

(PART 1) – PLATFORM PROVIDER APPLICANT TECHNICAL PROPOSAL

6.1 EXPERIENCE

Summary of Section 6.1 – Experience

bet365 operates the largest mobile sports wagering brand in the world. Since our founding in 2000, we have grown from a staff of eight people to [REDACTED] employees with 63 million registered customers [REDACTED]. We are the market share leader in many of those countries, including the UK, Spain and Italy. In the U.S., we are continuing to grow our market share in New Jersey, where we have been live and operational since 2019. [REDACTED]

In 2020, our platform accepted almost [REDACTED]

As an operator, bet365 has the luxury of being the only customer-facing product that the bet365 platform supports. That platform is solely owned, developed, maintained and operated by over a thousand dedicated staff. It powers a customer journey that is optimized for the mobile sports environment, and it provides a technical infrastructure that satisfies the complex regulatory requirements and customer demands of a truly global platform. This includes the platform's capacity to manage exceptionally high volumes of traffic and process millions of wagers from hundreds of thousands of concurrent users.

Our platform was purpose-built for mobile sports wagering customers from its inception. We believe preserving a world-class customer experience is essential. We continually add new features to our product with the aim of creating greater customer value. [REDACTED]

[REDACTED] Dedicated in-house customer service, product and information technology teams routinely respond to customer feedback, monitor changes in industry and market trends, and capitalize on innovations in technology. [REDACTED]

While the platform has evolved over time to maintain its speed and efficiency, it has held true to the values of reliability and adaptability.

Reliability is key to our platform's well-established track record of managing enormous amounts of traffic and processing millions of wagers during major sporting events with no major downtime or data breaches. Customers wager with bet365 because they know they can count on our storefront to be open and operational no matter what. Our various staffing departments from customer service to regulatory compliance are well-versed in responding to circumstances as needs arise, and our existing and forthcoming data centers will further ensure our platform stability.

Our adaptability helps us evolve with customer demands and improve the customer-facing product, while also quickly configuring systems and processes to accommodate regulatory and compliance requirements. [REDACTED] we cater to an ethnically and culturally diverse customer base that mirrors New York's own demography. This is why offer our product in 21 languages, have the most customizable odds feeds based on local preferences, and promote the widest array of wagering markets.

But beyond customer loyalty, immense wagering volumes, and an extremely stable yet customizable technology stack, if there is one thing we have learned in our last 20 years of operating it has been the vital role that operators need to play in creating Sustainable Markets. As we detail later on, Sustainable Markets rely on policies and best practices that protect customers and allow for stable, long-term revenues.

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

Overview of the wagering activity conducted through the Platform / Wagering volume processed through the Platform / Wagering volume of sports wagering / Number of accounts maintained through the Platform.

We are a global mobile sports wagering operator [REDACTED] bet365 is both the operator and the platform, and our platform exclusively powers our mobile sports wagering product.

As the largest mobile sports wagering brand in the world, the full extent of the activity and volume across our global platform is immense. The size and scope of our global wagering activity gives us the reliability and experience that make us well-suited to operate in a populous, high GDP-per-capita jurisdiction like New York. We know how to handle hundreds of thousands of concurrently connected users and efficiently transact millions of wagers per hour. We have an established track record of doing so without major data breaches or platform crashes.

Our platform is not utilized anywhere in the world to conduct in-person retail or brick-and-mortar sports wagering. Instead, it exclusively facilitates either app-based wagering via mobile phones and tablets, or laptop and desktop-based wagering via personal computers. Our customer-facing product and platform are therefore exclusively optimized for the very type of mobile sports wagering that New York is licensing companies to conduct, making bet365 a natural fit to operate in your state.

EXHIBIT 8

bet365 Global Mobile Sports Wagering Statistics – 2020	
Total sports wagering handle	[REDACTED]
Total sports wagering revenue	[REDACTED]
Total number of sports wagers processed	[REDACTED]
Total registered customers	63 million
Percentage of wagering revenue from in-play wagers (as opposed to pre-game)	[REDACTED]
Percentage of wagering revenue from phone and tablet wagers (as opposed to computers)	[REDACTED]
Total number of wagers processed per day on peak traffic days	[REDACTED]

We measure our platform's activity in a variety of ways, including handle, revenue and total amount of individual wagers processed. But however you choose to measure wagering activity and wagering volume, bet365 is either at or near the top of the industry in every global category.

[REDACTED]

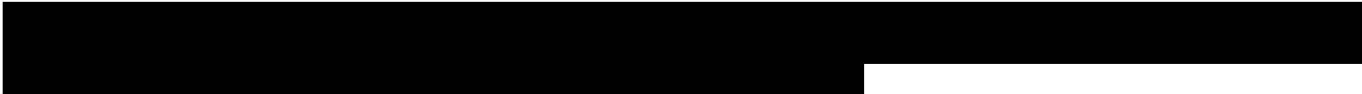
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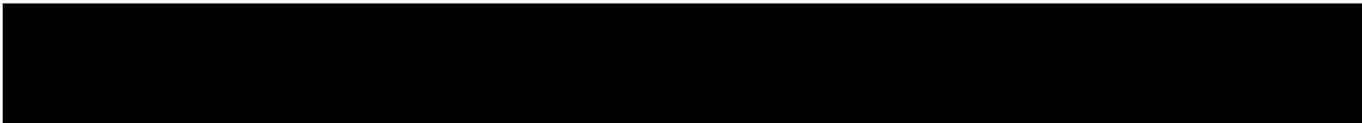


EXHIBIT 9

Global Wagering Volume On Major Sporting Events	
Event	Total Number of Wagers (approximately)
2020 U.S. Open (Tennis)	████████
Super Bowl LV	██████
2021 NBA Finals	████████
2021 NCAA Men's Basketball Tournament	████████
Euros 2020 Final (Soccer)	████████
2021 Stanley Cup Finals	██████



Our platform powers a website that is fully responsive and written in HTML 5, in addition to supporting apps for both iOS and Android. We utilize one code-base to build the backend that powers both app-based wagering on a phone or tablet built to detect and adapt the content of the site to the type of device type our customer is using. If a customer is using an iPhone, our product will display to them from a sizing and spacing perspective as it should on a mobile phone, whereas if they're accessing our product with a tablet, it will scale the size of the window on the customer's screen.



When millions of people from different part of the world are utilizing your platform, it is critical that you make your product offering flexible, customizable and as geographically relevant as possible so that you appeal to as broad a customer base as possible. It is no different in New York, one of the most diverse states in the U.S. and a veritable melting pot of cultures, ethnicities, languages and sports. If licensed in New York, bet365 would be committed to offering a wagering experience that is as authentic and as adaptable as possible for all New Yorkers – not just those New Yorkers born in the U.S. We currently do this by offering our platform to all customers in 21 different languages and counting, including the most prevalent non-English languages spoken in the New York area, like Spanish (19.4% of New York Area residents), Chinese (3.1%), Russian (1.4%) and Italian (1.2%).²

For those native speakers who are interested in wagering on their home country’s events in addition to their adopted home’s Nets, Yankees, Bills or Islanders, we will have the largest catalogue of events from across the globe to cater to them between innings, periods or quarters. We offer as deep and experienced of trading markets for the NBA, MLB and the NFL as we do for over 10 levels of men’s and women’s Spanish soccer, over 20 different Italian basketball leagues and competitions, and half a dozen levels of Russian professional hockey.

Because of our prowess when it comes to live streaming, Chinese or Spanish-speaking customers will be able to stream countless events from their home country and around the world on our platform while they bet – which means bet365 becomes not just the platform they bet on, but the TV on which they watch the games they bet on. When they’re wagering, they’re not just able to do so in a language and on events they’re most familiar with. They’re able to do so in the odds format they are most familiar with. Sure, your average New Yorker might be used to American Odds, (e.g. -110). But Spanish or Italian ex-pats might be more used to Decimal Odds (e.g. 1.91) or Fractional Odds (e.g. 11/10), and those from China could prefer Asian Odds, all of which are available on the bet365 platform.

New York deserves a sportsbook that is as culturally and ethnically diverse as the state itself. Whatever their preference for sports, league, language, geography or odds, bet365 will have all 21-and-older New Yorkers covered. This means that more people will spend more time on our platform, which means they will wager more often, which ultimately means a larger amount of tax revenue for the state of New York.

Jurisdictions where the Applicant operates the Platform

[Redacted]

[Redacted]

[Redacted]

[Redacted]

² <https://www.worldatlas.com/articles/how-many-languages-are-spoken-in-nyc.html>

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Jurisdictions where the Operator is licensed and operating / Estimated market share within each jurisdiction

As the global leader in mobile sports wagering, bet365 has 20 years of mobile sports wagering operational experience [REDACTED]

[REDACTED]

The increase in our share in New Jersey is in part attributable to marketing investments with three New York-based professional sports teams: The New York Yankees and the New York Mets, where our signage features in the outfield at both Yankee Stadium and Citi Field, as well as the New York Jets. The Jets sponsorship has proven particularly innovative, as it allows bet365 to partner with NFL personalities to create the production of a weekly digital web series called “The Numbers Game,” and then integrate the content of that web series into the Jets weekly pre-game show on SNY. Additionally, we have also worked with MSG Network to implement a first-to-market live odds TV commercial, which shows viewers up-to-the-minute odds on relevant games.



Internationally, we continue to be the market share leader in several jurisdictions by a wide margin, including but not limited to the United Kingdom, Denmark, Spain, Greece, Italy and Bulgaria (see chart below).

Our team of regulatory compliance professionals have extensive experience working with regulators across the world, making sure we're not only meeting but exceeding the standards set by policymakers in the world's most experienced mobile sports wagering jurisdictions.



Please see the below Exhibits 10 and 11 for more detailed information.

EXHIBIT 10

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[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]	[Redacted]
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[REDACTED]

EXHIBIT 11

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

Current integration of the Platform with other Operators / Platforms currently used to accept wagers

The bet365 platform does not integrate with any outside operators or platforms. This is because our platform is a purpose-built platform, developed and maintained exclusively to run the bet365 mobile sports wagering product.

[REDACTED]

[REDACTED]



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

As one of the longest standing mobile sports wagering operators in the world, our experience has taught us what can happen when jurisdictions do not take responsible gaming measures seriously. Customers are harmed. Markets constrict. State revenues can decline sharply. No one wins.

Having received our first mobile sports wagering license in 2007, we're not a fly-by-night operation. We invest in jurisdictions for the long-term by investing in our customers for the long-term. At the forefront of this investment is not just strictly observing, but exceeding, the responsible gaming requirements set forth by regulators.

Following and furthering responsible gaming best practices helps foster what we refer to as Sustainable Markets. Sustainable Markets are jurisdictions that do not suffer major cutbacks or scandals, are not curtailed or restricted, do not cause public health scares and do not come under significant scrutiny for major oversights or lapses in judgement.

The story of non-Nevada U.S. mobile sports wagering market is barely three years old, but it is much older in other areas of the world. With our experience in other jurisdictions, we have "read this story before," so to speak. We know what industry best practices to leverage and what warning signs to watch out for – not just in year 3 or a mobile sports wagering market, but in year 13. We know how quickly markets can go from sustainable to unsustainable.

For example, jurisdictions like Spain and Italy are currently reckoning with wide-ranging cutbacks and overcorrections, including near-total bans on advertising. These measures came about as a reaction to the perception that mobile sports wagering was harming customers. These measures are also limiting these jurisdictions' growth and the amount of revenue to the state. If implemented in New York, these measures would surely do the same. Jurisdictions that think proactively, act responsibly, and take proper steps to protect all stakeholders can avoid this reckoning and instead create truly Sustainable Markets, and allow for the type of long-term financial strength that New York is counting on.

We believe there is no better indicator of our experience than the best practices we have developed and utilized over two decades to help foster Sustainable Markets. These best practices are ground in our approach to responsible gaming resources and education, as well as our approach to responsible and truthful advertising and promotions.

Responsible Gaming Resources and Education

bet365's long-standing commitment to not only comply with but exceed the responsible gaming requirements in the jurisdictions within which it operate is a vital element of our service and key to the success of the company.

We are committed – well beyond mere lip service – to the promotion of responsible gaming and provide a range of protection measures for our customers, raising their awareness and empowering them to make informed choices on how to regulate and manage their wagering.

Although not required by regulation, we operate a standalone website for our New Jersey platform (<https://responsiblegaming.nj.bet365.com>) that is specifically dedicated to responsible gaming. This is constantly undergoing necessary changes and updates to ensure it provides accurate information in an engaging way for our customers.

We provide a range of responsible gaming tools and options to help customers manage their wagering activity, including limits on the amount of time they're logged into our platform, the amount of money they're allowed to wager, and the amount of money they're allowed to deposit. We have invested significant software development resources in recent years into building innovative wagering management tools that go above and beyond regulatory requirements. For example, we have developed a tool that allows the customer to set curfew periods.

bet365 fully supports ongoing initiatives aimed at raising awareness of responsible gaming issues and ultimately raising standards throughout the industry. By way of example, we are a member of the iDevelopment and Economic Association (iDEA). Through our membership, we played a prominent role in the development of iDEA's Responsible Gaming Pillars (https://ideagrowth.org/wp-content/uploads/2020/07/iDEA_Responsible-Gaming-Pillars.pdf) a comprehensive guide to industry integrity and best practices in mobile sports wagering.

We recognize that a small minority of customers need us to proactively help them protect themselves from wagering-related harm – we cannot wait for them to use the tools we provide. As such, we take extra steps and play a more active role in protecting them. These proactive measures are in place to identify and interact with customers who may be at risk of experiencing harm, and are designed to minimize that risk. Our Early Risk Detection System (ERDS) monitors customer activity for behaviors that may indicate the customer is an at risk customer.

These systems and processes have improved over time in accordance with emerging research, industry best practices and other relevant guidance. One such system, self-exclusion, is an important tool for a customer to utilize when they no longer feel in control of their wagering. We have a demonstrated history of compliance with self-exclusion requirements, and were involved in the development of the National Online Self-Exclusion Scheme in the United Kingdom.

bet365's responsible gaming employee training programs follow a blended approach of classroom delivery, in-house development and computer-based learning and assessment. Responsible gaming training is delivered to all customer-facing employees within the first week of their employment at bet365.

Our staff receive training so that they are aware of the signs that could indicate that a customer may be experiencing harm associated with gaming. These signs including customer cues that could indicate potential vulnerability. Training also provides staff with the skills required to interact with customers who are facing responsible gaming issues and to escalate such issues when required.

Further training is provided as staff members progress in their career with bet365 and move into more specialized teams. Customer-facing staff will complete computer-based responsible gaming refresher training and a compliance assessment on an annual basis.

All responsible gaming training and assessment records are maintained by a dedicated training department. Training materials are reviewed and audited on a regular basis.

Furthermore, bet365's intranet provides up-to-date information and support to both advisors and management teams in relation to responsible gaming policies and related procedures.

Responsible Advertising and Promotions

A comprehensive approach to responsible gaming also captures responsible advertising, as well as responsible promotions and bonusing.

Our marketing and advertising are undertaken in a socially responsible manner. This includes listing terms and conditions of offers or promotions that are open and clear, responsibly targeting these offers or promotions, and avoiding marketing to those that may be at risk of experiencing harm.

In particular, we believe that any bonus or promotional offer must always be accompanied by a clear and accurate summary of its terms and conditions, and that those terms should not encourage excessive wagering. We believe this means listing terms that are full, transparent and devoid of misleading information, and showcasing the summary of these terms in advertising materials in close proximity to the headline claim of the offer, as well as putting the full terms and conditions just one click away.

We also believe customers should not be restricted from withdrawing their own funds used in conjunction with, or withdraw any winnings resulting from, any risk-free bet.

Further, we believe operators are obligated to not describe promotions as free unless they are absolutely free and not describe them as “risk-free” if a customer needs to incur any loss or risk their own money to use or withdraw winnings from the risk-free bet.

We also take our responsibility to protect children and young people very seriously. This includes ensuring we do not target minors or prohibited wagerers with advertisements or promotions.

6.2 EXPERTISE

Summary of Section 6.2 - Expertise

Our bespoke mobile sports wagering platform and our award-winning customer-facing product are enhanced by the expertise that only decades of operation can provide.

Unlike many other operators, bet365 develops, maintains and innovates nearly every aspect of our in-house mobile sports wagering technology platform. The absence of dependencies on external support means that we have the capability to invest with depth and agility in fulfilling industry and customer needs. It also means we can take a bespoke approach, customizing our platform and business decisions to the unique interests and obligations of specific regions and markets.

This institutional knowledge, as well as the hiring of several key executive staff with decades of collective U.S. mobile sports wagering experience, fosters our understanding of what customers in difference states want. It also allows us to identify further opportunities for the growth of what we refer to throughout this document as Sustainable Markets.

Industry stakeholders in both Europe and the U.S. have recognized our accomplishments many times over, whether it's being named atop the EGR Power 50 list for 10 consecutive years, being named SBC's Bookmaker of the Year or Sportsbook of the Year for six consecutive years, or earning a top-three ranking in consecutive industry-wide evaluations of the U.S.'s best mobile sports wagering applications.

Our expertise lies within the platform technology we employ and the dedicated staff that maintains it. Many internal departments, detailed further on in this section, play key roles in our platform's stability. Perhaps mostly notably, our team of [REDACTED] software and IT staff, dwarfing many of our competitors in size and technical expertise, ensures that every element of our platform is running as it should. This staff has also played a critical role in our achieving of external accreditations and certifications regarding the safety and security of our platform, ensuring that sensitive business and customer information is protected. We support the integrity of our business by investing heavily in information security, both to protect our customers and our intellectual property. Informed by years in the industry, we go above and beyond to monitor for suspicious activity and fraud and to proactively work to ensure responsible gaming.

We are continually improving our product and identifying new opportunities to offer value to our customers. A part of that means providing the widest possible range of choice to our customers through an extensive and dynamic catalogue of events and markets. [REDACTED]

This combination of a robust technological infrastructure, a bespoke and innovative product, and a seasoned workforce, underscores bet365's expertise. If we are granted a mobile sports wagering license this expertise will bring significant value to the New York market, enabling robust customer choice, sensible customer protections, and the sustainable growth necessary to drive lasting revenue to the state.

An overview of the technical features and operation of the Platform / An outline of any technology to be used or features offered that the Applicant or Operator believes sets the Applicant apart

As mentioned in the previous sections, the bet365 platform and the bet365 operator are the same entity. This allows our mobile sports wagering platform to be dedicated exclusively to optimizing bet365's customer-facing product.

Our platform has earned some of the highest accolades available both internationally and domestically. We are winners many times over of the coveted top ranking in the annual EGR Power 50 ranking. We placed first on this list, which is the definitive industry ranking of the most dynamic mobile sports wagering companies in the industry, for 10 straight years from 2010 to 2019. We also won the EGR Sports Betting Operator of the Year Award in eight of the past 10 years, and its best Mobile Sports Product Award the past four years.

SBC has named us either Bookmaker of the Year or Sportsbook of the Year in each of the last six years.

In the U.S., the country's leading mobile sports wagering market research firm has twice ranked us in the top three of U.S. sportsbook apps. In a Fall 2020 ranking of 16 New Jersey mobile sports wagering applications by Eilers & Krejcik, bet365 placed second, just above DraftKings and just below FanDuel. Eilers & Krejcik noted that what set our platform apart was a fast, responsive and easy-to-use layout, and a simple interface with great live event streaming and exceptional features.

In a July 2021 evaluation of 31 mobile sports wagering applications throughout the U.S., we finished third, in spite of not yet having completed rolling out our new U.S. dedicated technology solution detailed elsewhere in this document.

Beyond awards and recognition, our platform that illustrates our expertise is our ability to customize the platform to meet the regulatory requirements and market demands of a specific jurisdiction.

The method in which our system is designed and implemented starts with a base of core functionality that can be shared across multiple jurisdictions. As we enter new markets, a jurisdictional review is performed to see if anything outside of this core functionality needs to be modified or built upon to create a compliant platform.

This hub-and-spoke model allows us to make jurisdictional specific updates in a timely fashion when requested by a regulator, without impacting our other operations in other states that share the core system functionality. It also enables our customers to have a shared user experience across multiple jurisdictions with little to no friction points.

The platform was built and is maintained entirely in-house by an extensive team of developers, and is operated by a fully in-house trading and customer service operation. The fact that the system is fully in-house means that the decisions on platform investment are totally within our control.

This gives bet365 the ultimate flexibility to cater to compliance requirements or the evolving customer demands of a jurisdiction like New York, while also basing investment decisions around internal business decisions only. This contrasts with the outsourced third-party platforms used by many of our competitors.

A Highly-Ranked App

“The leading European mobile sports wagering app gets a U.S. makeover that retains most of what makes it so successful: a fast, responsive, and easy-to-use layout, a simple betting interface, great streaming and exceptional features.”

“Following the action is just as effortless with either live streaming, live audio, or game tracking visualizations. Intuitive features such as the Edit Bet functionality significantly enhance the betting experience, and the less intuitive features have short tutorials ensuring accessibility to everyone.”

- Eilers & Krejcik Gaming, October 2020 Ranking of New Jersey mobile sports wagering applications, in which bet365 ranked 2nd

EXHIBIT 12

The bet365 Platform & Technology Staff "By The Numbers"	
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
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[REDACTED]

[REDACTED]

[REDACTED]

Because we are the only operator that the bet365 platform supports, both in this application but also across the entire wagering industry, we can devote the entirety of these staffing resources to any issues that might arise with our sportsbook, as opposed to needing to divert those resources to other operator brands.

As a worldwide leader in the mobile sports wagering space, it is imperative for bet365 to remain fully committed to information security and data protection, safeguarding not only our businesses sensitive internal information but also customer information for those who look to utilize our services globally. As part of this commitment, we are proud to hold multiple information security accreditations including certifications against the International Security Organization (ISO) 27001 and Payment Card Industry (PCI) standards. We have also applied the applicable sections of the National Institute of Standards and Technology (NIST) standards to our operations to ensure our information is as protected as possible.

Our expertise also extends to the protection of sensitive information. Beyond these external accreditations, bet365 has numerous policies and procedures in place to protect what could be deemed sensitive information from getting in the wrong hands. Our network access control policy specifically is based upon the principle of "least access." This means granting the fewest possible people the minimum permission required in order to maintain, develop and operate the network. This policy details data classification processes including the management of highly confidential data, role-based access control, describing how each user's access privileges are authorized according to their business need, system access control managed via strict user ID and password requirements, and the monitoring of changes to network devices via industry-proven tracking tools including Remedy. It also directs employees accessing various infrastructure components in bet365 data centers to utilize two-factor authentication, such as an ID card and keypad.

Each piece of data within our systems is classified as needed and protected based on that classification while in storage, when in transit and when being accessed. For example, data related to a customer's SSN as well as credit card numbers and bank account/routing numbers would be classified as highly confidential

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Trading, Odds and Pricing Expertise

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[REDACTED]

This trading staff also ensures that our odds are priced in ways that return the most value to the customer while still remaining competitive. Some U.S. operators in other states, whether by choice or by virtue of mandated policy, will offer customers low payouts – winning perhaps 80 cents or 85 cents for every dollar successfully wagered instead of the industry standard of 91 cents (or more). We find this objectionable, and will always aim to out-offer our competitors on price. While this means our margins might be a bit less than those of our competitors it also means that more and more customers will wager with us in the long-term because they recognize that we offer them the best price. We are routinely featured on odds aggregation services like Oddschecker as offering the best prices on a given market. This leads to greater wagering volume, and ultimately more revenue generated for the state of New York.

Our trading staff not only differentiates us from our competitors by virtue of its size. It also fuels our extremely robust global catalogue – the different sporting events on which we offer wagering.

It has always been bet365's goal to have the biggest storefront of wagering options, across different event, so that customers have the greatest amount of wagering choices available to them.

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

EXHIBIT 13

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

[REDACTED]

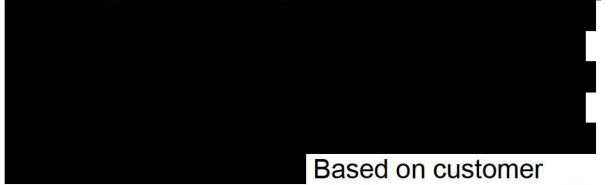
[REDACTED]

[REDACTED]

While we understand that the catalogue submission process in New York is subject to approval as well as certain statutory limitations, we would intend to offer as close to our global catalogue as possible. This is for several reasons.

First, as expressed earlier in this document, we believe passionately that offering customers the widest array of choices helps create the best possible customer experience. Revisiting the Yankees example from above, would New York fans rather have the choice of wagering on just the run line, the overall game winner or the total runs scored in the game? Or would they rather have the choice of wagering on over 100 customized markets involving their favorite players, like whether Giancarlo Stanton will hit a home run, how many batters Gerrit Cole will strike out, which team will be the first to score a run, whether the game will go into extra innings, or how many total batters will reach base? With our catalogue offering, we can provide New York customers with the latter scenario, so that no matter what inning the game is in, there's always something new and exciting to wager on.

Second, the size and scope of our catalogue differentiates us from our competitors. The above figures dwarf those of the other major U.S. operators' catalogues. We are one of the very few operators in the world able to responsibly support this many events and sports.



Based on customer behavior in other mature jurisdictions, we know that in the long-term our customers will notice this difference between us and our competitors, and will rely on our platform if they want to be sure they can get a wager down.

Third, having a bigger marketplace ultimately results in maximizing the size of that market. Operators that take our approach to having the biggest storefront possible will help the amount of mobile sports wagering handle in New York exceed projections. This will ultimately result in a larger amount of revenue for the state of New York.

For more information on the extent of our preferred catalogue offerings, please find the Word document summary of the catalogue, as well as the full sample catalogue we would prefer to offer if we receive a mobile sports wagering license in New York, attached for reference as Appendices C3 and C4, respectively.

“Events” vs. “Markets” vs. “Wagering Options”

To illustrate what we mean by games, markets and wagering options, let's use an example where a customer is wagering on a game between the New York Yankees and the Boston Red Sox.

The game in question between the two teams is the “event.” When that customer pulls up the event on our platform, they are presented with usually well over 100 different varieties of wagers within that event, otherwise referred to as “markets.”

Some of the more popular of these wagering “markets” for baseball include the moneyline (which team will win), the total (how many runs will the two teams combine to score), and the run line (the odds that a certain team will win by a certain amount of runs).

By individual “wagering options,” we mean individual choices to wager on within a market. For example, if in the run line market the Yankees are favored to win by 1.5 runs, we don't just offer customers the chance to wager on that one “option” for a winning margin. We offer different odds for the Yankees to win by 6.5 runs, and 5.5 runs, and 4.5 runs and so on. Sometimes individual markets like these can have up to 20 or 30 of these distinct “wagering options.”

An overview of how the Applicant will provide continual support and maintenance of the Platform / An outline of the features of the Platform designed to support the Operator

To keep our global operation running smoothly and effectively, it is essential that we not only have the right tools for the job, but also the right personnel. When almost everything is handled in-house, as is the case at bet365, that single job becomes hundreds if not thousands of jobs. But our staff of [redacted] team members are always up for the challenge to get the job done at the highest level of excellence

The list of software and IT departments (and their accompanying job descriptions) below encompasses the key groups that provide significant support and maintenance of the bet365 platform, and ensure our product stays innovative and adaptive.





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

We believe that if the Commission were to award a license at the start of December we would have a fully operational platform serving New York customers by the end of January 2022.

While the servers that accept and record the wager will be located in whatever licensed gaming facility the Commission prescribes, the platform will be built from our forthcoming U.S. regional data center (see Section 6.4 for more information). This should allow adequate time for us to make all necessary infrastructure changes,

develop and set up the wager acceptance servers, complete all third-party agreements required to operate the platform within the state, and complete any additional development and testing of the platform to meet the requirements set out in the finalized regulations.

If licensed, we would utilize the domain name www.ny.bet365.com for laptop and desktop-based wagering, and for smartphone and tablet-based wagering would make use of our already approved bet365 mobile applications in both the U.S. iOS and Android stores. We would look to launch each of these verticals simultaneously.

Additional information the Applicant believes relevant to demonstrate the Platform / Operator's Expertise

Several elements of our platform offer customers industry-leading innovations to make the mobile sports wagering experience more customizable, adaptable and engaging. Our customers take advantage of these features at a consistently high rate.

Cash Out and Edit Bet

One such feature is our Cash Out feature, which we were among the first operators to develop. The Cash Out feature gives customers more control over their wagers and offers an opportunity to make money on a wager before that wager has "won." For example, say a customer wagered \$50 to win \$45 on the New York Giants to beat the Philadelphia Eagles, and the Giants led the Eagles 24-21 at the start of the fourth quarter. If the Cash Out feature was enabled then a customer could choose to "win" their wager at the start of the fourth quarter, before the Giants had actually won the game, in exchange for a payout slightly less than \$45. As soon as the customer chose the Cash Out feature, the winnings would be deposited in their account and the final outcome of the game would no longer matter.

Another feature that complements Cash Out is the Edit Bet feature. Edit Bet gives you the option to add, swap or remove selections and increase the risk on both pre-match and in-play wagers. Customers can also use the feature to change their wager type to an applicable parlay option. For example, if you bet a three-team parlay of the New York Giants, Cincinnati Bengals and Miami Dolphins to all win their respective games, Edit Bet would either allow you to increase how much you've wagered on the parlay (even after one or more of the three games had kicked off) or it could allow you to deconstruct the single three-team parlay into three different two-team parlays, thereby hedging your risk. Edit Bet is available when the Cash Out feature is available, and utilizes whatever the current Cash Out value of the wager is.

Our experience operating in the most rigorous licensed jurisdictions across the world also gives us the necessary expertise to protect customers. We believe these customer protections to be a bedrock principle of the types of Sustainable Markets we've advocated for elsewhere in this application response.

This includes ensuring that no underage, prohibited or voluntarily excluded person is able to place a wager, detecting and reporting suspicious wagering activity to the proper authorities, and addressing responsible gaming prevention.

Ensuring underage, prohibited and excluded persons are not able to wager

If awarded a mobile sports wagering license, bet365 will adopt a robust customer verification process that uses an appropriate third-party service to ensure no underage persons will be able to wager. We'll utilize personal data collected at registration in order to verify the customer's identity and confirm they are of legal age to wager. Where we are unable to verify the customer's identity through electronic data sources, we'll then require customers to upload identity documentation issued by a reputable source.

Further, bet365 will record the customer's acceptance of our terms and conditions to participate in mobile sports wagering in addition to the customer's certification that the information provided to the operator by the individual who registered is accurate.

In most jurisdictions, we will typically either receive a regulator-provided exclusion list on a daily basis, or we will access an approved exclusion database service. The customer details and information contained in these services will be checked against the bet365 customer database and, as an example, the customer account statuses can be updated in the following way:

Detecting and reporting suspicious wagering activity

bet365 will maintain a robust process for the detection of suspicious wagering activity and will report such detected activity in line with the Commission's defined reporting requirements.

In order to identify suspicious behavior, bet365 will employ a number of controls, including checking for abnormal wagering activity and non-standard account type creation.

Some types of wagering that bet365 may consider suspicious include wagering activity that has been or can be linked to an entity previously known to bet365 as suspicious or high-risk, wagering activity on a market that is significantly out of line with our trading team's assessment of the market, or wagering activity that has no reasonable explanation based on publically available information.

Further, bet365 is currently a member of Sports Wagering Integrity Monitoring Association (SWIMA). The role of SWIMA is to protect mobile sports wagering operators, their customers and sporting bodies from wagering-related corruption by deterring match-fixing, market manipulation and corruption, sharing industry best practice techniques and by providing an effective early warning system to identify integrity issues.

In Europe, we have also been a long-time member of the International Betting Integrity Association (IBIA), which was formerly known as the European Sport Security Association (ESSA), and which plays a similar role to SWIMA. bet365 contributes to both SWIMA and the IBIA by providing information relating to unusual or suspicious wagering activity.

If any of our findings result in knowledge or suspicion of suspicious activity, we will apply appropriate restrictions to the account in question and will submit a report detailing any suspicious activity. This is separate form and in addition to any federally mandated Suspicious Activity Reports (SAR).

Addressing Responsible Gaming

Our tiered approach to responsible gaming will allow bet365 in New York to engage customers as it does elsewhere -- in a way that is appropriate and effective depending on their individual circumstances and needs. This tiered approach consists of:

- Marketing and advertising bet365's products in a socially responsible manner
- Implementing the aforementioned measures to prevent underage wagering
- Regularly providing customers with information that raises awareness about responsible gaming and helps them stay in control of their wagering
- Providing tools for customers to manage and restrict their wagering activity, including allowing them to set limits on how long they can be logged into their account for, and how much money they can deposit or wager in a given period
- Proactively analyzing customer data to help identify customers who may be at risk of or experiencing harm, and strategies for interaction
- Providing robust self-exclusion options for customers who want to stop wagering
- Conducting regular training and awareness programs for customer-facing employees that allow them to provide responsible gaming support and advice

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:

6.3.A WAGER ACCEPTANCE

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EXHIBIT 14

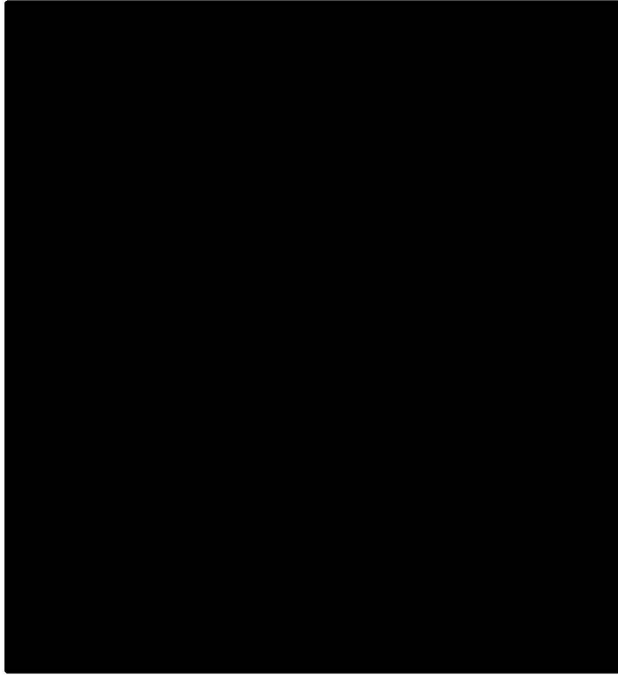


EXHIBIT 15





EXHIBIT 16

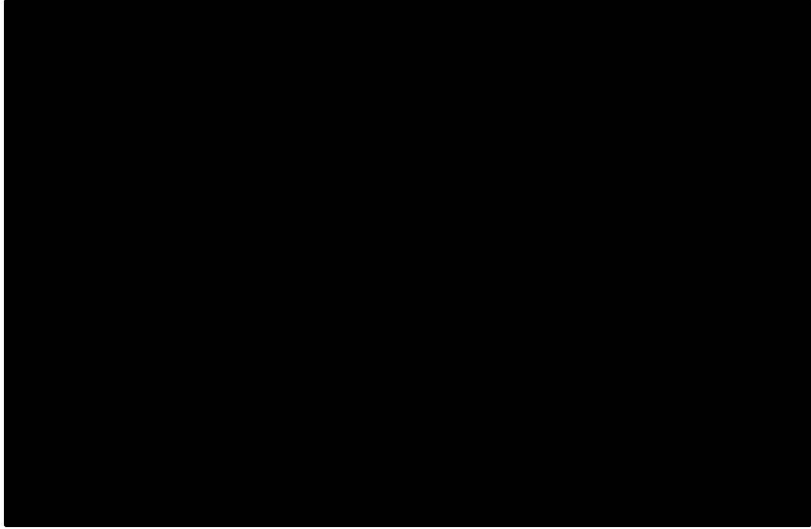


EXHIBIT 17

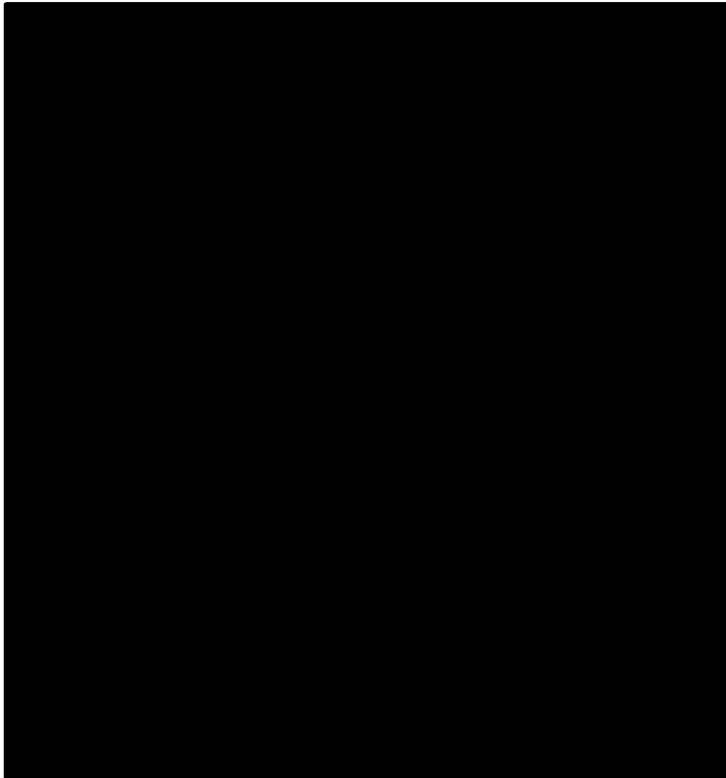
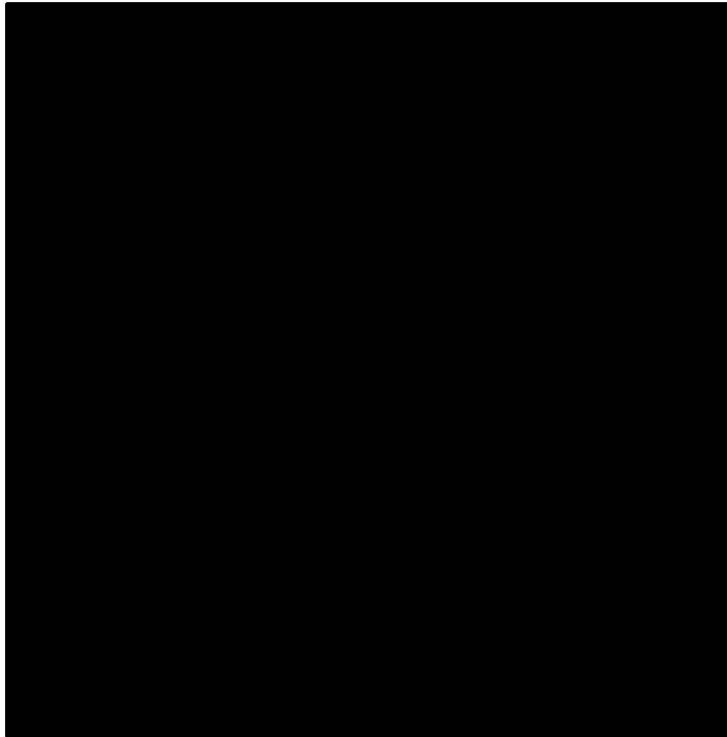


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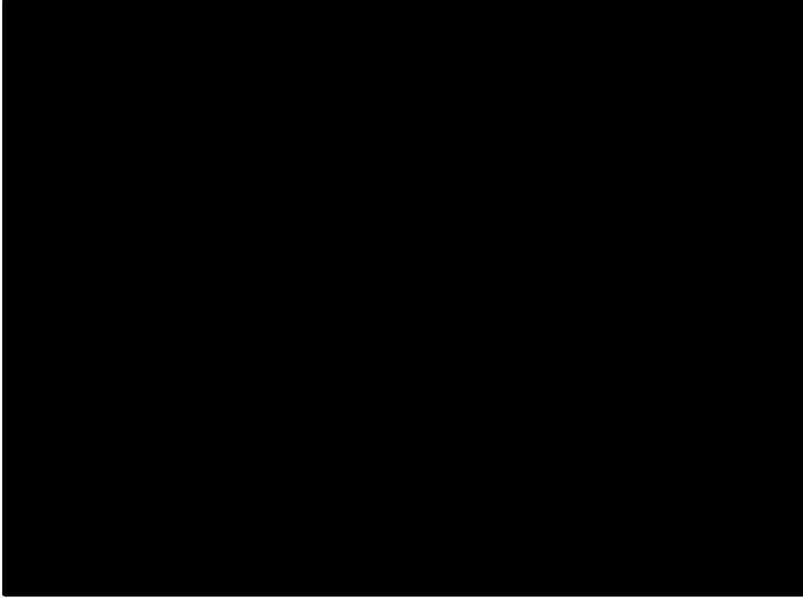
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EXHIBIT 19



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EXHIBIT 20



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EXHIBIT 21

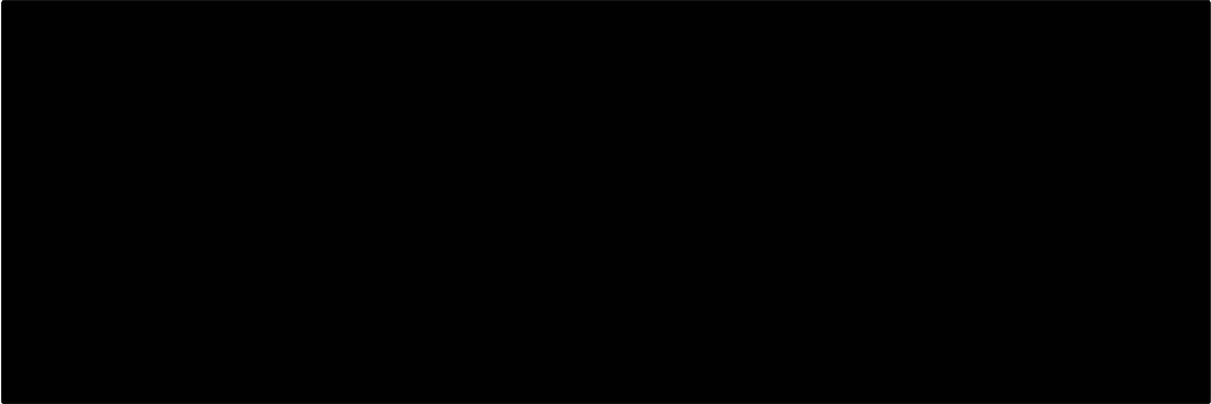
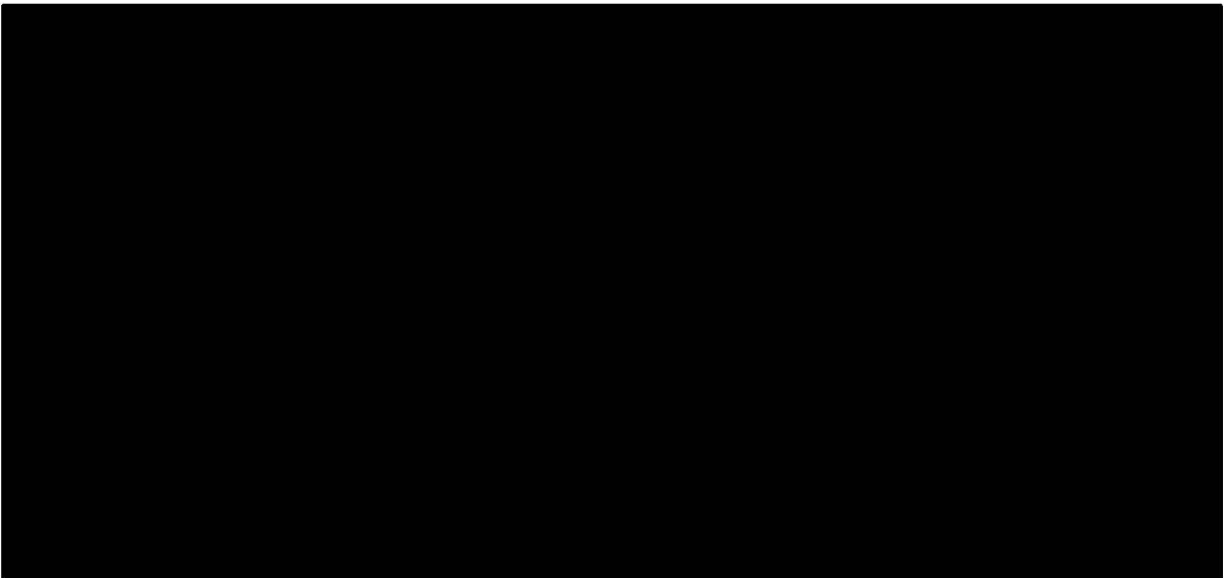


EXHIBIT 22



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**VERIFICATION OF INFORMATION PROVIDED BY AUTHORIZED SPORTS BETTORS
OPENING A NEW ACCOUNT**

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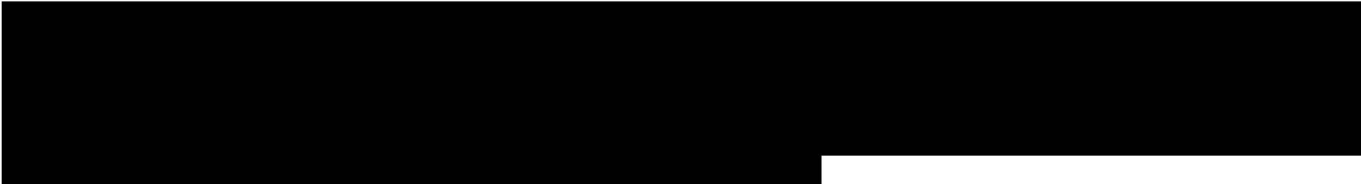
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6.3.D

THE SYSTEMS USED TO ENSURE THAT AUTHORIZED SPORTS BETTORS ARE PHYSICALLY LOCATED WITHIN THE STATE OF NEW YORK WHILE PLACING A WAGER

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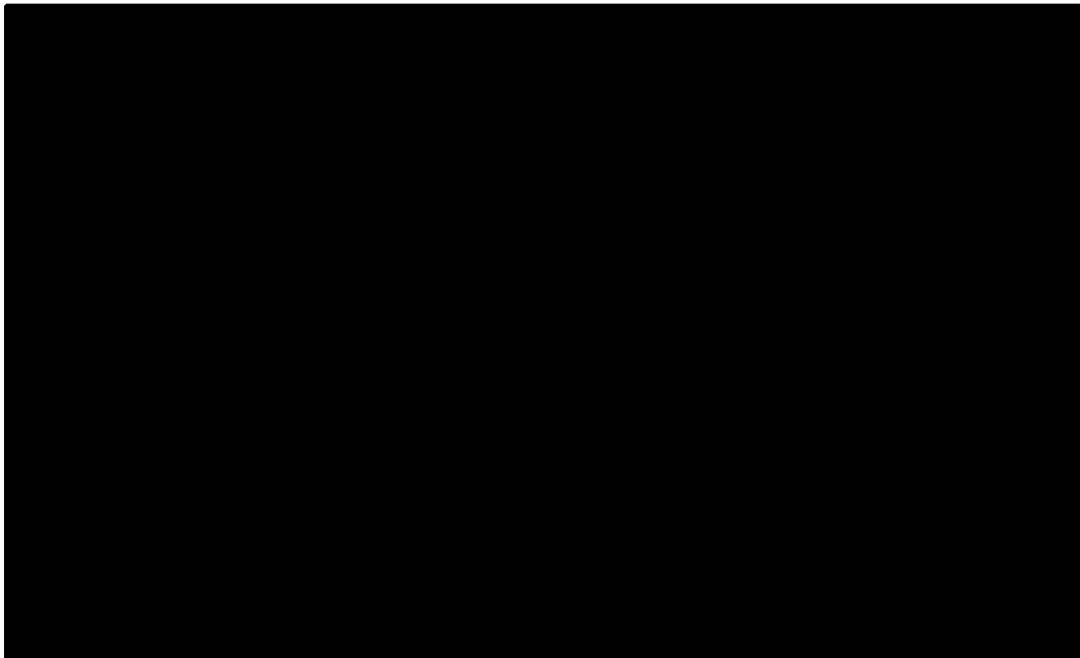
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EXHIBIT 23

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EXHIBIT 25

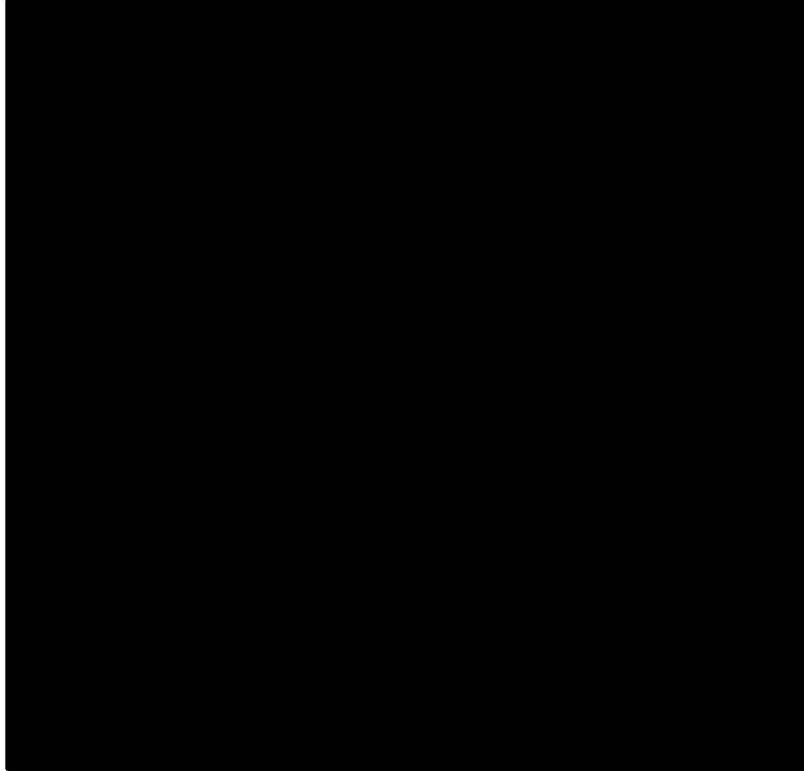


EXHIBIT 26



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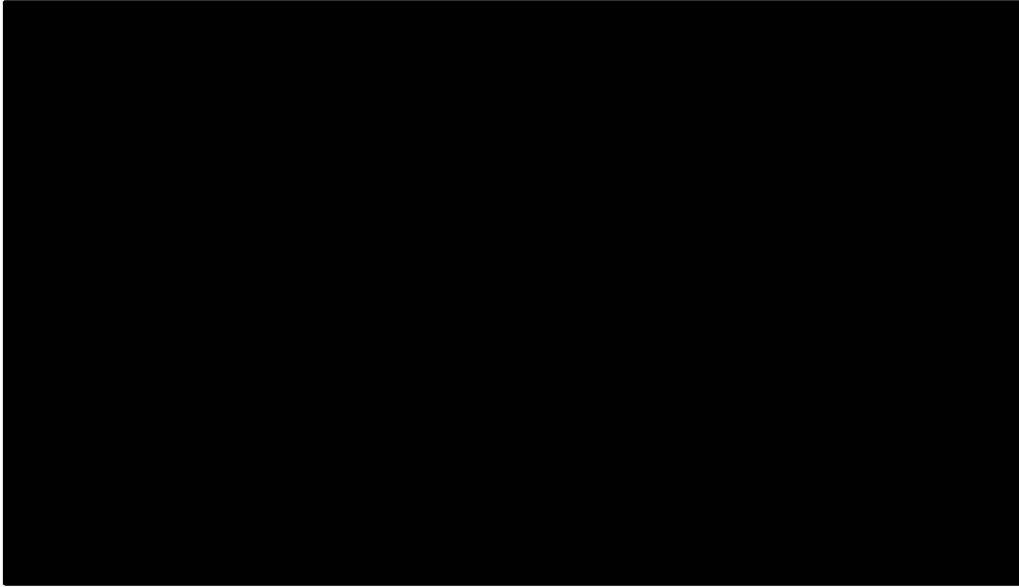
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EXHIBIT 27



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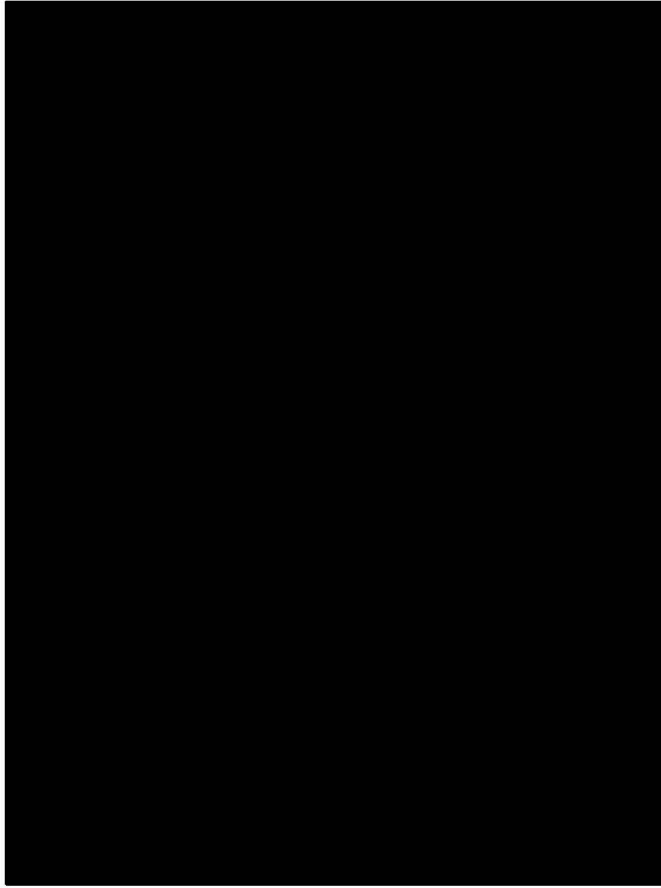
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EXHIBIT 28



6.3.E

THE TECHNOLOGY TO ENSURE THAT ANY WAGER IS ACCEPTED THROUGH EQUIPMENT PHYSICALLY LOCATED AT A LICENSED GAMING FACILITY IN THE STATE

[REDACTED]

EXHIBIT 29

[REDACTED]

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6.3.F

DESCRIPTION AND LOCATION OF REDUNDANT SERVERS, IF ANY

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INTEGRITY MONITORING AND REPORTING, INCLUDING ANY CURRENT AFFILIATIONS RELATED TO INTEGRITY MONITORING

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6.4 CAPACITY TO BRING AUTHORIZED SPORTS BETTORS TO PLATFORM

How can the Applicant rapidly effectuate the commencement of mobile sports wagering / How soon from the award of a mobile sports wagering license will the Applicant start accepting mobile sports wagers

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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6.5 WORKFORCE DIVERSITY

6.5.A THE ORGANIZATION'S POLICY ON WORKFORCE DIVERSITY

Hillside (New York) LLC and the bet365 group of companies are committed to fostering a diverse workplace where people feel respected and valued regardless of age, disability, gender, marital status, pregnancy or maternity, race, religion and belief, sex or sexual orientation.

As evidence of the group's commitment to fostering a diverse workplace the bet365 Group's policies encouraging equal opportunity and prohibiting harassment of any kind are attached for reference as Appendices C1 and C2, respectively.

6.5.B

WORKFORCE DEMOGRAPHICS DEMONSTRATING THE ORGANIZATION'S CURRENT WORKFORCE DIVERSITY

The workforce that would support operations undertaken pursuant to authorization to offer sports wagering in the state of New York and our base of operations in the U.S. would be housed in our New Jersey office. That office currently has a staff of 100 made up of traders, customer service and other supporting personnel. The demographics of that office using the EEO1 model for gender and race/ethnicity is as follows:

EXHIBIT 35

bet365 Workforce Demography	
Gender	
Male	79%
Female	20%
Non-binary	1%
Race/Ethnicity	
Hispanic	4%
White	79%
Black or African American	12%
Native Hawaiian or Pacific Islander	0%
Asian	2%
Native American or Alaska Native	0%
Two or more races	3%

6.5.C

EFFORTS THE APPLICANT AND OPERATORS WILL UNDERTAKE TO FOSTER WORKFORCE DIVERSITY AS IT RELATES TO OPERATIONS UNDERTAKEN PURSUANT TO A LICENSE, IF AWARDED

bet365 values diversity in the workplace and understands the value having a diverse workforce has when our services are offered to a diverse population. The starting point for fostering a diverse and inclusive workforce in any organization is with its hiring policies. In conjunction with its previously stated equal employment policy, bet365 is committed to casting a wide net in its recruiting practices in order to welcome applicants of all ages, genders, races, religions, ethnicities, sexual orientations and other distinguishing characteristics. As evidence of this commitment bet365 has posted and will continue to post its job openings and recruitment efforts on the following job boards:

Black Career Women's Network – A resource designed to bridge the gap of support for professional development and mentor access by providing curated tools, programs, and a strong community network for women to strategically manage their careers, navigate the workplace and thrive professionally.

WorkplaceDiversity.com – A job site for organizations that value diversity in the workplace that values many diverse groups rather than focusing primarily on one specific group. Through utilizing the services of workplacediversity.com, bet365 will leverage the other more-focused job boards that fall under their umbrella.

Those sites are:

- Veteransconnect.com
- Outandequal.com
- LGBTconnect.com
- Disabilityconnect.com
- Hispanicdiversity.com

6.6 OTHER FACTORS IMPACTING REVENUE TO THE STATE

The Applicant shall provide a narrative of any other factors the Applicant believes the Commission should take into consideration when evaluating other factors that could impact revenue from mobile sports wagering paid to the state

Additional factors of bet365's plans for entering the New York mobile sports wagering market will enhance the overall amount of revenue to the state.

One element is increased channelization. Our high customer payouts and proactive customer protections will reduce harm and increase the avidity of customers who are attracted to better wagering value. This doesn't just mean that they'll wager with us instead of our legal, licensed competitors. It means they will wager with us instead of the illegal market. This is especially true in the event that New York only authorizes two or three mobile sports wagering platforms, as customers will effectively only have two or three pricing and odds choices to choose from in the legal market, and hundreds of offshore, illegal operators to choose from. We have a proven track-record of driving customers from the illegal market into our marketplace. When this happens in New York it will ultimately lead to more money for the state.



EXHIBIT 36

NY BASED COMPANIES THAT BENEFIT FROM BET365'S MARKETING SPEND

Advertising Agencies	Data Providers	Leagues	NY Teams	
<th>Video & Audio Media Companies</th>				Video & Audio Media Companies

6.7 REVENUE SHARING AGREEMENTS

If applicable, an Applicant shall provide an executed copy of any agreement that provides for the sharing of mobile sports wagering revenue with a Native American tribe


We have no such applicable agreements in place.

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.

The sections that follow are meant to cover the internal control requirements established for a mobile sports wagering operator as defined in Part 5330.8. We feel that these sections contain valuable information for the Commission to take into consideration when evaluating our technical and operational capabilities as a mobile sports wagering operator.

5330.8.A **SUBMISSION. EACH MOBILE SPORTS WAGERING LICENSEE SHALL SUBMIT TO THE COMMISSION FOR APPROVAL, INTERNAL CONTROLS FOR ALL ASPECTS OF MOBILE SPORTS WAGERING OPERATIONS PRIOR TO COMMENCING OPERATIONS. THE SUBMISSION OF INTERNAL CONTROLS SHALL BE ORGANIZED TO CORRESPOND TO THE SUBDIVISIONS SET FORTH IN THIS SECTION**



5330.8.B **SYSTEM REQUIREMENTS. INTERNAL CONTROLS FOR SYSTEM REQUIREMENTS SHALL ADDRESS:**

5330.8.B.1 USER ACCESS CONTROLS



5330.8.B.2 A DESCRIPTION OF SEGREGATION OF DUTIES

[Redacted text block]

[Redacted text block]

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[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

5330.8.B.3 PROCEDURES FOR IDENTIFYING AND REPORTING FRAUD AND SUSPICIOUS CONDUCT OR ACTIVITY

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

5330.8.B.4 PROCEDURES TO PREVENT SPORTS WAGERING BY PATRONS PROHIBITED FROM SPORTS WAGERING

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

EXHIBIT 37

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

5330.8.B.5 A DESCRIPTION OF ALL INTEGRATED THIRD-PARTY SYSTEMS

[REDACTED]

[REDACTED]

EXHIBIT 38

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

5330.8.B.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

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

5330.8.B.7 DESCRIPTION OF THE SECURE METHOD TO CONTROL REMOTE ACCESS TO THE SPORTS WAGERING PLATFORM USING FIREWALLS OR OTHER PROTECTIONS AND MAINTAINING SECURE LOGS

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

5330.8.B.8 ALL DATA SOURCE 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 MAY BE DETERMINED RELIABLY, ACCURATELY, AND TIMELY BY AN ALTERNATIVE DATA SOURCE.



EXHIBIT 39

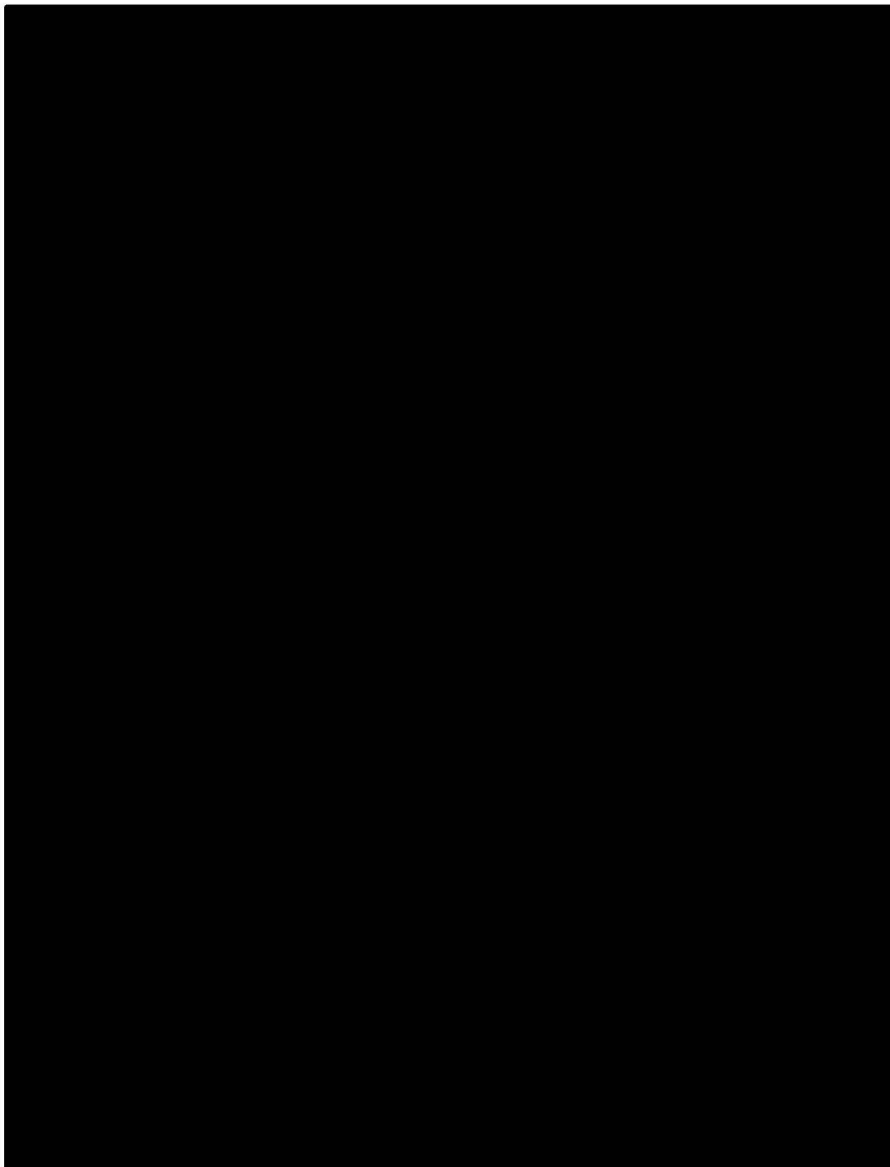
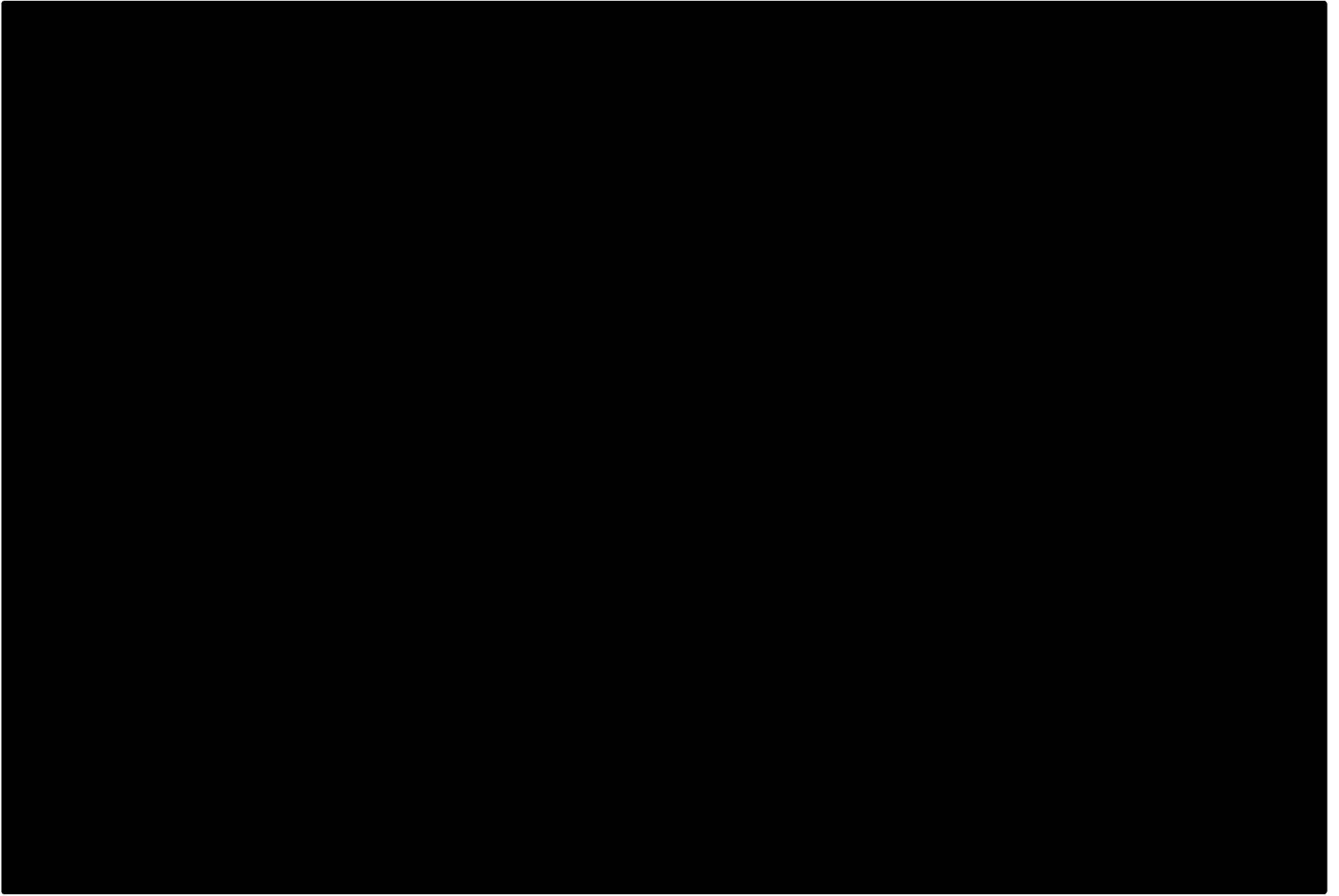


EXHIBIT 40



5330.8.B.9 THE METHOD IN WHICH THE MOBILE SPORTS WAGERING LICENSEE SHALL IMPLEMENT THE STATE-WIDE VOLUNTARY SELF-EXCLUSION DATABASE AND OTHER PROHIBITED SPORTS BETTORS INTO ITS SYSTEM

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

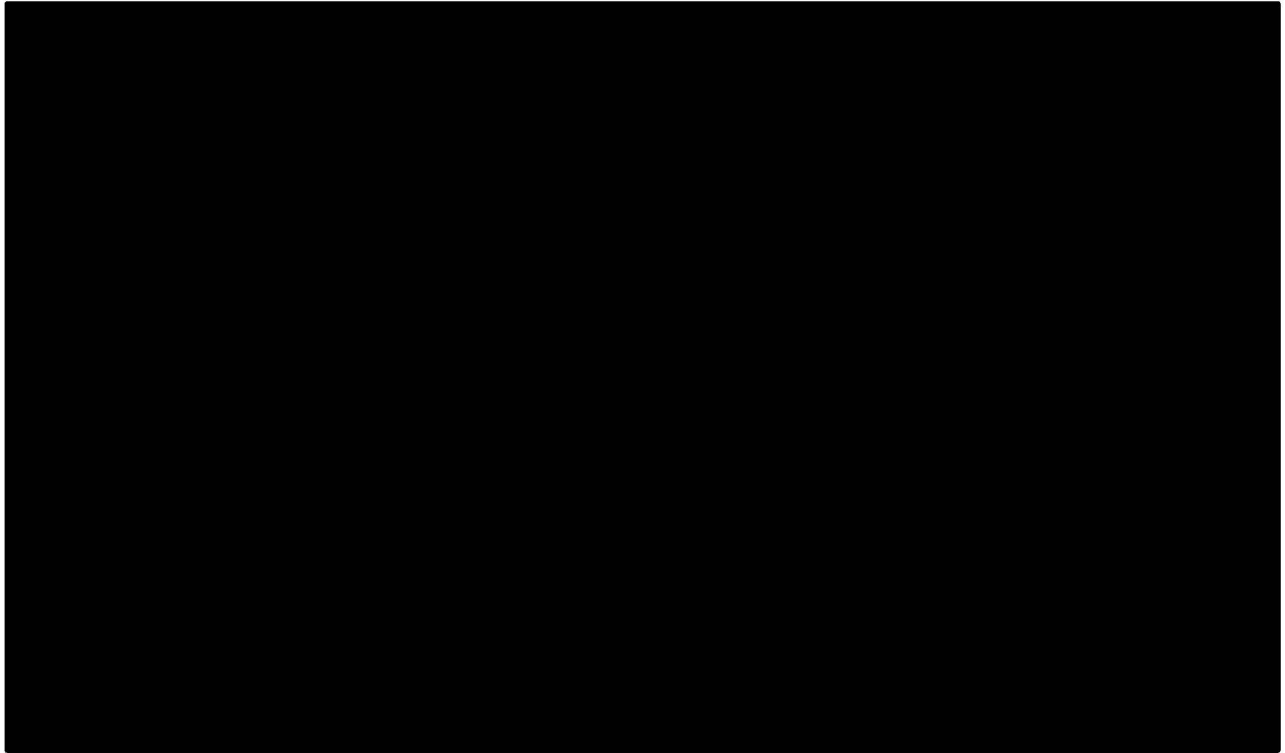
[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

EXHIBIT 41



5330.8.B.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 SOURCES, FREE OF CHARGE TO THE CALLER



EXHIBIT 42

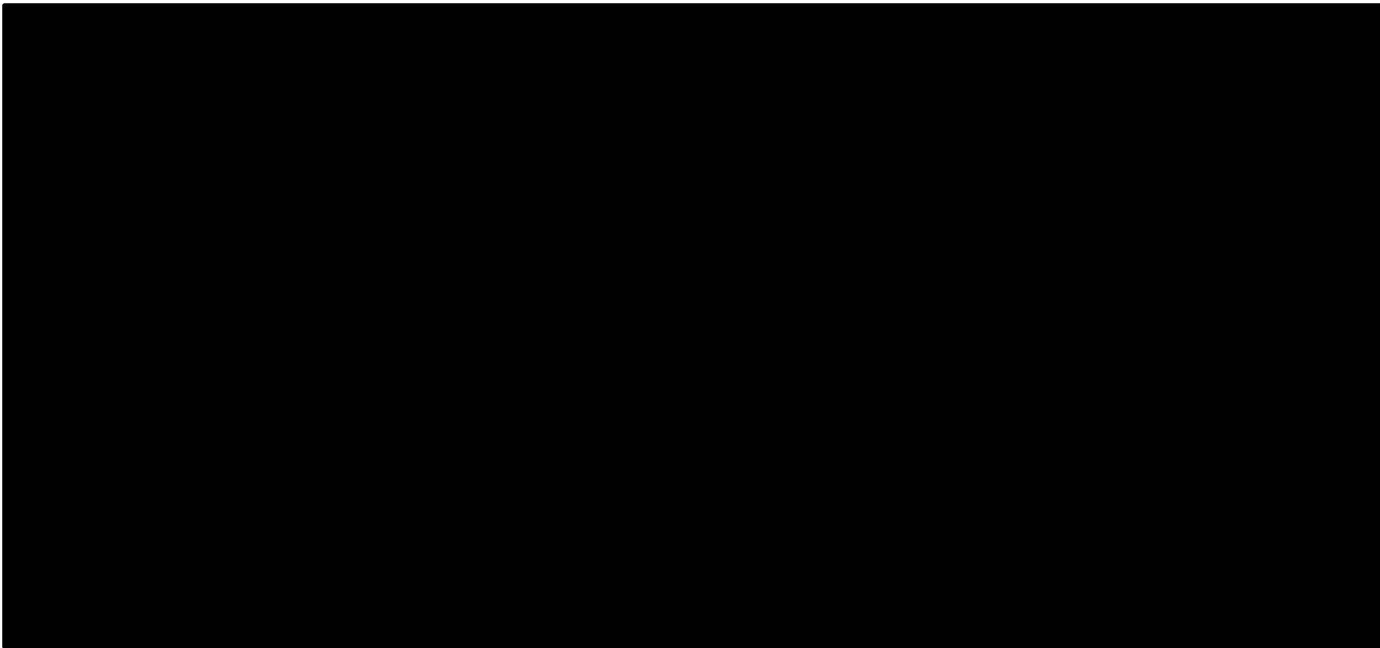


EXHIBIT 43

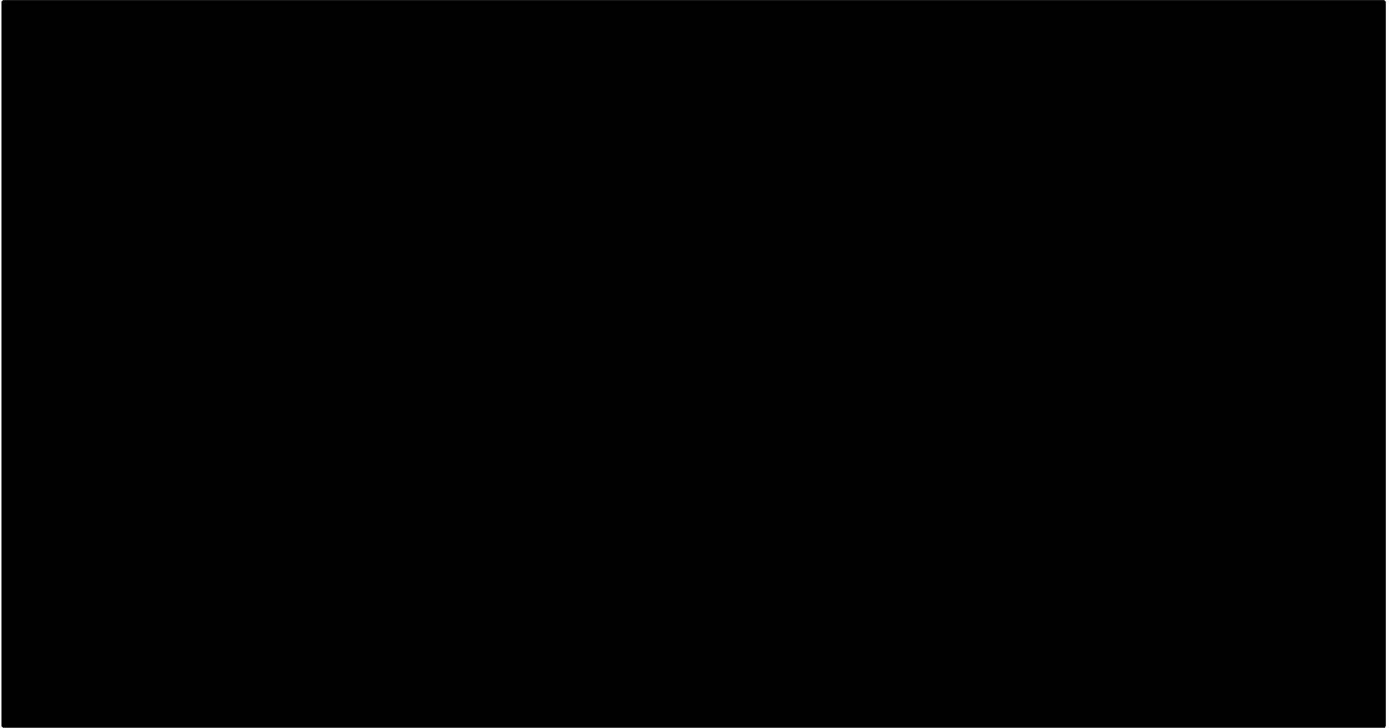


EXHIBIT 44

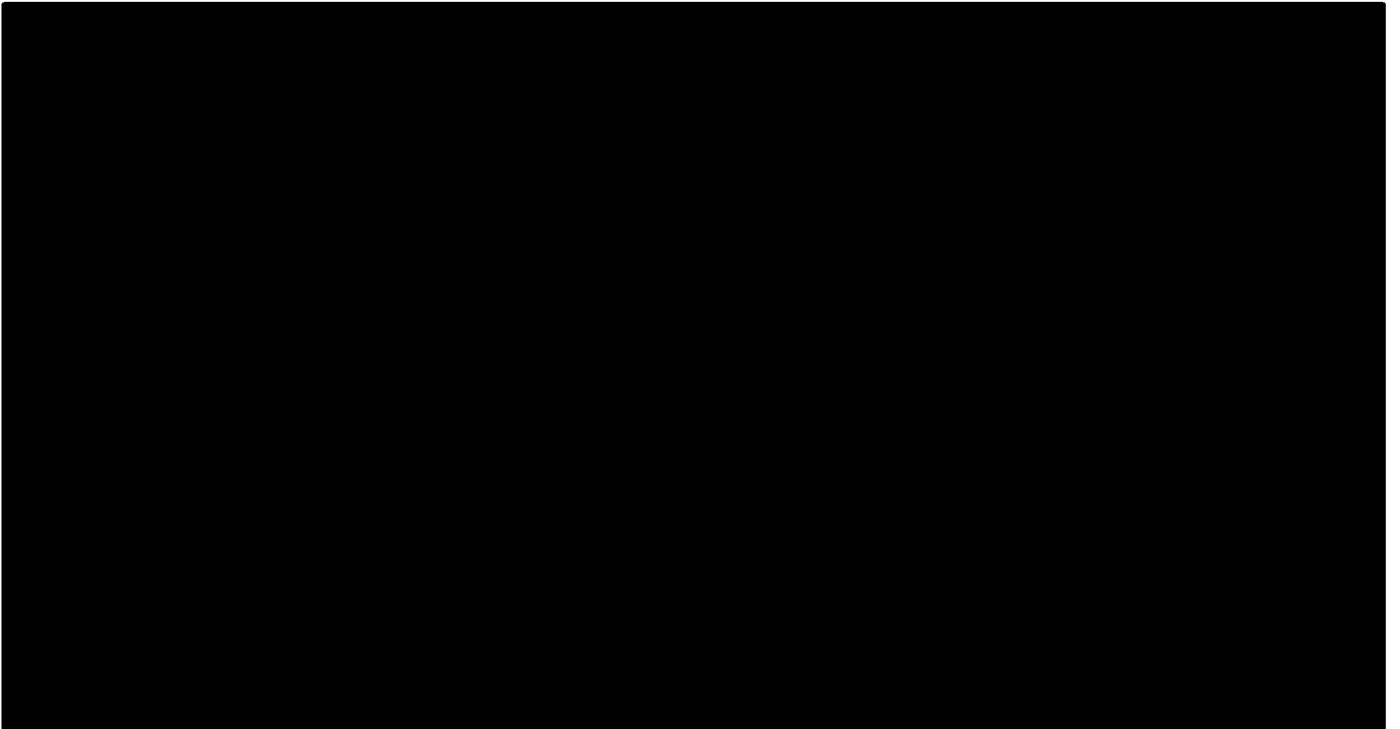


EXHIBIT 45

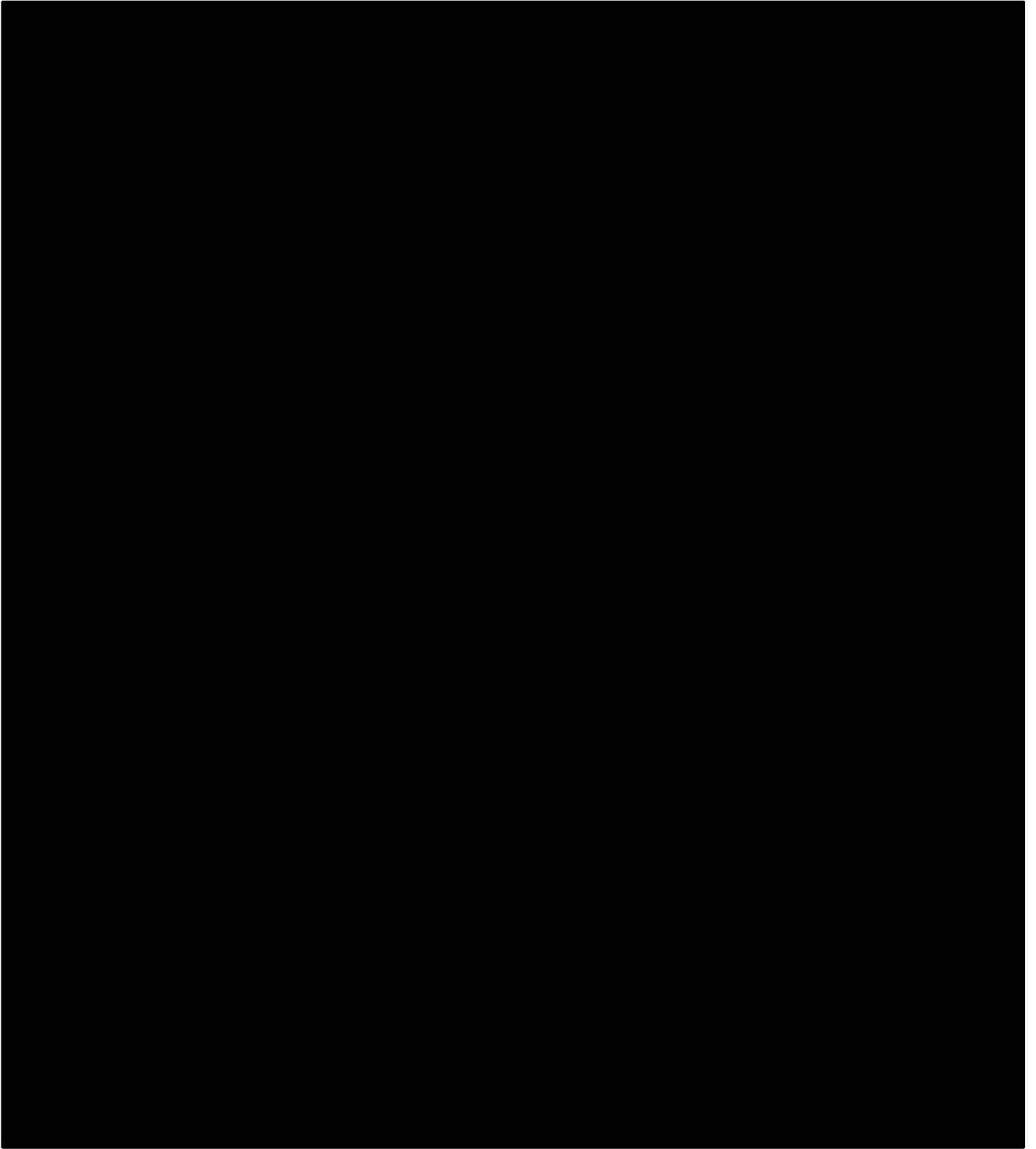


EXHIBIT 46

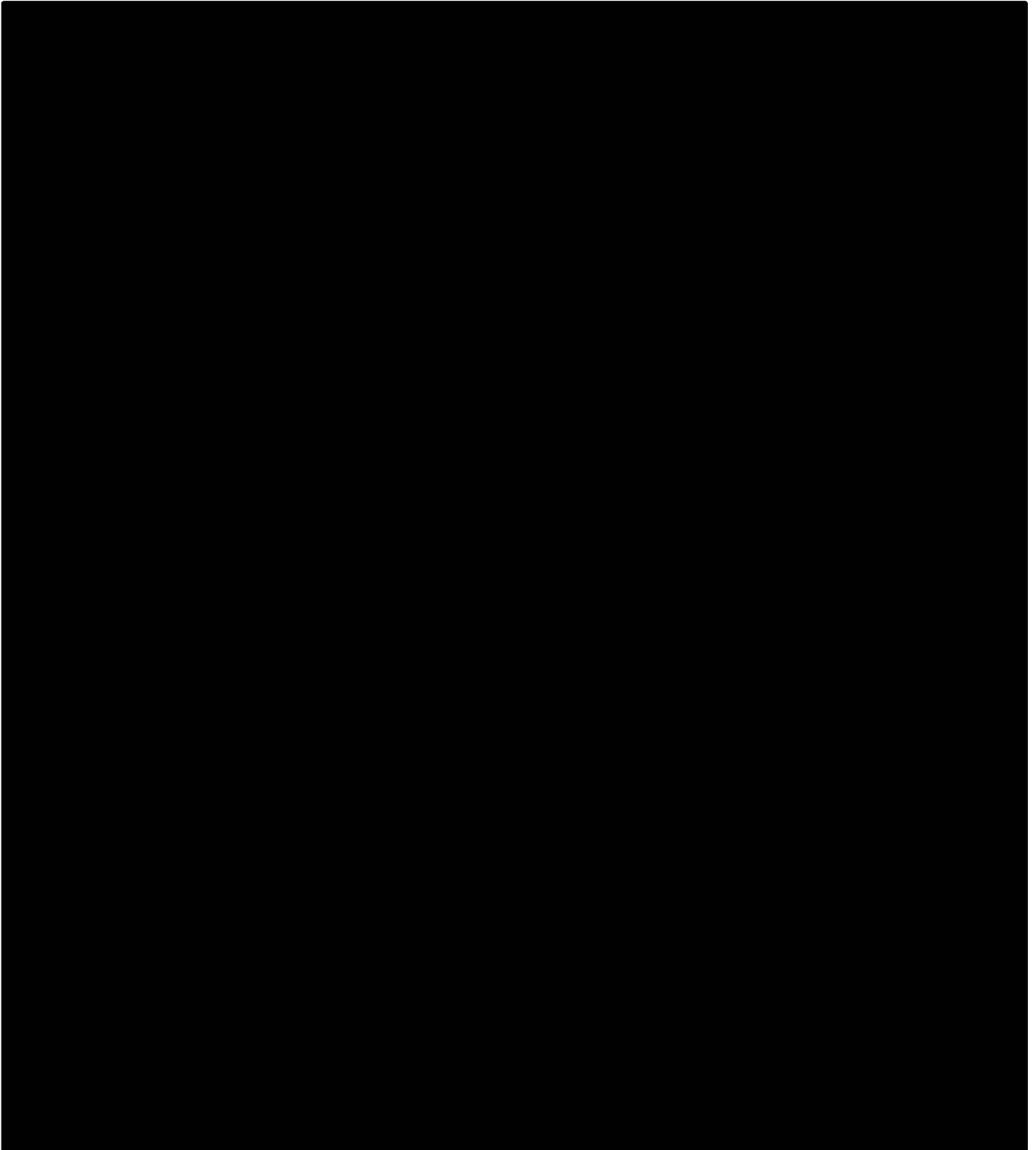
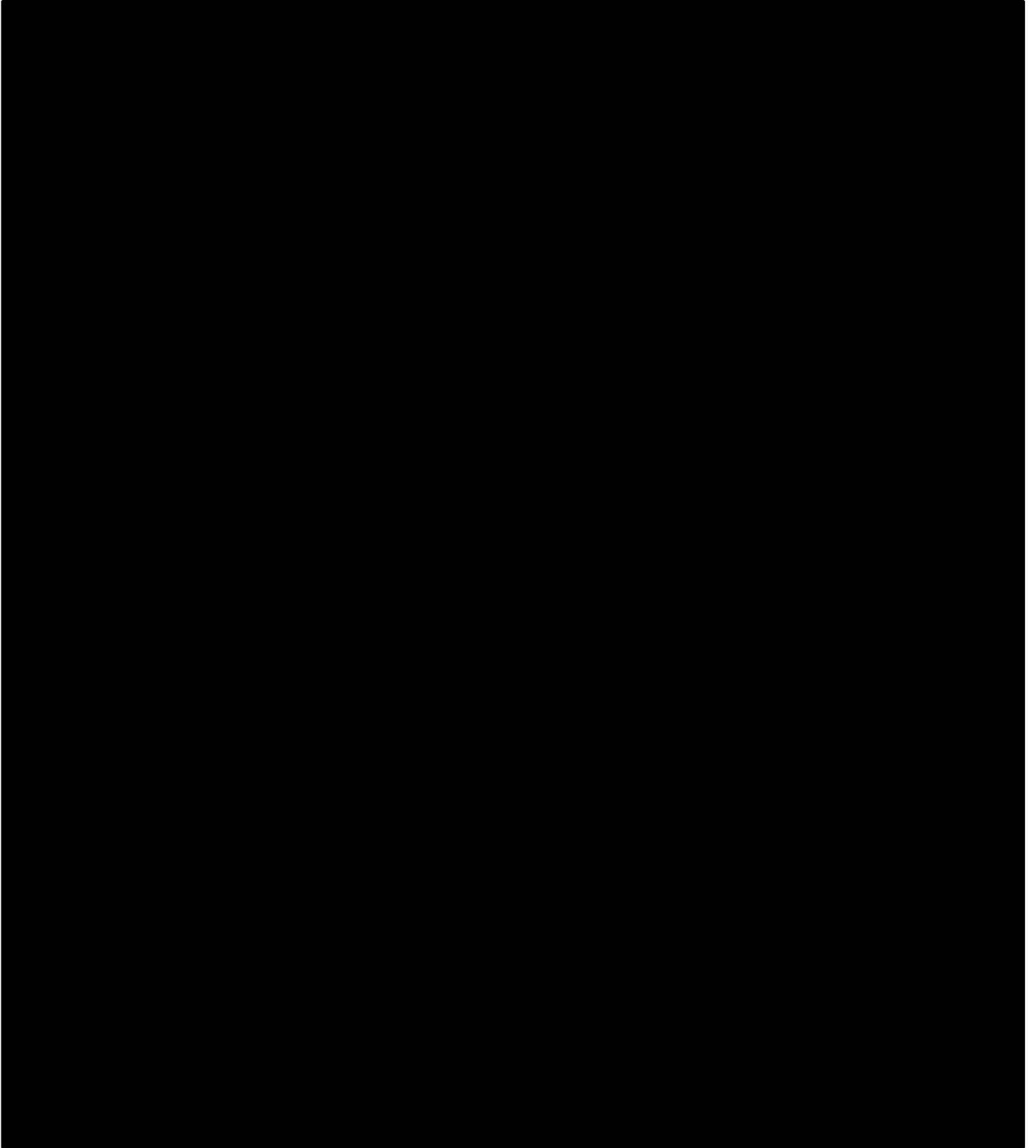


EXHIBIT 47



5330.8.C **AUTHORIZED SPORTS BETTOR ACCOUNT REQUIREMENTS. INTERNAL CONTROLS FOR AUTHORIZED SPORTS BETTOR ACCOUNT REQUIREMENTS SHALL ADDRESS:**

5330.8.C.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)

[REDACTED]

[REDACTED]

5330.8.C.2 THE MULTI-FACTOR AUTHENTICATION METHOD TO BE USED

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

EXHIBIT 48

[REDACTED]

[REDACTED]

EXHIBIT 49

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

5330.8.C.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)



EXHIBIT 50

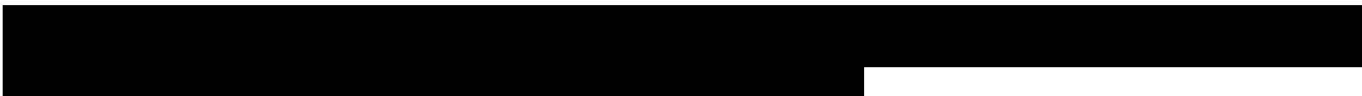
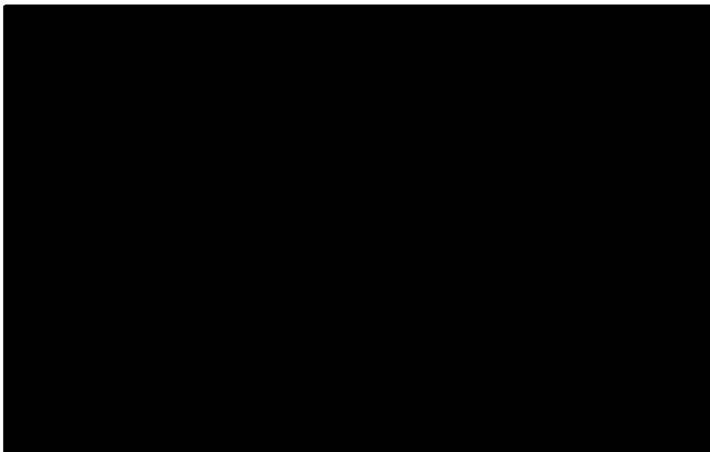
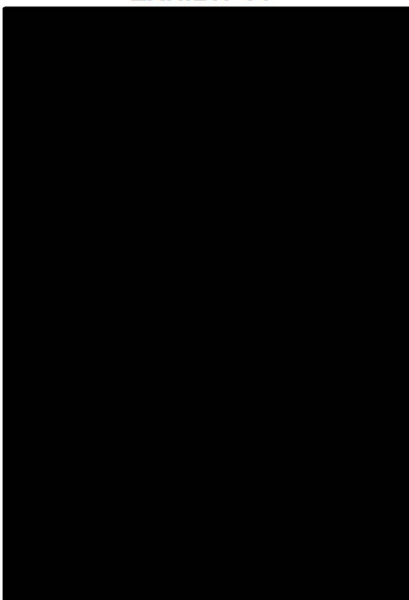


EXHIBIT 51



[Redacted]

[Redacted]

EXHIBIT 52

[Redacted]

5330.8.C.4 CONTROLS IN PLACE TO PROHIBIT ANYONE UNDER THE AGE OF 21 FROM PARTICIPATING IN MOBILE SPORTS WAGERING

[REDACTED]

EXHIBIT 53

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

5330.8.C.5 THE MECHANISM, IF ANY, THE PLATFORM PROVIDER OR SKIN WILL USE TO CREATE A WALLET TO BE USED BY AUTHORIZED SPORTS ACROSS MULTIPLE SKINS ASSOCIATED WITH SUCH PLATFORM PROVIDER



5330.8.C.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

[REDACTED]

[REDACTED]

[REDACTED]

5330.8.C.7 HOW THE MOBILE SPORTS WAGERING LICENSEE INTENDS TO MEET ALL REQUIREMENTS SET FORTH IN SECTION 5330.37 OF THIS PART

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

EXHIBIT 54

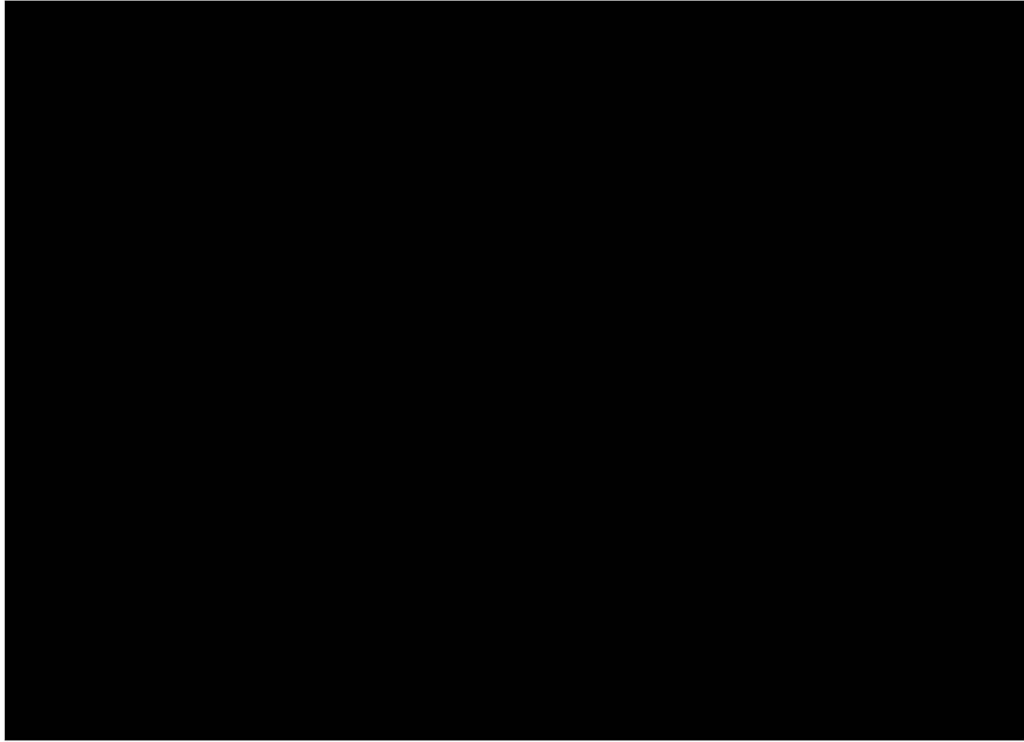


EXHIBIT 55

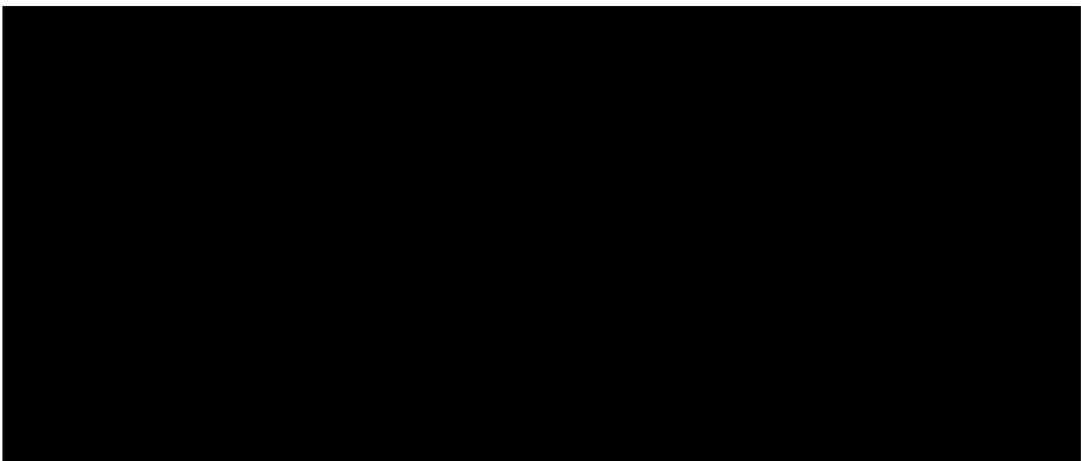


EXHIBIT 56

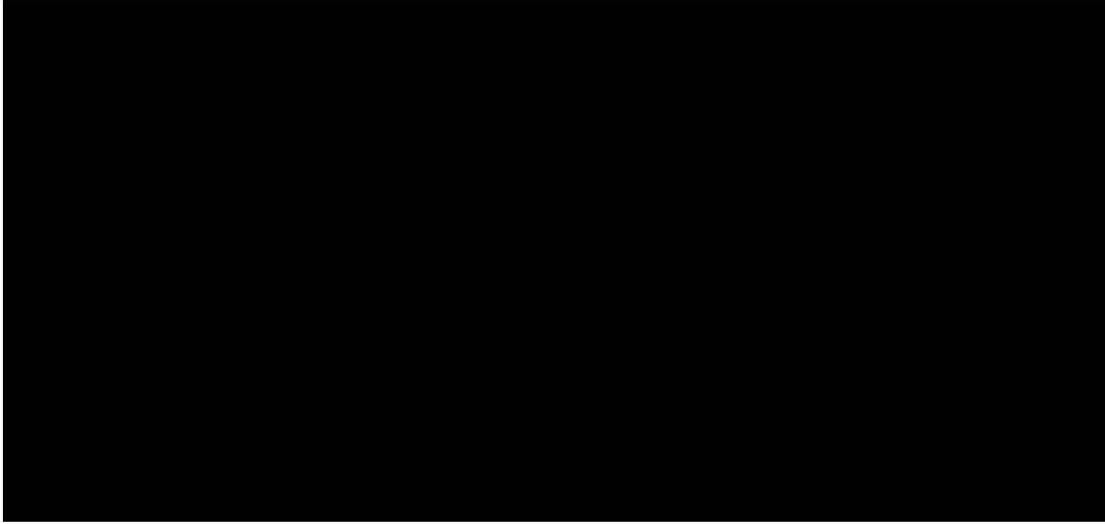
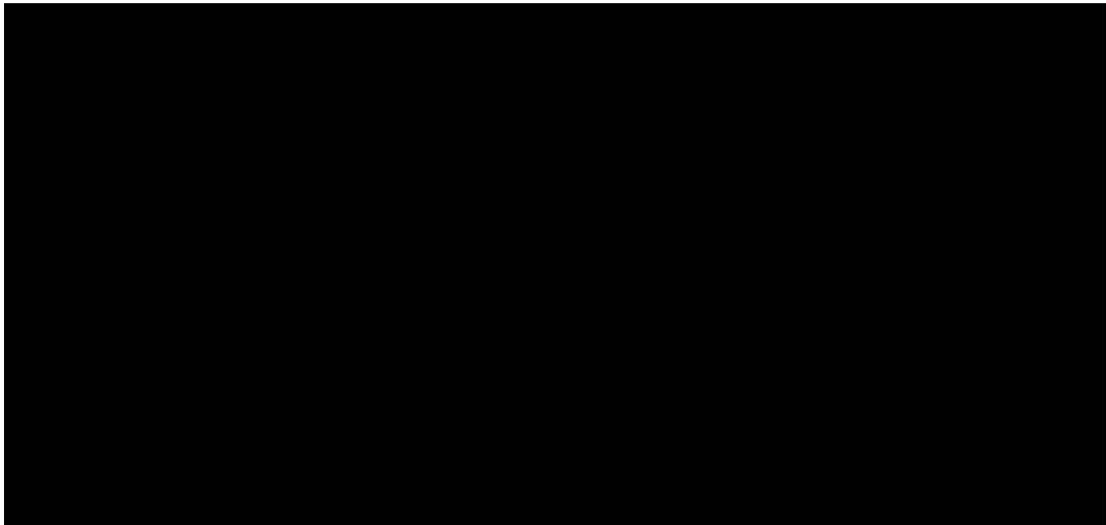


EXHIBIT 57



[REDACTED]

EXHIBIT 58

[REDACTED]

[REDACTED]

EXHIBIT 59

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

EXHIBIT 60

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[Redacted]

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[Redacted]

[Redacted]

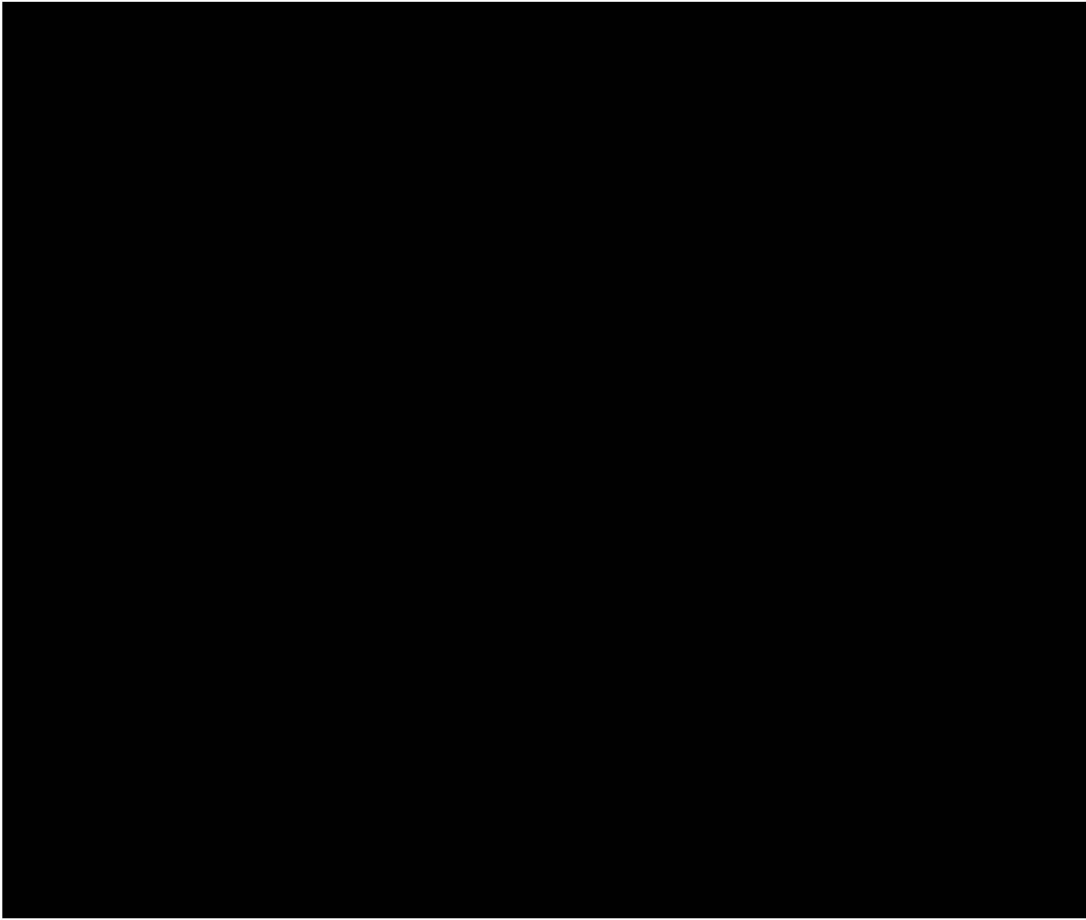
[Redacted]

[Redacted]

[Redacted]

[Redacted]

EXHIBIT 61



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[Redacted text line]

[Redacted text block]

[Redacted text line]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

5330.8.C.8 PROCEDURES FOR ISSUING A FORM W-2G, IF SUCH THRESHOLDS ARE MET

[Redacted]

[Redacted]

[Redacted]

EXHIBIT 62

[Redacted]



EXHIBIT 63

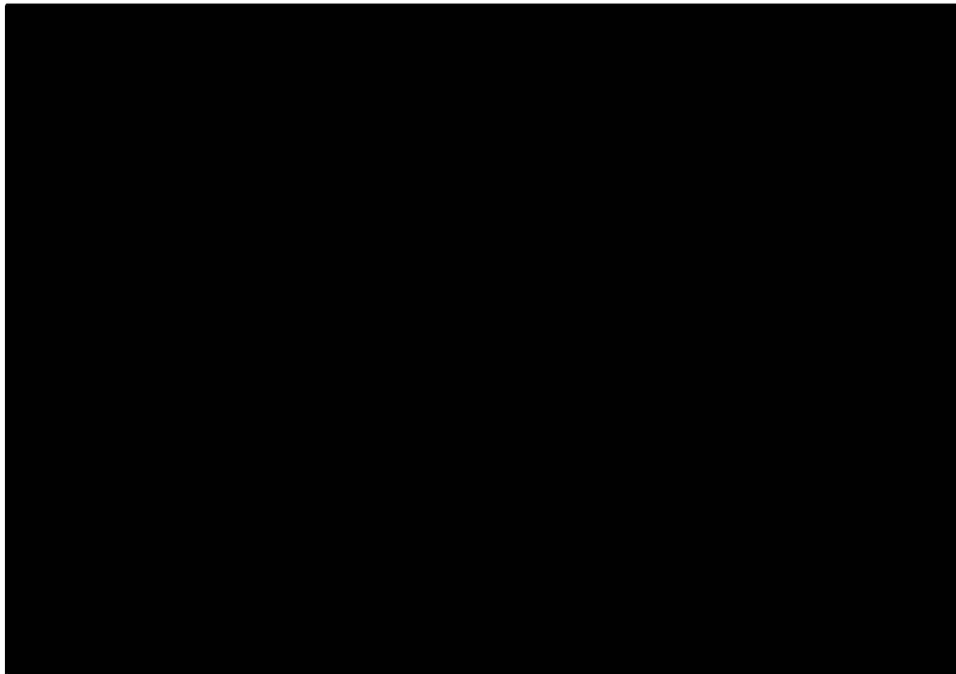


EXHIBIT 64

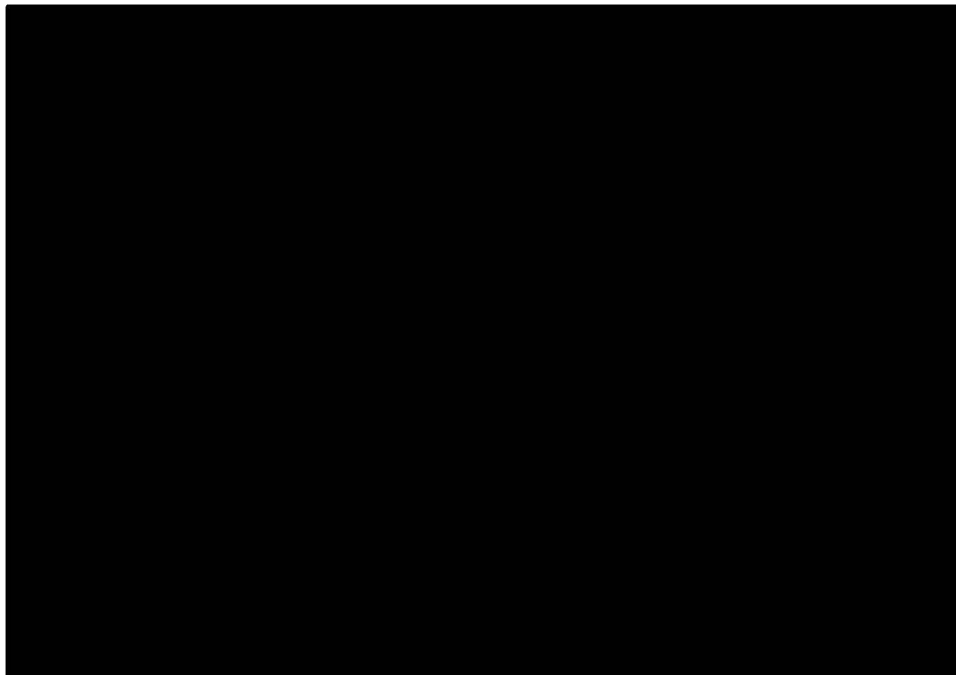


EXHIBIT 65

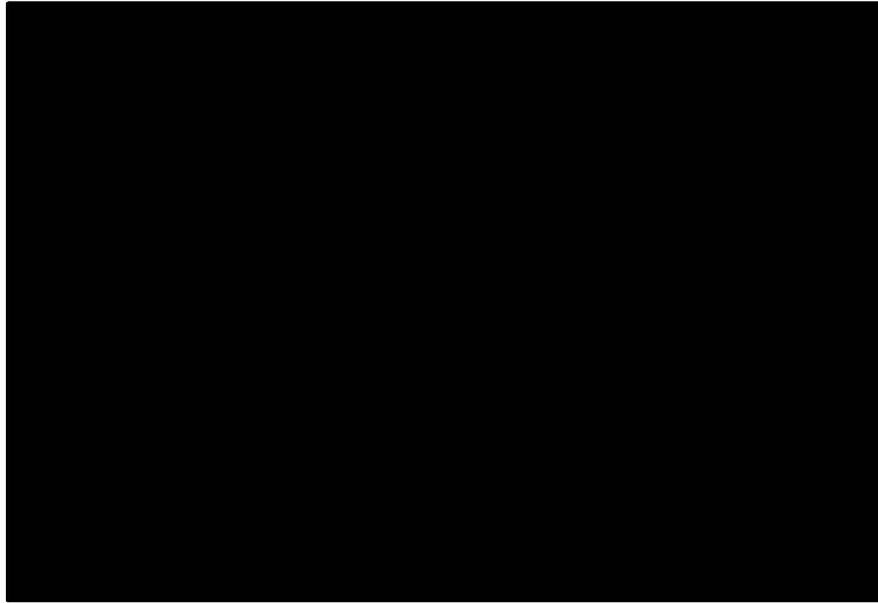
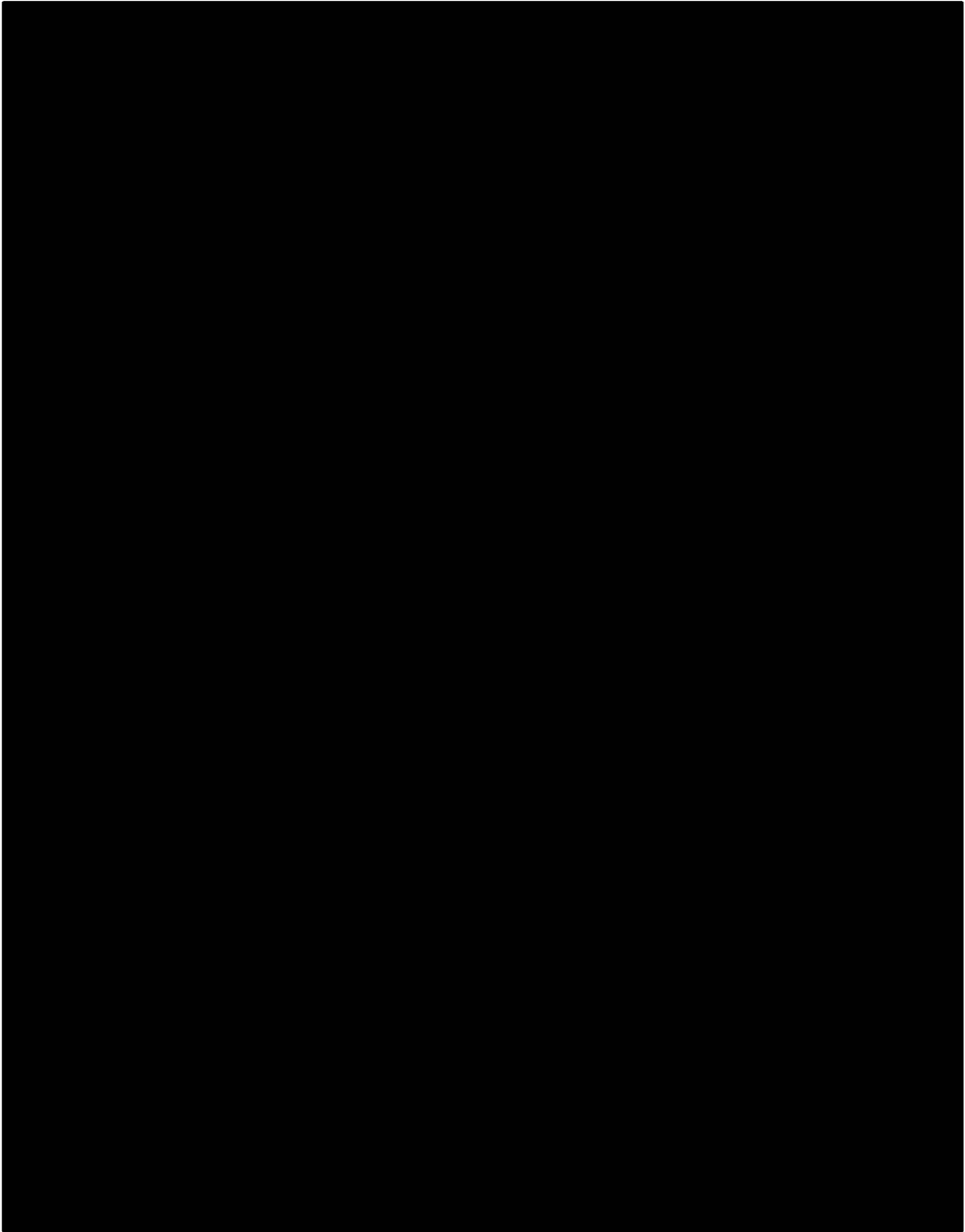


EXHIBIT 66



5330.8.C.10 THE MECHANISM FOR ALLOWING AN AUTHORIZED SPORTS BETTOR TO CLOSE AN ACCOUNT

[REDACTED]

[REDACTED]

EXHIBIT 67

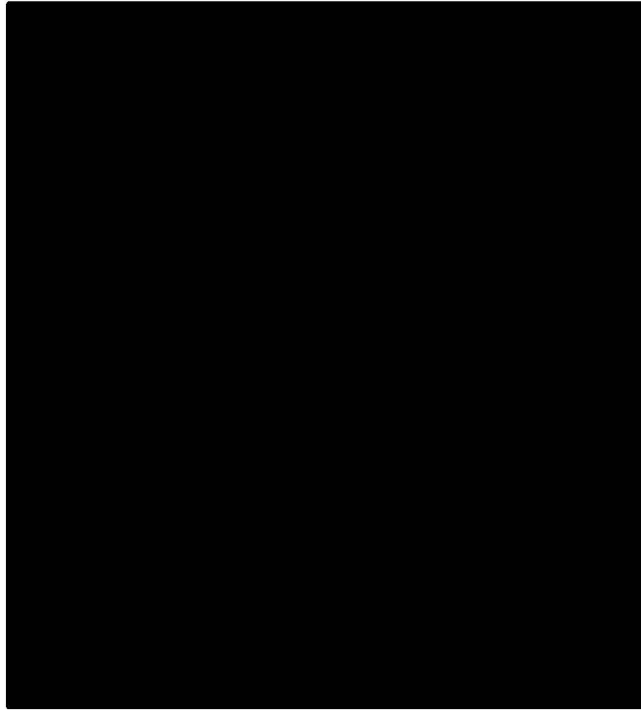
[REDACTED]

EXHIBIT 68

[REDACTED]

[REDACTED]

EXHIBIT 69



5330.8.C.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 CLOSURE SUCH AN 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)

[REDACTED]

[REDACTED]

EXHIBIT 70

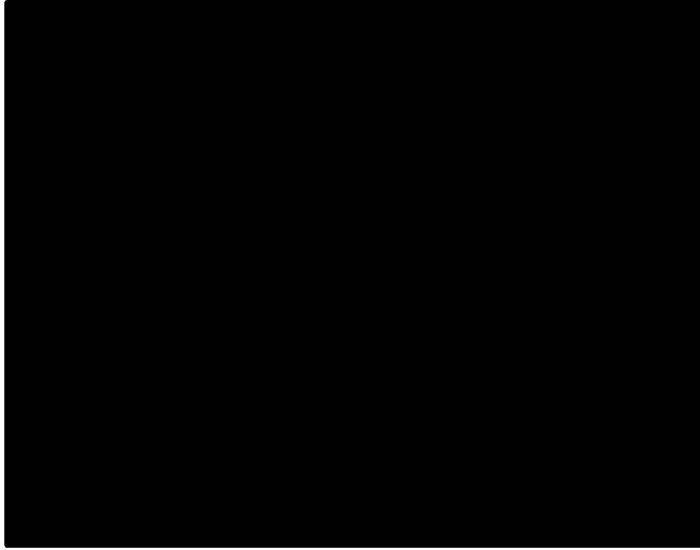
[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

EXHIBIT 71



5330.8.C.12 HOW A DORMANT ACCOUNT IS DEFINED AND WHAT THE PROCESS IS FOR RECONCILIATION OF SUCH ACCOUNTS

[REDACTED]

[REDACTED]

[REDACTED]

5330.8.D **PREVENTION OF CIRCUMVENTION OF SPORTS WAGERING AMOUNT
ACKNOWLEDGMENTS. A SKIN SHALL PROVIDE THE ACKNOWLEDGEMENT 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**



5330.8.E **OPERATIONAL REQUIREMENTS. INTERNAL CONTROLS FOR OPERATIONAL REQUIREMENTS SHALL ADDRESS:**

5330.8.E.1 A DESCRIPTION OF HOW THE SKIN INTENDS TO SEGREGATE SPORTS BETTORS' FUNDS FROM OPERATING FUNDS

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

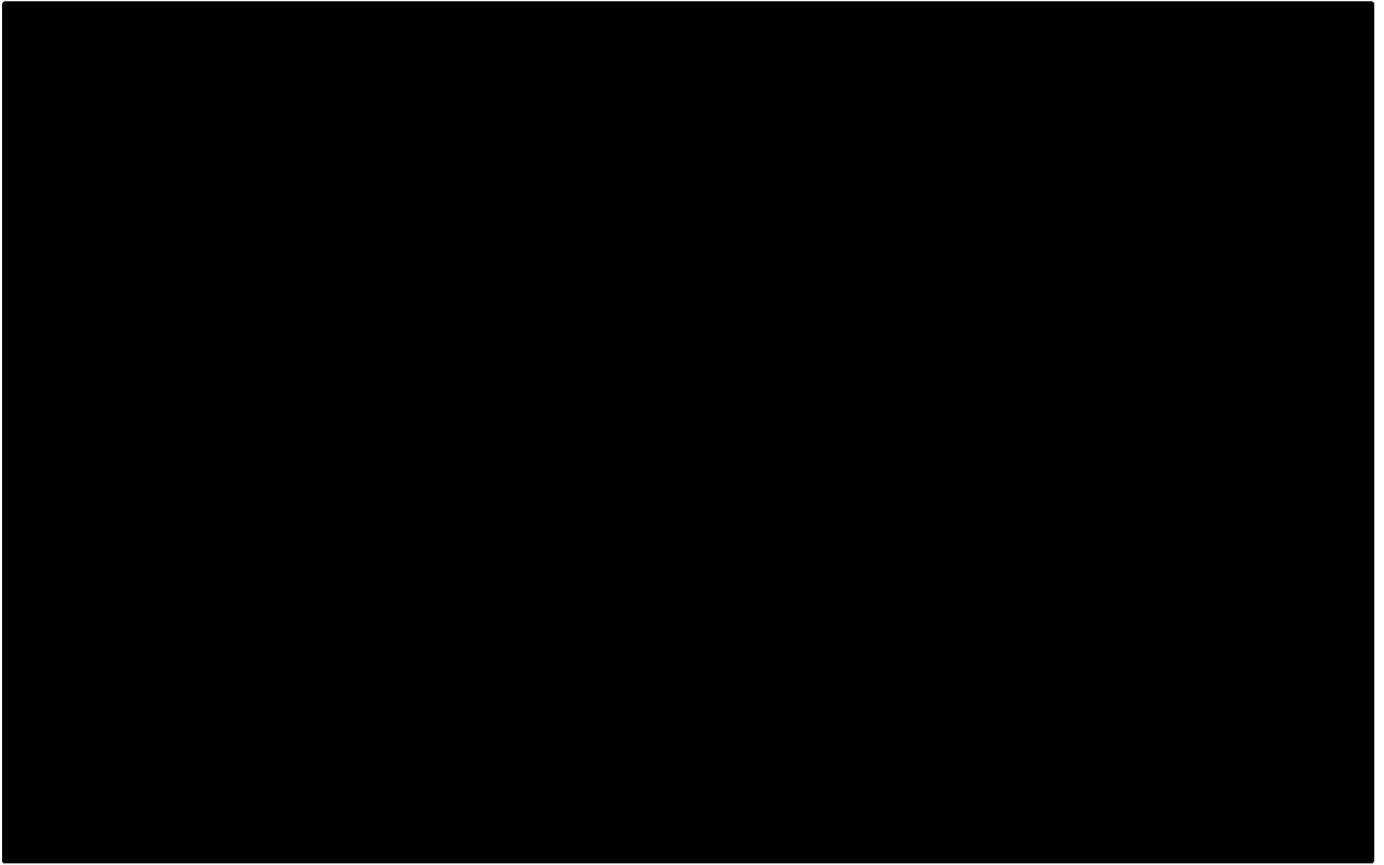
5330.8.E.2 PROCEDURES TO ENSURE NO SPORTS WAGERING SHALL BE BASED ON A PROHIBITED SPORTS EVENT



EXHIBIT 72



EXHIBIT 73



[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

5330.8.E.4 A DESCRIPTION OF THE MONITORING SYSTEM THAT IDENTIFIES AND REPORTS SUSPECTED STRUCTURED SPORTS WAGERS AND UNUSUAL OR SUSPICIOUS WAGERING ACTIVITY

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

5330.8.E.5 PROCEDURES IN PLACE TO ENSURE NO SPORTS WAGERING SHALL BE BASED ON A PROHIBITED SPORTS EVENT



5330.8.E.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

[REDACTED]

[REDACTED]

[REDACTED]

5330.8.E.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

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

5330.8.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:**

5330.8.F.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

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

EXHIBIT 74

[REDACTED]

EXHIBIT 75

[REDACTED]



5330.8.F.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

[REDACTED]

[REDACTED]

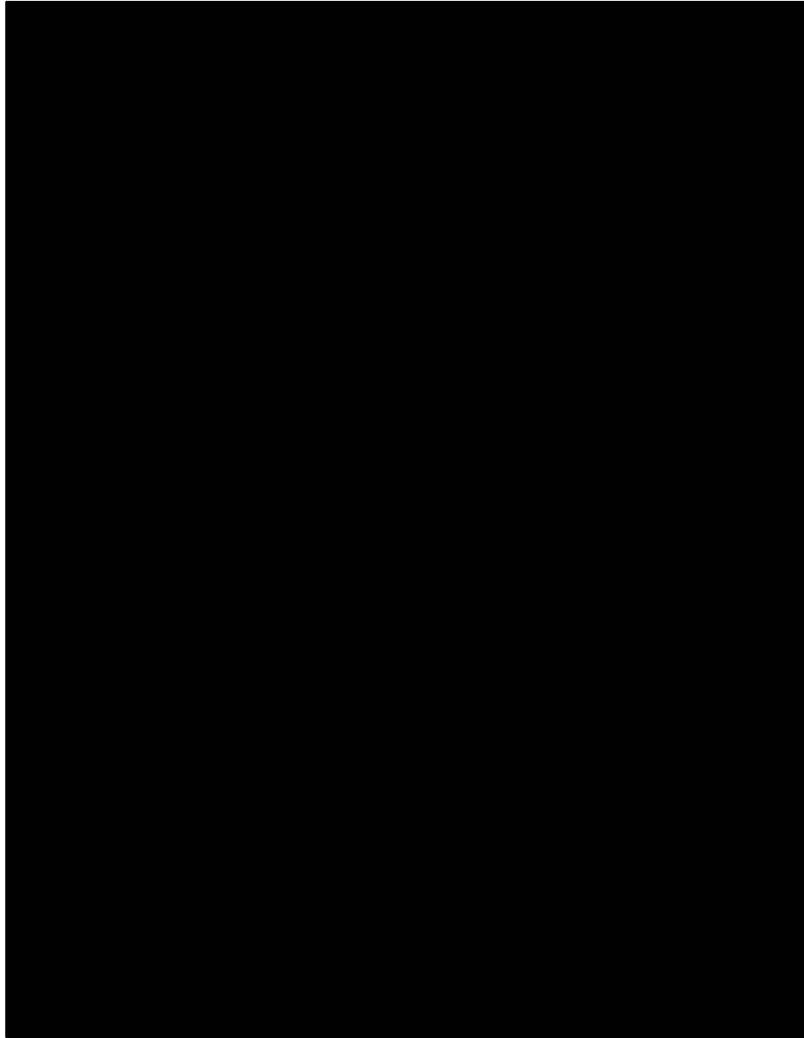
[REDACTED]

[REDACTED]

[REDACTED]

EXHIBIT 76 [REDACTED]

[REDACTED]



5330.8.F.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

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

5330.8.F.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

[REDACTED]

[REDACTED]

EXHIBIT 78

[REDACTED]

5330.8.F.5 HOW THE SKIN WILL DISCOVER AND UPDATE THE INTERNET PROTOCOL ADDRESS OF THE WAGERER IF SUCH CHANGES DURING A SESSION AND HOW PHYSICAL LOCATION WOULD THEN BE DETECTED



5330.8.F.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 AN ATTEMPT; AND HOW SUCH INFORMATION SHALL BE MADE AVAILABLE TO THE COMMISSION UPON REQUEST

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

5330.8.F.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

[REDACTED]

EXHIBIT 79

[REDACTED]

5330.8.F.8 HOW THE SKIN SHALL ENSURE THAT A MOBILE SPORTS WAGERING VENDOR LICENSE IS OBTAINED BY ANY GEOLOCATION VENDOR

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

5330.8.G **AMENDMENTS TO INTERNAL CONTROLS. A MOBILE SPORTS WAGERING LICENSEE SHALL SUBMIT TO THE COMMISSION ANY PROPOSED AMENDMENT TO SUCH LICENSEES APPROVED INTERNAL CONTROLS AT LEAST 30 DAYS IN ADVANCE OF THE DATE THE PROPOSED AMENDMENT IS INTENDED TO TAKE EFFECT**

