



# 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	
<b>Seeking to apply as:</b>	<input type="checkbox"/> Category 1 Operator <input type="checkbox"/> Category 2 Operator <input checked="" type="checkbox"/> Category 3 Operator <input type="checkbox"/> Vendor to Operator

APPLICANT INFORMATION & DESCRIPTION	
<b>Company Name:</b>	Betfair Interactive, US LLC
<b>D/B/A or Trade Name(s):</b>	FanDuel Sportsbook
<b>Corporate HQ Address:</b> <i>(Also include the address of any operation/s in Massachusetts)</i>	300 Park Avenue S 14th Fl New York, NY 10010
<b>Point-of-Contact for Licensing Process:</b> <i>(Include NAME, POSITION, ADDRESS, PHONE, EMAIL)</i>	Ben Roth Counsel, Legal and Regulatory Affairs Same address as above [REDACTED] ben.roth@fanduel.com
<b>Description of Business:</b>	Operate licensed online/mobile sports wagering platform and retail sports wagering in numerous U.S. states, as well as online interactive casino gaming in permitted jurisdictions
<b>Goods/Services you expect to provide in Massachusetts:</b>	Mobile sports wagering platform

APPLICANT ORGANIZATIONAL INFORMATION	
<b>Applicant Company Type:</b>	<input type="checkbox"/> Sole Proprietorship <input checked="" 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 <input type="checkbox"/> Other
<b>Publicly Traded? :</b>	<input type="checkbox"/> No <input checked="" type="checkbox"/> Yes <i>(if "Yes", Stock exchange symbol and exchange)</i> <small style="text-align: center;">Ultimate parent company is publicly traded: Flutter Entertainment plc (LSE: FLTR)</small>
<b>Applicant Financial Statements Type:</b>	<input checked="" type="checkbox"/> Audited <input type="checkbox"/> Reviewed <input checked="" type="checkbox"/> Consolidated <input type="checkbox"/> Internally Compiled <input type="checkbox"/> Externally Compiled <input type="checkbox"/> Supplemental <input type="checkbox"/> Other



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<b>Applicant Tax Returns:</b>	<input type="checkbox"/> Stand-Alone <input checked="" type="checkbox"/> Consolidated <i>(with)</i> <div style="text-align: right; margin-left: 150px;">Parent company, FanDuel Group, Inc.</div>
<b>Management Structure:</b> <i>(Do you have any of the following?)</i>	<input checked="" type="checkbox"/> Compliance Committee <input checked="" type="checkbox"/> Audit Committee <input checked="" type="checkbox"/> Compliance Plan <input checked="" type="checkbox"/> Other(s) Risk

### 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.

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- 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).

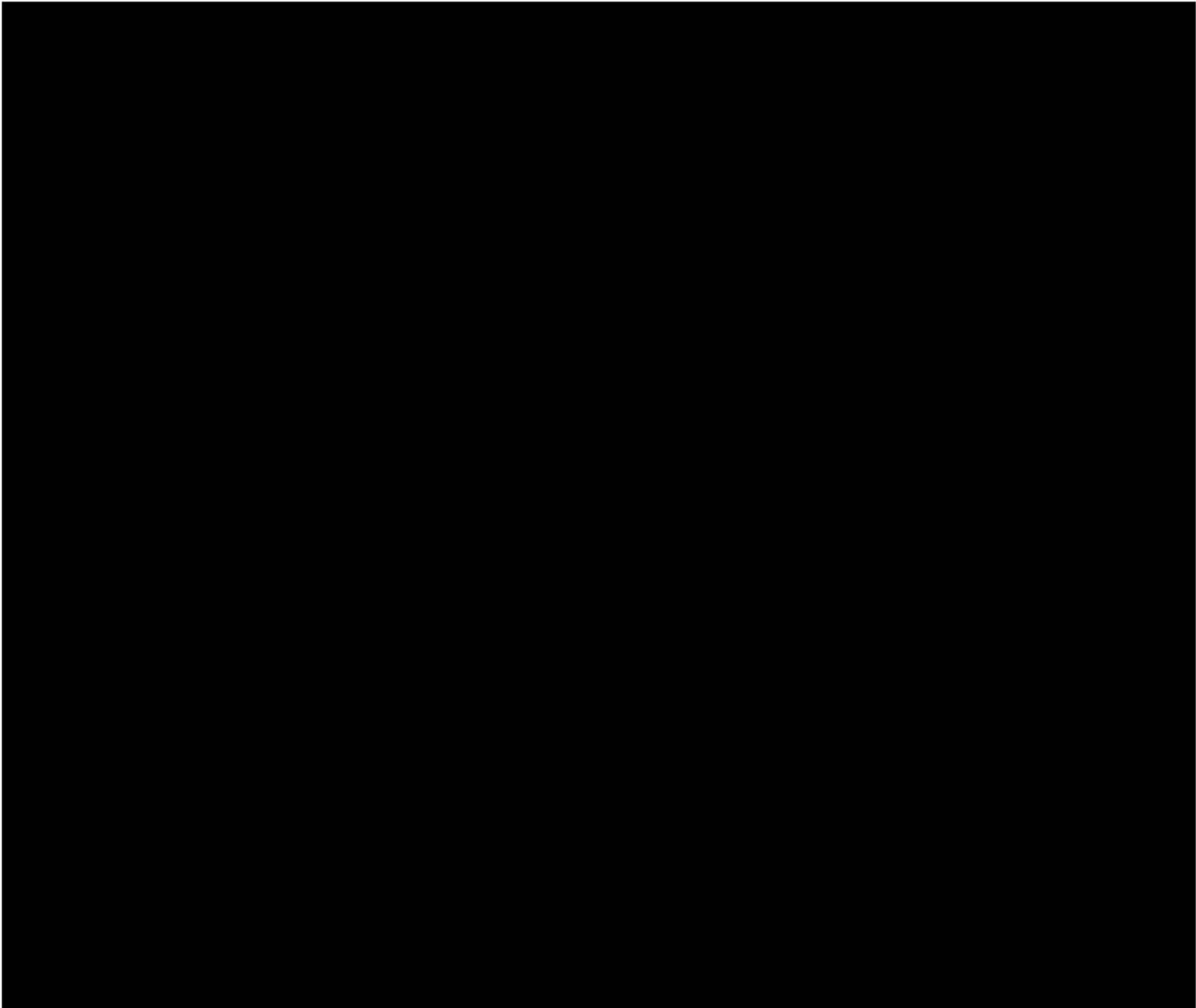
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- 1. TABLE of ORGANIZATION including parent companies and subsidiaries (note any companies that are publicly traded and are sports wagering-related).*
- 2. TABLE of OWNERSHIP INTERESTS showing all ownership interests, including parent companies and subsidiaries showing the corporate structure with entity names and ownership percentages.*

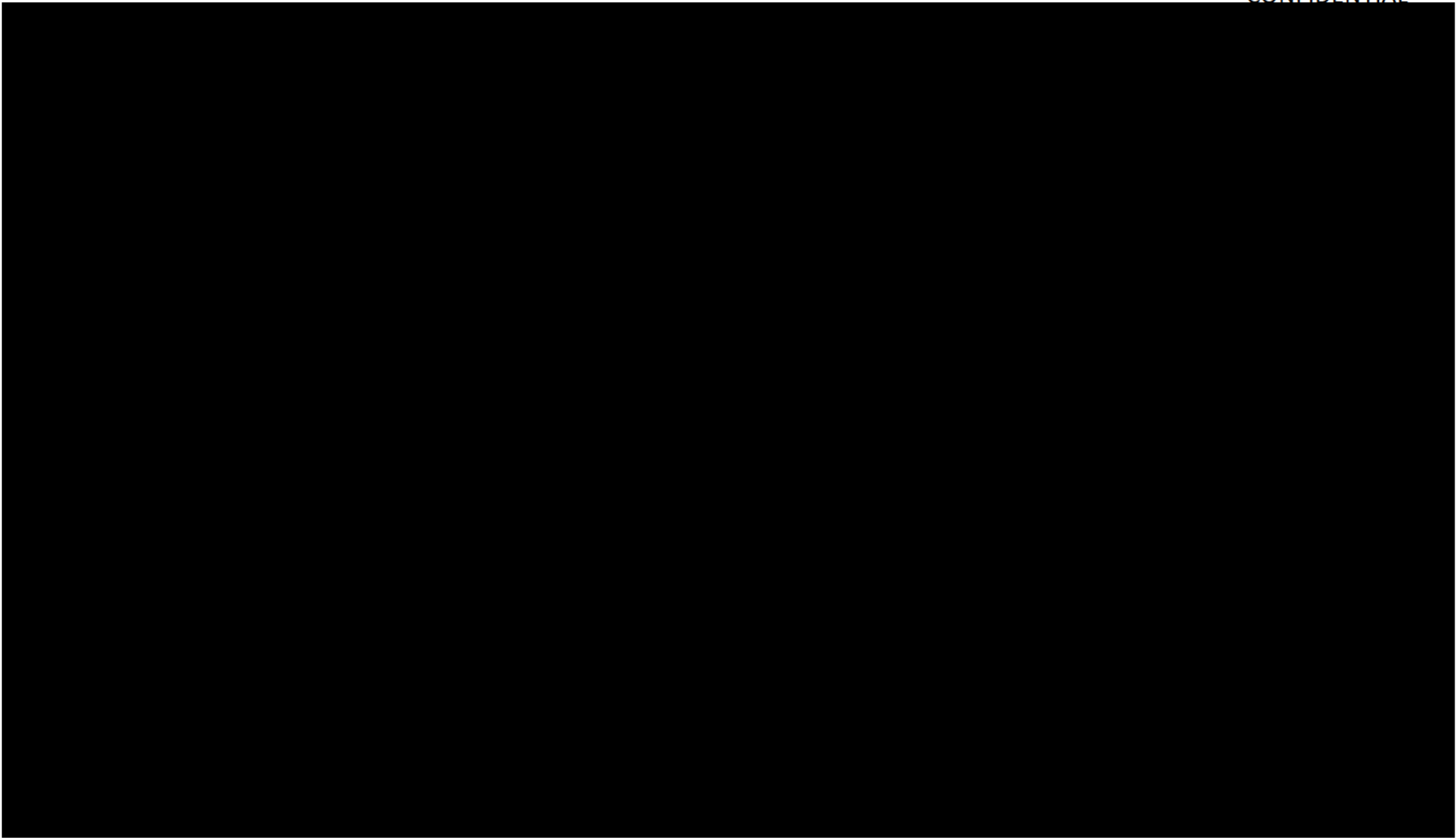
Please see attached chart reflecting the corporate organization of applicant Betfair Interactive US LLC and its parent and subsidiary companies, up to ultimate parent company Flutter Entertainment plc (“Flutter”).

Flutter is a public traded company on the London Stock Exchange (ticker: FLTR), and as such the ownership percentages held by its significant shareholders fluctuates over time. No shareholder of Flutter has the ability to control the activities of applicant Betfair Interactive US LLC. Please see item 5 for additional information regarding Flutter’s institutional investors.



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3. **FUNCTIONAL TABLE of ORGANIZATION** including the executive team and Board of Directors with individual names and titles, and percentage of ownership interest, if applicable
4. **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.

Applicant Betfair Interactive US LLC is [REDACTED], an indirect subsidiary of Flutter Entertainment plc (formerly known as Paddy Power Betfair plc), which is publicly traded on the London Stock Exchange. Please see item 1 for a chart reflecting the company’s corporate structure.

Betfair Interactive US LLC has two managers – Amy Howe and David Jennings [REDACTED]

[REDACTED] FanDuel Group also has various other executive personnel responsible for oversight of different organizational functions. The following individuals are primarily responsible for operations, technology, legal/compliance, and marketing:

- Andrew Sheh (Chief Technology Officer)
- Carolyn Renzin (Chief Legal & Compliance Officer)
- Michael Raffensperger (Chief Commercial Officer)
- John Griffin (Senior Vice President, Sports Commercial)

If further information is needed regarding applicant’s management structure, it can be provided in connection with scoping discussions with Commission staff or otherwise upon request.



Flutter Entertainment plc is a publicly traded company (LSE: FLTR) and the parent company for a range of international brands and operations, including FanDuel, Sky Betting & Gaming, Sportsbet, PokerStars, Paddy Power, Tombola, Betfair, FoxBet, TVG, Jungle Games and Adjarabet. It is managed by its corporate officers (Peter Jackson-CEO, and Jonathan Hill-CFO), under the supervision of its Board of Directors—which is comprised of two executive directors (Mr. Jackson and Mr. Hill), a Chairman (Gary McGann), and eleven independent directors.

No individual person holds a 5% or greater interest in the publicly traded company Flutter Entertainment plc. Please see item 5 for information regarding Flutter's institutional investors.

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5. *INSTITUTIONAL INVESTORS* – Provide a list of these investors along with their percentage of ownership.

[REDACTED] Applicant's ultimate parent company, Flutter Entertainment plc, is a publicly traded company listed on the London Stock Exchange (ticker: FLTR), and as such the ownership percentages held by its significant shareholders fluctuates over time.

At this time, there are two institutional investors that hold a 10% or greater equity interest in Flutter, listed below along with their approximate current ownership percentage:

- The Capital Group Companies, Inc. (13%)
- Caledonia (Private) Investments Pty Limited (10%)



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- 6. LICENSING HISTORY** – *List the last 3 jurisdictions in which licensed for sports wagering operations, including the type of license that was obtained.*

Applicant Betfair Interactive US LLC holds permanent or provisional licenses for the operation of mobile and/or retail sports wagering licenses in twenty-one states, and has a pending application in Ohio. The three most recently issued new licenses are as follows:

1. Nevada (August 25, 2022): Manufacturer, Distributor, and Information Service Licenses (35545-01, 35546-01, 35547-01)
2. Kansas (August 24, 2022): Sports Wagering Provisional Certification (#5000556)
3. District of Columbia (June 21, 2022): Provisional Class A Sports Wagering Operator License (No. PSW21CLA0004)

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7. **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.*

