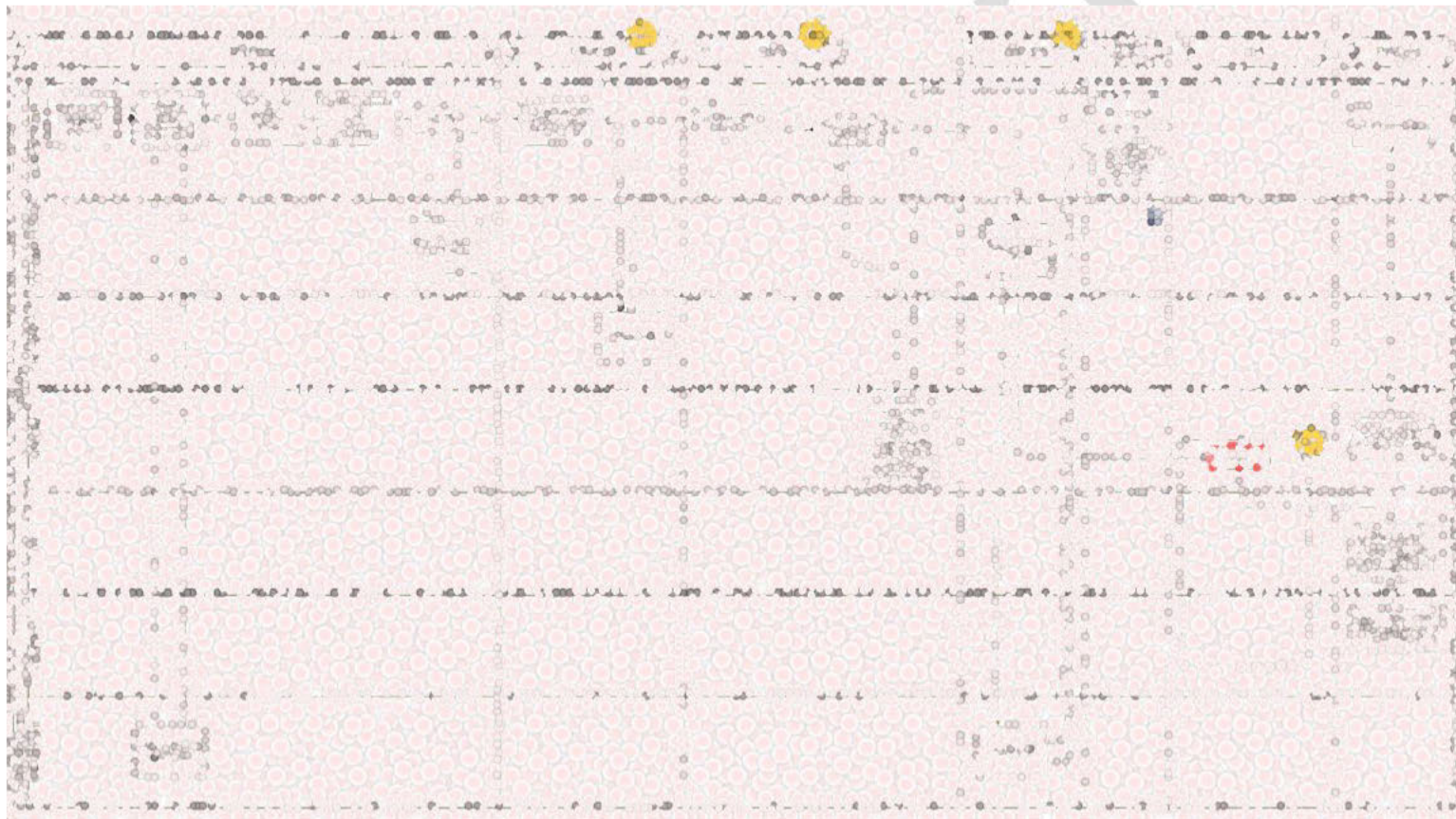
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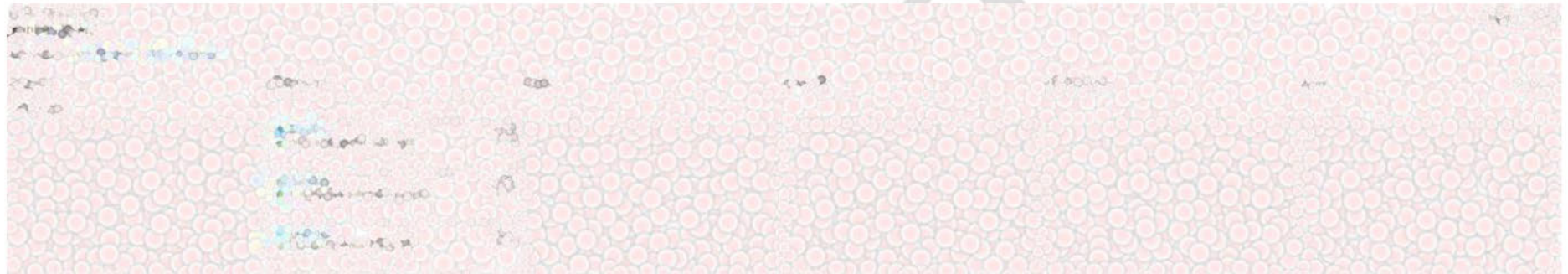
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INTERNAL CONTROLS FOR INTERNET & MOBILE



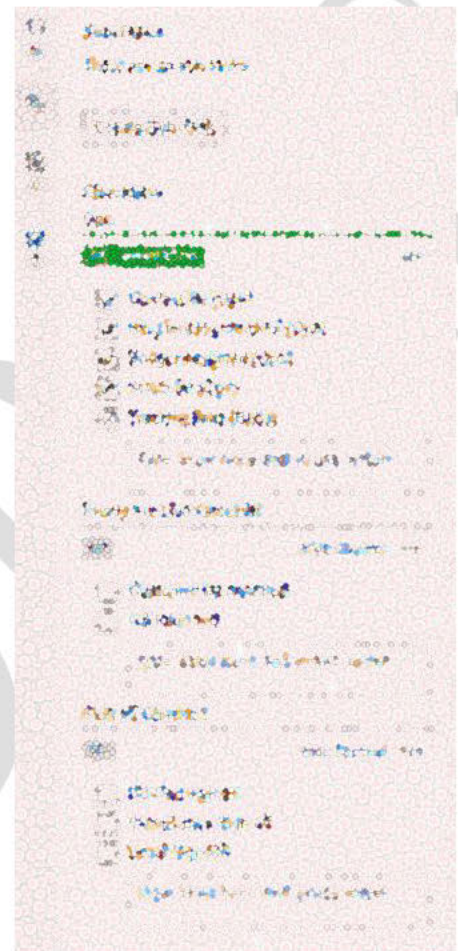
INTERNAL CONTROLS FOR INTERNET & MOBILE



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INTERNAL CONTROLS FOR INTERNET & MOBILE







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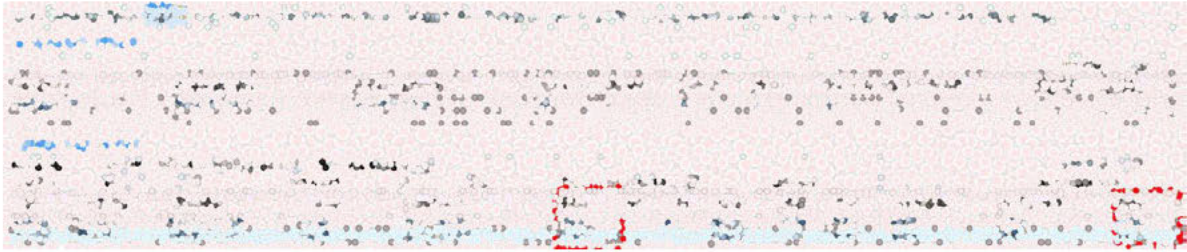
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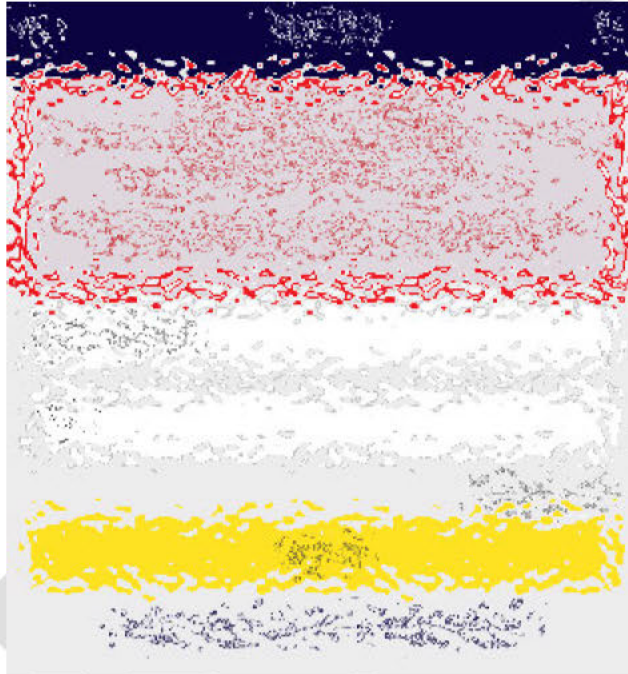
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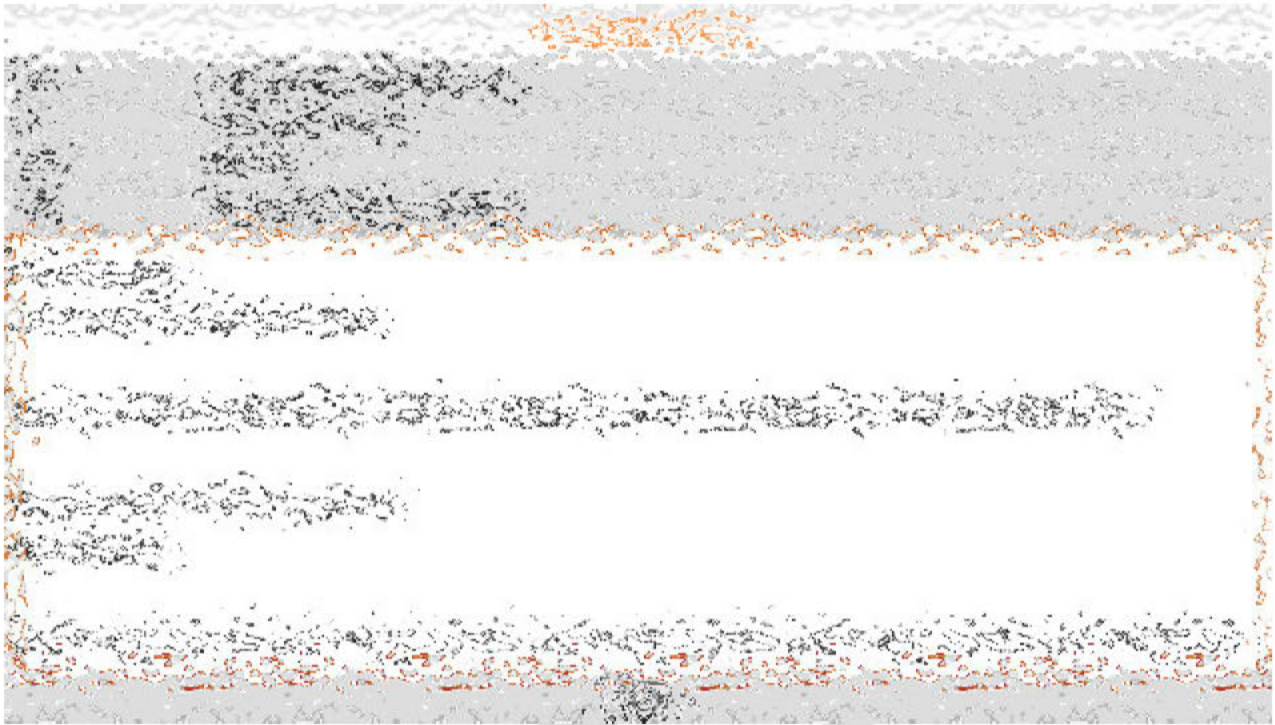
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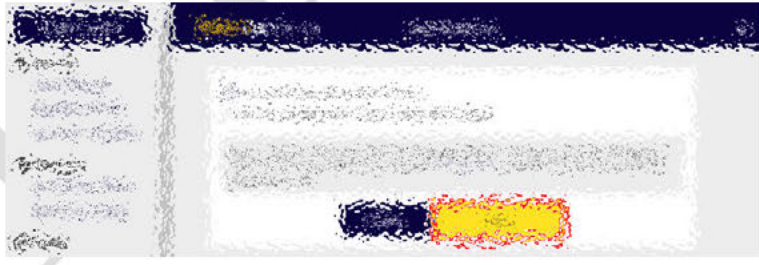
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Marketing and Promotions

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Celebrity Promotions

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DRAFT

Responsible Gambling

[REDACTED]

[REDACTED]

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[REDACTED]

[REDACTED]

[REDACTED]

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Patron Complaints

[REDACTED]

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High Risk Patrons

17. [Redacted]
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[REDACTED]

[REDACTED]

[REDACTED]

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Sports Wagering Lounge Assets

[REDACTED]

Accounting, Reconciliation and Test Account

[REDACTED]

Daily Reporting

[REDACTED]

Taxable Revenue Reconciliation

[REDACTED]

Deposits and Withdrawals

[REDACTED]

Cash Management – Bank Reconciliation and Funding of Patron Balance Account

[REDACTED]

[REDACTED]

Processing Check Withdrawal Requests

[REDACTED]

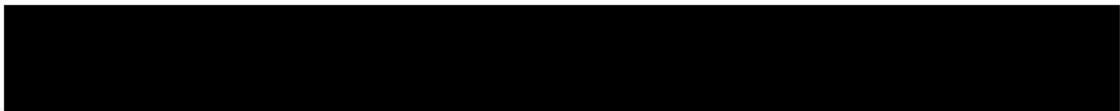
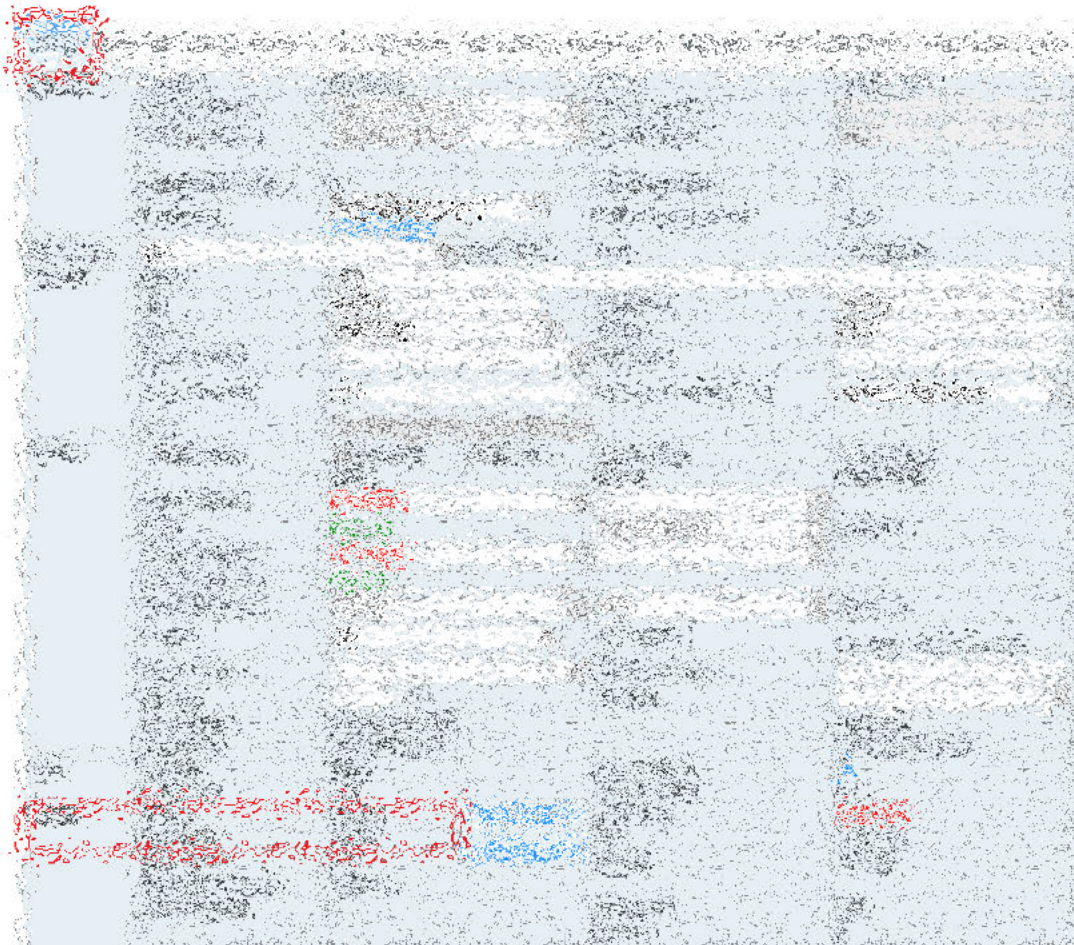
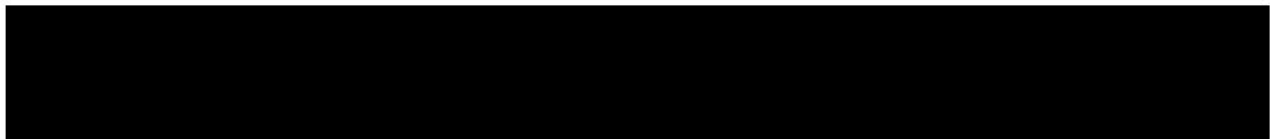
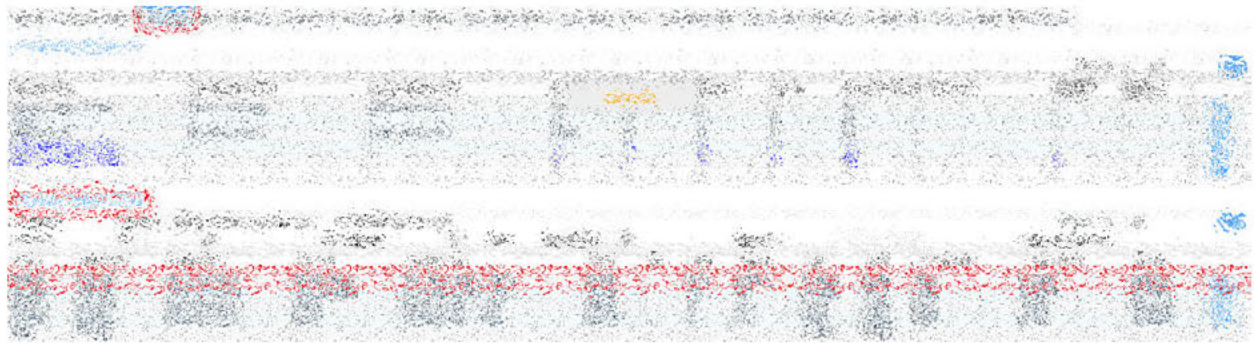
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[REDACTED]

[REDACTED]

W2G Audit / Reporting

[REDACTED]

[REDACTED]

[REDACTED]

1099 Tracking / Reporting

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

CTR Review and Filing

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Test Account Control Procedures

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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Deposit Test Account Control Procedures

[REDACTED]

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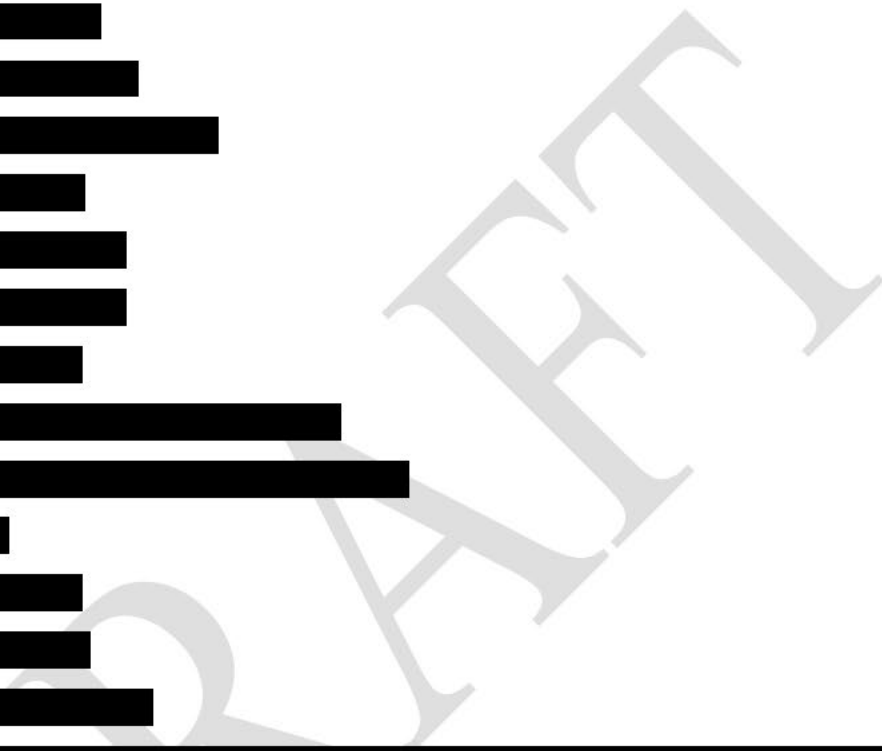
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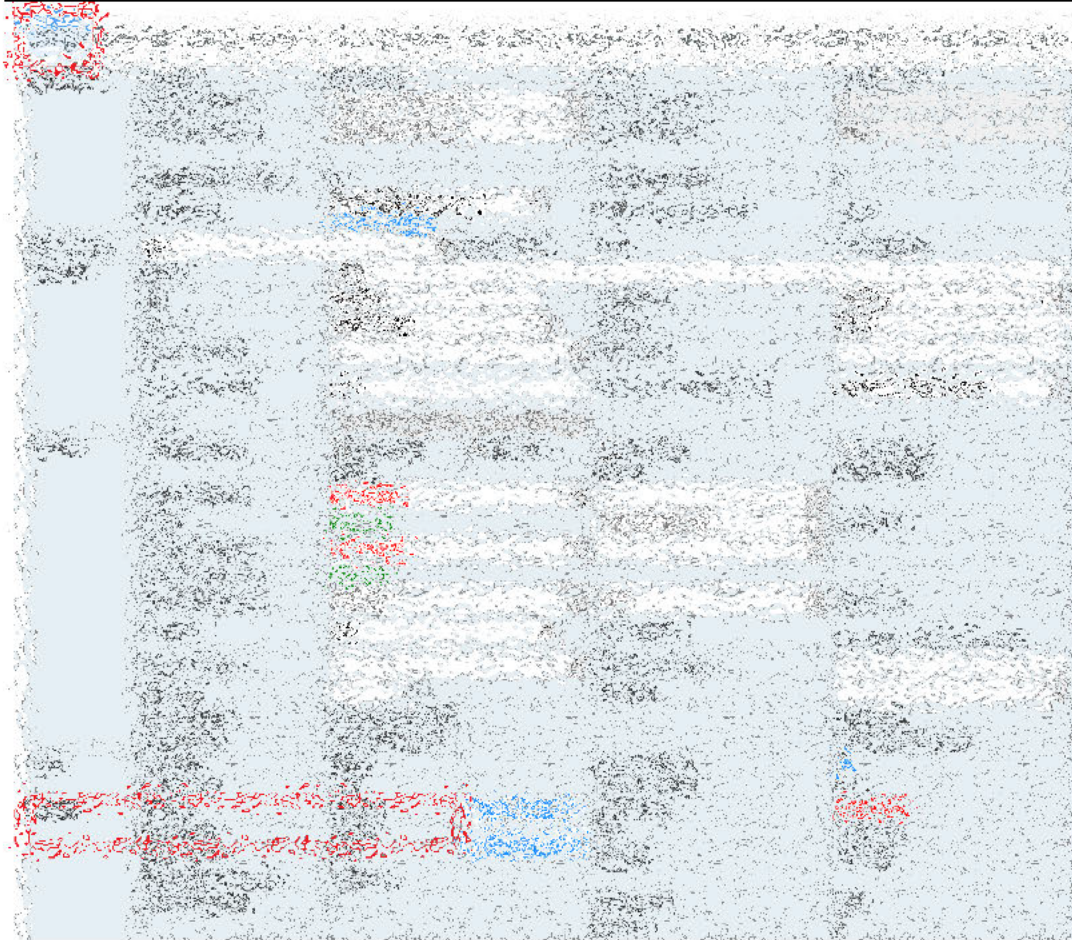
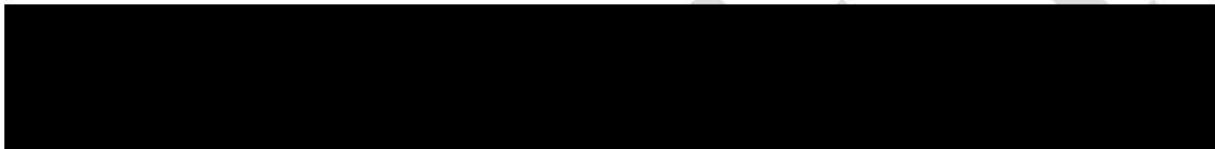
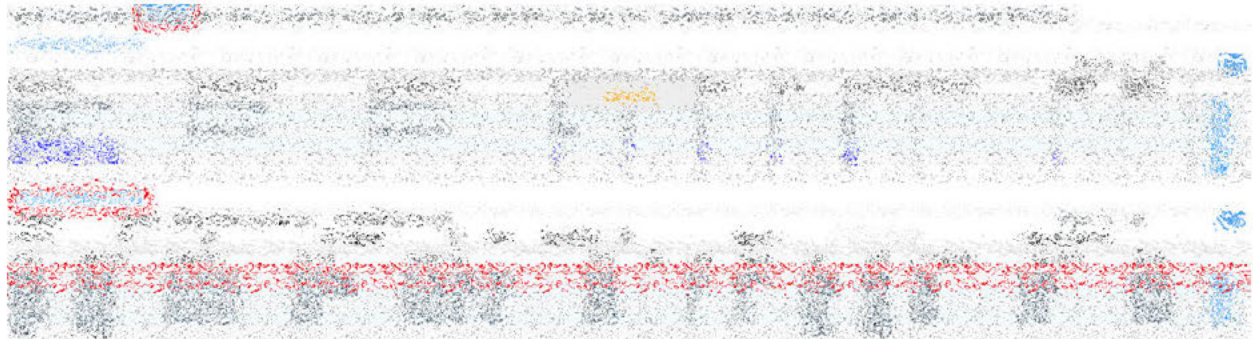
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The image shows a screenshot of a table with multiple columns and rows. The text is extremely blurry and distorted, making it impossible to read. There are some faint highlights in red and blue, possibly indicating specific data points or errors. The table appears to be a data grid or a list of items with associated details.



[REDACTED]

Deposit test account check request - Payments Operation

[REDACTED]

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[REDACTED]			
[REDACTED]		[REDACTED]	
[REDACTED]		[REDACTED]	
[REDACTED]		[REDACTED]	
[REDACTED]		[REDACTED]	
[REDACTED]		[REDACTED]	
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		[REDACTED]	
		[REDACTED]	
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[REDACTED]		[REDACTED]	

[Redacted content block containing multiple lines of blacked-out text]

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[REDACTED]

[REDACTED]

[REDACTED]

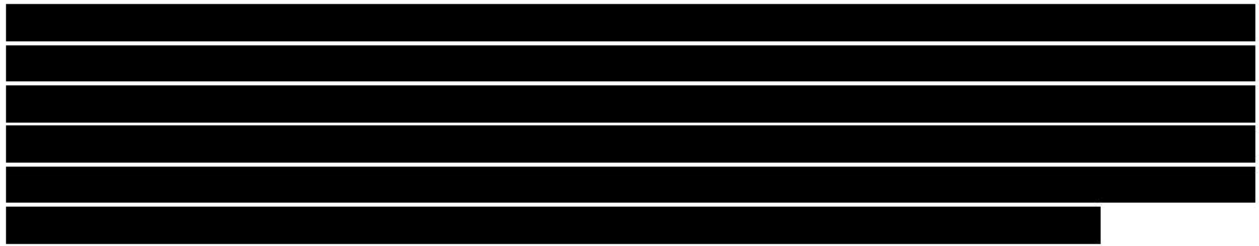
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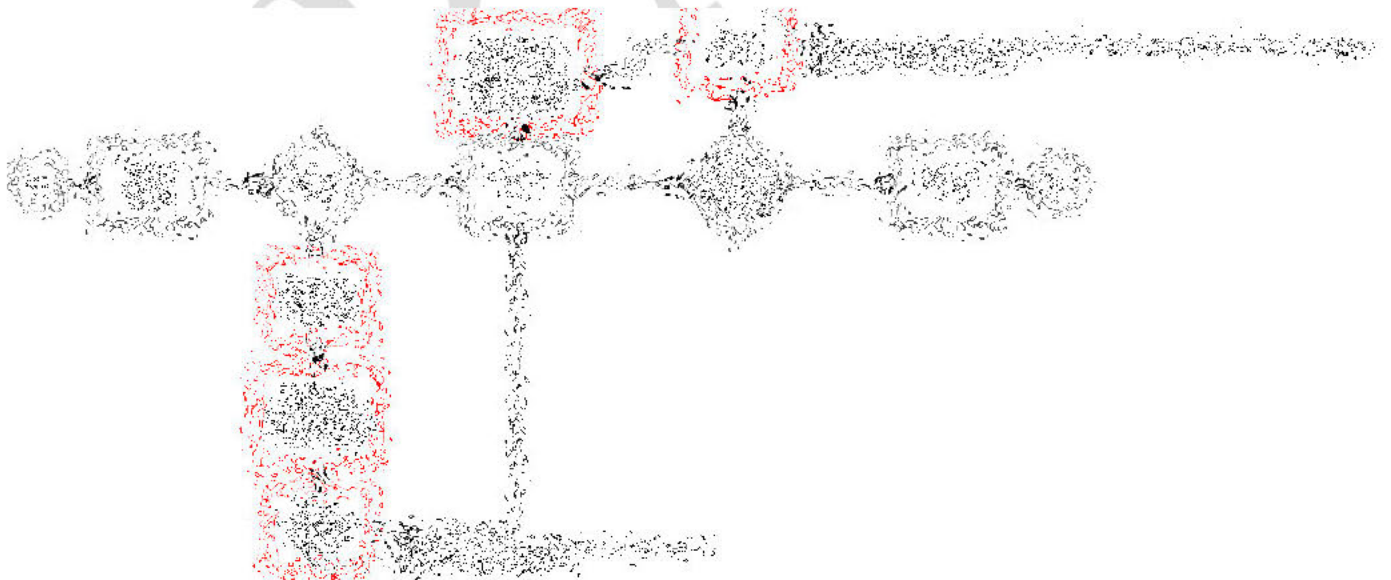
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[Redacted content]



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INTERNAL CONTROLS FOR INTERNET & MOBILE



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[REDACTED]

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Third-party service providers

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Patron Accounts

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[REDACTED]

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Patron Wagers

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Wagering Standards

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[REDACTED]

Anti-Money Laundering Compliance Standards

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[REDACTED]

Suspicious Activity Reporting

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CURRENCY TRANSACTION REPORT

[REDACTED]

FORM 8300

[REDACTED]

Integrity Monitoring

[REDACTED]

[REDACTED]

Review of This Document

[REDACTED]

Content Inclusion

The internal controls, which ensure the accuracy, reliability, and system integrity of controlled compute systems and data are contained in this document.

[REDACTED]