



Sports Wagering Operator & Vendor Scope of Licensing – Initial Survey

Pursuant to 205 CMR 211.01, this survey must be submitted as part of the application for a Category 1, Category 2, or Category 3 Sports Wagering License and must be submitted as a prerequisite to the submission of the additional application forms.*

SPORTS WAGERING LICENSE INFORMATION					
Seeking to apply as:	<table style="width: 100%; border: none;"> <tr> <td style="width: 50%; text-align: center;">Category 1 Operator</td> <td style="width: 50%; text-align: center;">Category 2 Operator</td> </tr> <tr> <td style="text-align: center;">Category 3 Operator</td> <td style="text-align: center;">Vendor to Operator</td> </tr> </table>	Category 1 Operator	Category 2 Operator	Category 3 Operator	Vendor to Operator
Category 1 Operator	Category 2 Operator				
Category 3 Operator	Vendor to Operator				

APPLICANT INFORMATION & DESCRIPTION	
Company Name:	
D/B/A or Trade Name(s):	
Corporate HQ Address: <i>(Also include the address of any operation/s in Massachusetts)</i>	
Point-of-Contact for Licensing Process: <i>(Include NAME, POSITION, ADDRESS, PHONE, EMAIL)</i>	
Description of Business:	
Goods/Services you expect to provide in Massachusetts:	

APPLICANT ORGANIZATIONAL INFORMATION										
Applicant Company Type:	<table style="width: 100%; border: none;"> <tr> <td><input type="checkbox"/> Sole Proprietorship</td> <td><input type="checkbox"/> LLC</td> <td><input type="checkbox"/> Cooperative</td> </tr> <tr> <td><input type="checkbox"/> C-Corporation</td> <td><input type="checkbox"/> S-Corporation</td> <td><input type="checkbox"/> Partnership</td> </tr> <tr> <td><input type="checkbox"/> SEC Registrant</td> <td colspan="2" style="text-align: center;">Other</td> </tr> </table>	<input type="checkbox"/> Sole Proprietorship	<input type="checkbox"/> LLC	<input type="checkbox"/> Cooperative	<input type="checkbox"/> C-Corporation	<input type="checkbox"/> S-Corporation	<input type="checkbox"/> Partnership	<input type="checkbox"/> SEC Registrant	Other	
<input type="checkbox"/> Sole Proprietorship	<input type="checkbox"/> LLC	<input type="checkbox"/> Cooperative								
<input type="checkbox"/> C-Corporation	<input type="checkbox"/> S-Corporation	<input type="checkbox"/> Partnership								
<input type="checkbox"/> SEC Registrant	Other									
Publicly Traded? :	<input type="checkbox"/> No Yes <i>(if "Yes", Stock exchange symbol and exchange)</i>									
Applicant Financial Statements Type:	<table style="width: 100%; border: none;"> <tr> <td><input type="checkbox"/> Audited</td> <td><input type="checkbox"/> Reviewed</td> <td>Consolidated</td> </tr> <tr> <td><input type="checkbox"/> Internally Compiled</td> <td>Externally Compiled</td> <td>Supplemental</td> </tr> <tr> <td colspan="3" style="text-align: center;">Other</td> </tr> </table>	<input type="checkbox"/> Audited	<input type="checkbox"/> Reviewed	Consolidated	<input type="checkbox"/> Internally Compiled	Externally Compiled	Supplemental	Other		
<input type="checkbox"/> Audited	<input type="checkbox"/> Reviewed	Consolidated								
<input type="checkbox"/> Internally Compiled	Externally Compiled	Supplemental								
Other										



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Applicant Tax Returns:	Stand-Alone	Consolidated <i>(with)</i>
Management Structure: <i>(Do you have any of the following?)</i>	Compliance Committee	Audit Committee
	Compliance Plan	Other(s)

ATTACHMENTS

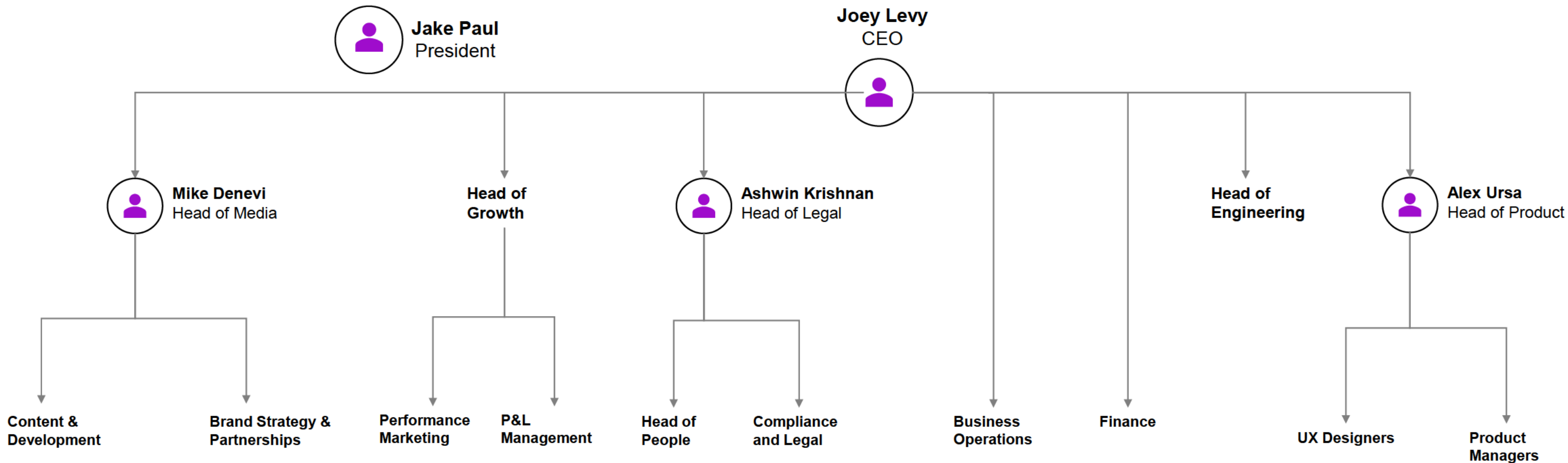
PLEASE SUBMIT THE FOLLOWING INFORMATION

- TABLE of ORGANIZATION** including parent companies and subsidiaries (note any companies that are publicly traded and are sports wagering-related).
- TABLE of OWNERSHIP INTERESTS** showing all ownership interests, including parent companies and subsidiaries showing the corporate structure with entity names and ownership percentages.
- FUNCTIONAL TABLE of ORGANIZATION** including the executive team and Board of Directors with individual names and titles, and percentage of ownership interest, if applicable.
- CONTROL** – List (1) individuals and entities who own 10 percent or more of the applicant; (2) individuals and entities who have the ability to control the activities of the applicant; and (3) any executive, employee or agent having the power to exercise significant influence over decisions concerning the applicant’s sports wagering operations in Massachusetts.
- INSTITUTIONAL INVESTORS** – Provide a list of these investors along with their percentage of ownership.
- LICENSING HISTORY** – List the last 3 jurisdictions in which licensed for sports wagering operations, including the type of license that was obtained.
- LICENSEE ASSOCIATION** – List any Gaming Licensee(s), Sports Wagering Operator Licensee(s) or Applicant(s) for a Sports Wagering Operator License with whom you have an agreement to conduct business or are in the process of negotiating an agreement.
- ON-SITE PERSONNEL (for Vendor only)** – If you expect to have any personnel on-site at a Massachusetts casino, please indicate the approximate number and a brief description of their duties.

*Pursuant to 205 CMR 211.01, this survey must be submitted as part of the application for a Category 1, Category 2, or Category 3 Sports Wagering License and must be submitted as a prerequisite to the submission of the additional application forms, which consist of the following:

- Application for Category 1, 2, & 3 Sports Wagering Operator License;
- For designated entity qualifiers, Business Entity Disclosure Form;
- For designated individual qualifiers, Multi-jurisdictional Personal History Form; and
- For designated individual qualifiers, Massachusetts Supplemental Form.

Failure to submit this Survey by October 17, 2022, shall result in the Commission deeming the application incomplete and administratively closed unless the Commission authorizes an extension of time pursuant to 205 CMR 211.01(10).



Board of Directors

Joey Levy
Nakisa Bidarian
Geoffrey Woo
Saxon Baum
Greg Elinsky

Ownership

Leadership Team

Individual	Share Count	Ownership %
Joey Levy	████████	██████
Jake Paul	████████	██████
Alex Ursa	██████	██████
Ashwin Krishnan	██████	██████
Mike Denevi	██████	██████

All shares count and percentages accurate as of the Series A financing round and the equity-based EBCI market access agreement

NOTE: Employee Shares subject to a vesting period

Board of Directors

Individual	Share Count	Ownership %
Joey Levy	<i>Shown as part of Leadership team</i>	
Nakisa Bidarian	██████	██████
Geoffrey Woo	██████	██████
Saxon Baum ¹	██████	██████
Greg Elinsky ²	████████	██████

1. Board Director representative from Florida Funders. Ownership % and share count reflects total Florida Funders shares and not that of the individual

2. Board Director representative from Simplebet. Ownership % and share count reflects total Simplebet shares and not that of the individual

Table of Organization

Betr Maryland, LLC is a wholly-owned subsidiary of Betr Holdings, Inc. and was created on October 14, 2022 in connection with Betr's efforts to obtain sports wagering market access in the State of Maryland.

Betr Holdings, Inc. has no other parents, subsidiaries, or affiliated entities at this time but may form a wholly-owned subsidiary (such as Betr Massachusetts, LLC) for purposes of its sports wagering operations in the Commonwealth of Massachusetts.

Table of Ownership Interests

Please see the attached Capitalization Table and Functional Table of Organization.

Functional Table of Organization

Please see the attached Functional Table of Organization.

Control

Joey Levy (██████), Jake Paul (██████), and Simplebet, Inc. (██████) are the only individuals/entities who own 10% or more of Betr Holdings, Inc.

The Board of Directors of Betr Holdings, Inc. is comprised of Joey Levy, Geoffrey Woo, Nakisa Bidarian, Greg Elinsky (Simplebet representative), and Saxon Baum (Florida Funders representative).

Institutional Investors

We do not believe that we have any institutional investors as that term is commonly understood in securities-related transactions.

Licensing History

We are not currently licensed for sports wagering in any jurisdictions but have submitted applications for licensing in Ohio, Indiana, Virginia, and expect to do so in Maryland as well in the coming days.

Licensee Association

We do not have any agreements with any Gaming Licensee(s), Sports Wagering Operating Licensee(s), or Applicants for a Sports Wagering Operating License in the Commonwealth of Massachusetts.

	SAFE					
	Pre-Money Capitalization			Post-Money Capitalization		
Valuation (\$ millions)						
\$ Raised (Millions)						
Per Share Price						
Employee / Advisor Pool						
Holder - By Class	Shares	\$	%	Shares	\$	%
Series A Preferred Stock						
Series A Preferred Stock - SAFE						
Series A Preferred Warrants - Eastern Band of Cherokee						
Series A1 Preferred Stock						
Common Warrants – Hall of Fame						
Common Options – Aliya						
Series A2 Preferred Stock - SAFE						
Class B Common Stock						
Class A Common Stock						
Employee / Advisor Pool						
Total						

	Series A					
	Pre-Money Capitalization			Post-Money Capitalization		
Valuation (\$ millions)						
\$ Raised (Millions)						
Per Share Price						
Employee / Advisor Pool						
Holder - By Class	Shares	\$	%	Shares	\$	%
Series A Preferred Stock						
Series A Preferred Stock - SAFE						
Series A Preferred Warrants - Eastern Band of Cherokee						
Series A1 Preferred Stock						
Common Warrants – Hall of Fame						
Common Options – Aliya						
Series A2 Preferred Stock - SAFE						
Class B Common Stock						
Class A Common Stock						
Employee / Advisor Pool						
Total						

	Series A & Eastern Band of Cherokee		
	Post-Money Capitalization		
Valuation (\$ millions)			
\$ Raised (Millions)			
Per Share Price			
Employee / Advisor Pool			
Holder - By Class	Shares	\$	%
Series A Preferred Stock			
Series A Preferred Stock - SAFE			
Series A Preferred Warrants - Eastern Band of Cherokee			
Series A1 Preferred Stock			
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Common Options – Aliya			
Series A2 Preferred Stock - SAFE			
Class B Common Stock			
Class A Common Stock			
Employee / Advisor Pool			
Total			