



Blue Tarp reDevelopment, LLC d/b/a MGM Springfield
Massachusetts Gaming Commission
Application for Category 1 Sports Wagering Operator License
November 2022

B.1 APPLICANT'S ABILITY TO OFFER SPORTS WAGERING IN THE COMMONWEALTH

Provide a thorough description of the applicant's ability to offer sports wagering in the Commonwealth. This should include the following:

a. Background in sports wagering

Blue Tarp reDevelopment, LLC d/b/a MGM Springfield ("MGMS") intends to offer its sports wagering product in close coordination with BetMGM, LLC ("BetMGM"). BetMGM is one of the leading entertainment companies in North America, pioneering the expansion of online sports betting and gaming. Backed by the strengths of two global gaming giants, MGM Resorts International ("MGMRI") and Entain, BetMGM is well-positioned to maintain its momentum and further establish itself as a market leader for years to come. BetMGM currently offers sports wagering and igaming in 25 jurisdictions across North America and has the leading market share in several of those jurisdictions. In its three-year existence, BetMGM has established itself as a top platform provider, operator, and employer in the U.S. online gaming space.

MGMS is excited to have engaged BetMGM as its sports wagering service provider. However, all final decisions regarding retail sports wagering will be in MGMS's sole and absolute discretion.



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B.1 APPLICANT'S ABILITY TO OFFER SPORTS WAGERING IN THE COMMONWEALTH

Provide a thorough description of the applicant's ability to offer sports wagering in the Commonwealth. This should include the following:

b. Experience and licensure in other jurisdictions with sports wagering

MGMS intends to offer its sports wagering product in close coordination with our service provider BetMGM. Our parent company MGMRI and BetMGM have an abundance of experience in both mobile and retail sports wagering operations across North America. MGMRI has shown its sports wagering experience by receiving licenses to operate in our other retail states of, NV, NJ, MS and MD. A parallel bid for a sports wagering license in OH is also underway, at the same time as this process in MA. BetMGM has been thoroughly vetted and issued both sports betting and igaming licenses by 27 regulatory bodies, to date. Several of BetMGM's executives and employees have similarly been found suitable by gaming regulatory bodies across North America.

Since the initial dates of issuance, MGMRI and BetMGM have been successful in maintaining the good standing of each gaming license and have never had a license revoked, denied, or not renewed.



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B.1 APPLICANT'S ABILITY TO OFFER SPORTS WAGERING IN THE COMMONWEALTH

Provide a thorough description of the applicant's ability to offer sports wagering in the Commonwealth. This should include the following:

c. Plans to offer the platform in coordination with other applicants or person

MGMRI intends to offer its sports wagering product in close coordination with its service provider BetMGM. MGMRI works closely with BetMGM across the US, particularly in states where MGMRI has a physical retail presence. BetMGM's experience as a leading online sports wagering operator, coupled with MGMRI's brand recognition and industry experience, produce a best-in-class offering to our customers.

The integration with MGM Rewards drives superior player experience and loyalty. With BetMGM as our service provider, not only do our customers get the best overall betting experience, but betting with our service provider BetMGM racks up premium perks with the MGM Rewards program. This provides an experience that players will not find anywhere else. This integration is particularly powerful in states where MGMRI has a physical presence, such as Massachusetts, and where players have a connection with MGMRI properties in Las Vegas.



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B.1 APPLICANT'S ABILITY TO OFFER SPORTS WAGERING IN THE COMMONWEALTH

Provide a thorough description of the applicant's ability to offer sports wagering in the Commonwealth. This should include the following:

d. Intention to limit participation in any allowable sports events

MGMS will limit its sports wagering offerings to the events, wager-types, and markets approved by the Massachusetts Gaming Commission (the "Commission"). MGMS relies on the experience of our parent company MGMRI and sister properties in other jurisdictions to bolster and cement our position in offering Sports Wagering in the Commonwealth. MGMS will use the same general processes and controls employed in the jurisdictions in which BetMGM and MGMRI currently operate to mitigate risk of an unapproved offering. To the extent required, MGMS, in conjunction with our service provider BetMGM, will develop processes or controls to comply with any unique Massachusetts requirements that are not fully addressed through MGMS's existing processes and controls.



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B.2 SPORTS WAGERING EXPERIENCE - DESCRIPTION OF SPORTS WAGERING OPERATION
(Category 1 & 2 Applicants Only)

Provide a thorough description of the sports wagering operation proposed for the Commonwealth. This should include the following:

a. Description of the customer experience, including options, promotions, and offers

MGMS has constructed a first-class Sports Wagering lounge with stadium seating and a 45-foot viewing wall, as well as an enclosed wagering counter and space for wagering kiosks. The area is positioned close to our Main Street entrance/exit, along with many other immediately accessible gaming and non-gaming amenities, such as slots, table games, Island Bar and Costa restaurant.

Based on success in other jurisdictions, we look to offer in-person Sports Wagering both by staff operated point-of-sale at the wagering counter and through automated kiosks. Regarding automated kiosks, wager odds and writing software will be the same for these and the point-of-sale machines. This way, we can provide a consistent and fair wagering experience across the different desired channels. MGMS will install automated kiosks close to the lounge. For better guest service and convenience MGMS will also install kiosks in other locations around the gaming area.

MGMS, in conjunction with BetMGM, plans to offer a unique combination of betting options, promotions, and offers to create a best-in-class experience for Massachusetts customers. MGMS's promotional offerings will include, but are not limited to, free bets, bonuses, and adjusted odds offerings. In addition, MGM Rewards members accrue loyalty points for the sports wagers like they do for other gaming and non-gaming spend at MGMS and all other MGM properties. These loyalty points can go directly toward growing status, as well as the types of complimentary offers and non-gaming benefits we offer property and companywide.



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**B.2 SPORTS WAGERING EXPERIENCE - DESCRIPTION OF SPORTS WAGERING OPERATION
(Category 1 & 2 Applicants Only)**

Provide a thorough description of the sports wagering operation proposed for the Commonwealth. This should include the following:

b. Overview of wagering activity

Based on success in other jurisdictions, we look to offer in-person Sports Wagering both by staff operated point-of-sale at the wagering counter and through automated kiosks. Regarding automated kiosks, wager odds and writing software will be the same for these and the point-of-sale machines. This way, we can provide a consistent and fair wagering experience across the different desired channels. MGMS will install automated kiosks close to the lounge. For better guest service and convenience MGMS will also install kiosks in other locations around the gaming area.



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SECTION C: ECONOMIC IMPACT ON THE COMMONWEALTH

C.1 EMPLOYMENT OPPORTUNITIES WITHIN THE COMMONWEALTH

Provide a thorough description of the employment opportunities that will be offered if the applicant is approved for licensure by the Commission. This should include the following:

a. The number of current full-time and part-time employees within the Commonwealth

As of Q3 2022, MGMS employs a total of 1,330 employees.* Of those employees, 878 are full-time, 278 are part-time, and 174 are on call.

*Includes MGMS team members employed at the MassMutual Center.



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C.1 EMPLOYMENT OPPORTUNITIES WITHIN THE COMMONWEALTH

Provide a thorough description of the employment opportunities that will be offered if the applicant is approved for licensure by the Commission. This should include the following:

b. The number of current work locations within the Commonwealth

MGMS currently operates one work location within the Commonwealth.



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C.1 EMPLOYMENT OPPORTUNITIES WITHIN THE COMMONWEALTH

Provide a thorough description of the employment opportunities that will be offered if the applicant is approved for licensure by the Commission. This should include the following:

- c. The number of proposed full-time and part-time positions that will be created within the Commonwealth**

Upon approval for licensure by the Commission, MGMS proposes creating thirteen (13) new full-time positions and four (4) new part-time positions. This number is subject to adjustment. Please refer to Section C.1.d for further information.



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C.1 EMPLOYMENT OPPORTUNITIES WITHIN THE COMMONWEALTH

Provide a thorough description of the employment opportunities that will be offered if the applicant is approved for licensure by the Commission. This should include the following:

- d. The title, job description, salary, and benefits information for each of the proposed positions**

Upon approval for licensure by the Commission, MGMS proposes creating thirteen (13) new full-time positions and four (4) new part-time positions. The proposed positions include the following:

1. [REDACTED]



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C.1 EMPLOYMENT OPPORTUNITIES WITHIN THE COMMONWEALTH

Provide a thorough description of the employment opportunities that will be offered if the applicant is approved for licensure by the Commission. This should include the following:

e. The training that will be required and made available for all proposed positions

Our service provider, BetMGM, will lead training for the proposed positions including training on staff operated point of sale systems, how to take and pay bets, and use and maintenance of the automated kiosks. MGMS anticipates that the training schedule will be similar, but not limited to the type training that BetMGM will provide to its employees.

Time	Activity	Time	Activity	Time	Activity
8:00 AM	Introductions	8:00 AM	Review	8:00 AM	Review
9:15 AM	Service Standards	9:15 AM	Hands on EPOS	9:15 AM	Hands on EPOS
9:30 AM	Policy & Procedures	9:30 AM	Hands on EPOS	9:30 AM	Hands on EPOS
10:00 AM	Break	10:00 AM	Break	10:00 AM	Break
10:15 AM	AML	10:15 AM	Hands on EPOS	10:15 AM	Final Review
10:30 AM	Title 31	10:30 AM	Hands on EPOS	10:30 AM	Test
12:00 PM	Lunch	12:00 PM	Lunch	12:00 PM	Lunch
1:00 PM	Responsible Gaming	1:00 PM	Cash Tickets	1:00 PM	Password Change
1:30 PM	Sports 101	1:30 PM	Cash Handling	1:30 PM	Manager Meeting
1:45 PM	Sports 101	1:45 PM	Supervisor Training	1:45 PM	Final Checklist
2:00 PM	Break	2:00 PM	Break	2:00 PM	Break
2:30 PM	EPOS Training	2:30 PM	Supervisor Training	2:30 PM	Book Set up
3:00 PM	Hands on EPOS	3:00 PM	Supervisor Training	3:00 PM	Print Sheets
3:30 PM	Write Tickets	3:30 PM	Kiosks Training	3:30 PM	Supplies Setup
3:45 PM	Hands on EPOS	3:45 PM	Cage Training	3:45 PM	Misc
4:00 PM	End of Day	4:00 PM	End of Day	4:00 PM	End of Day



Cage Training

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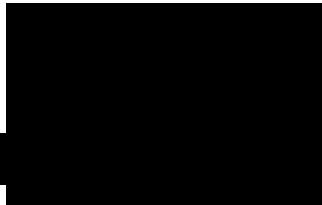
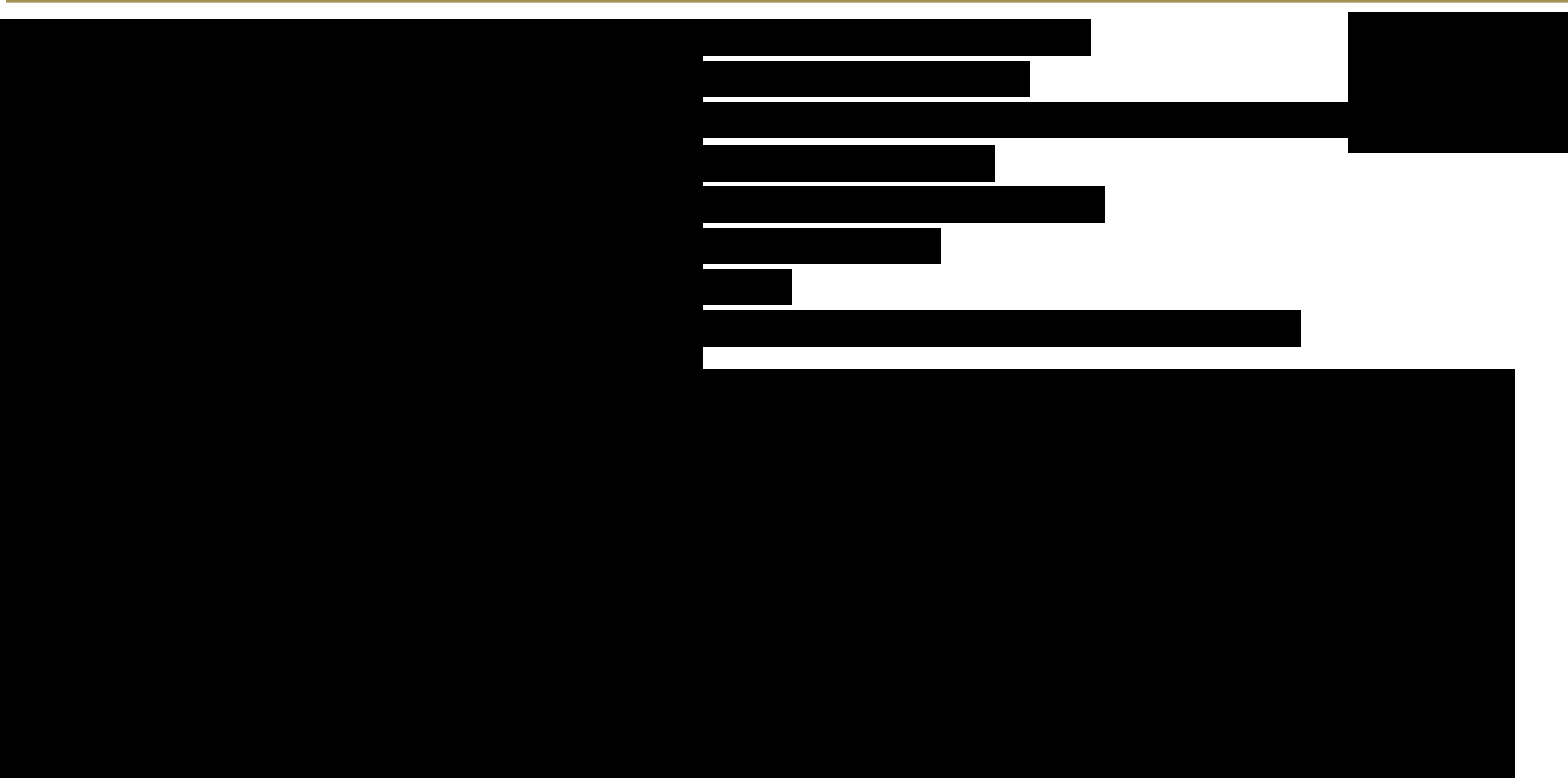
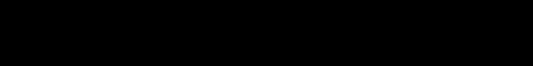
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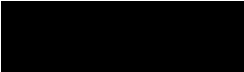
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Cashing Tickets

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End Of Day Procedures

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BETMGM
BELIEVE IN YOUR GAME



BETMGM

Kiosk Training

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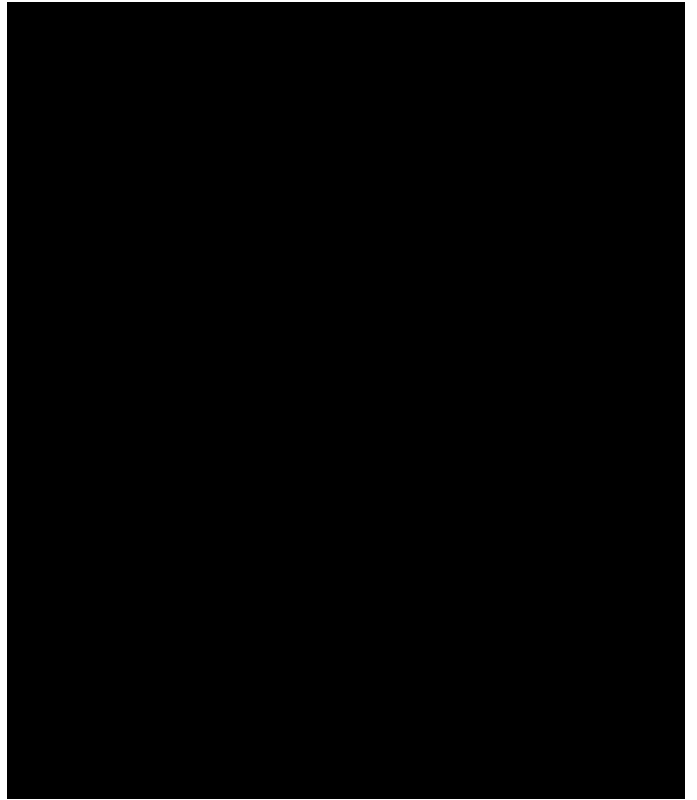
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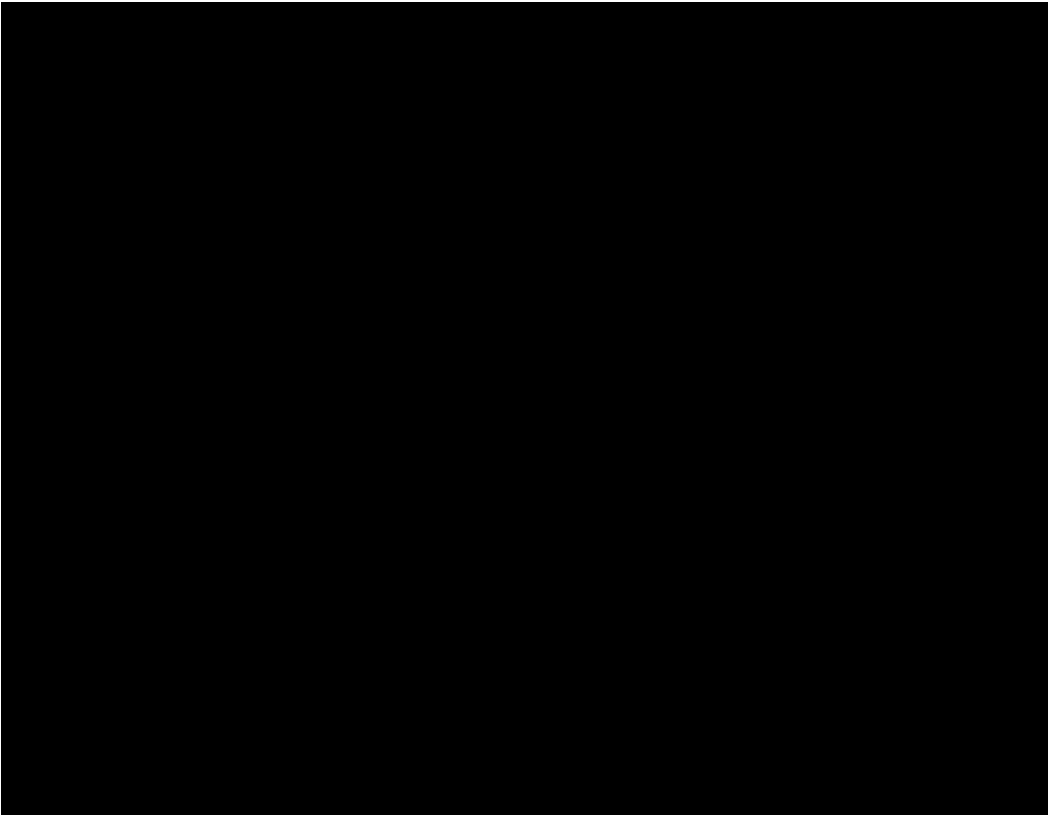
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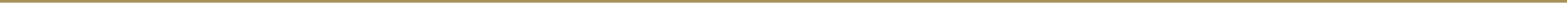
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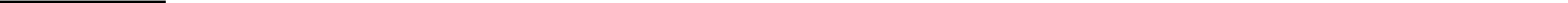
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BETMGM

Kiosks Connections/Maintenance

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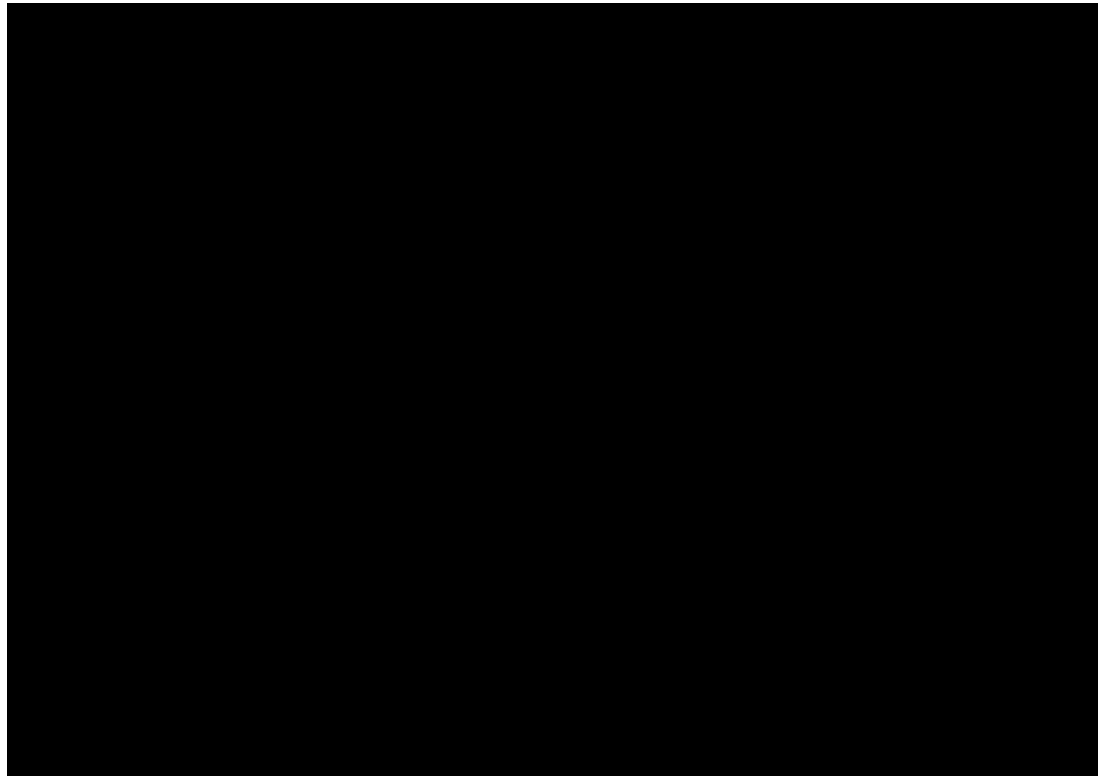
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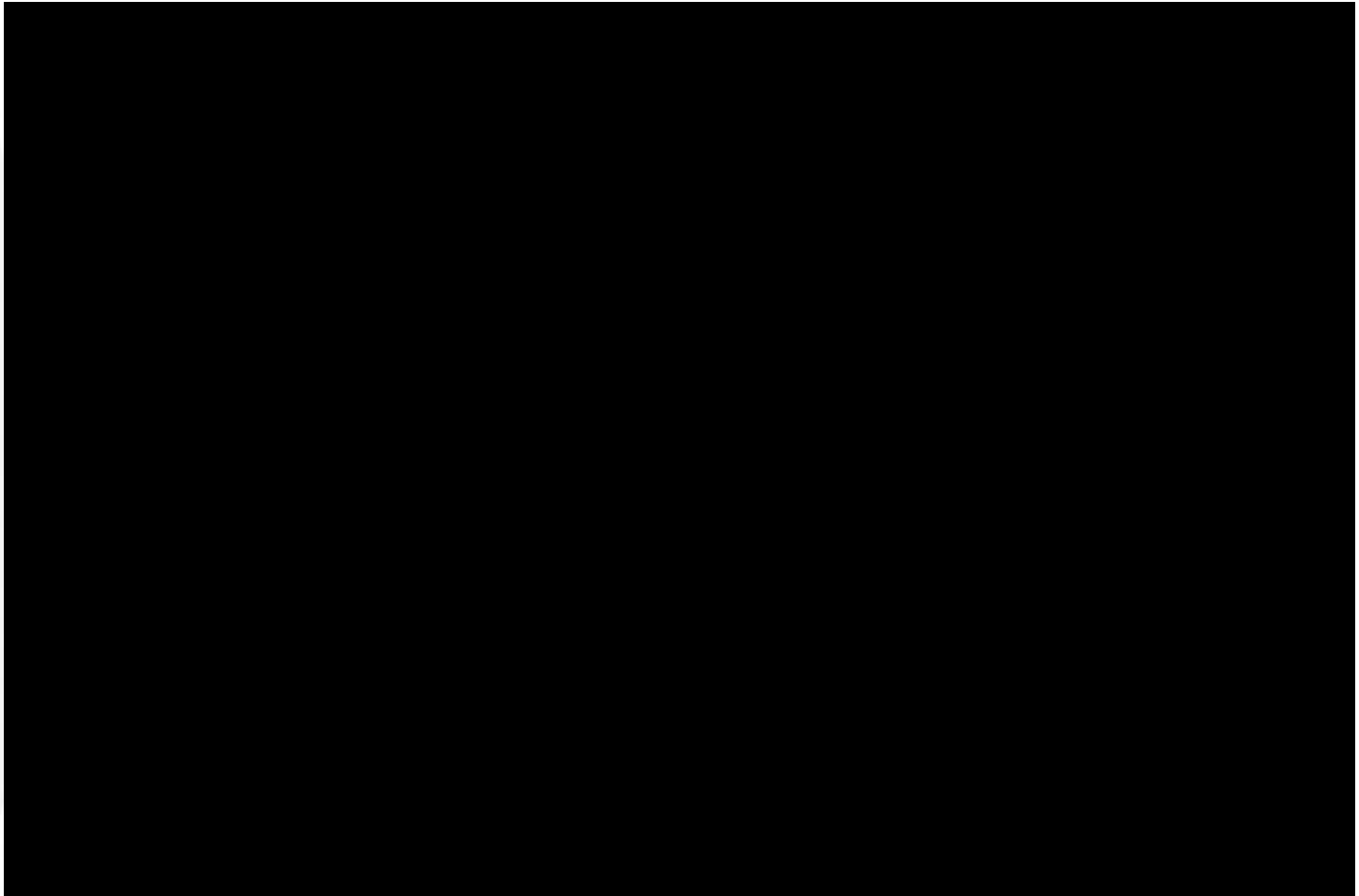
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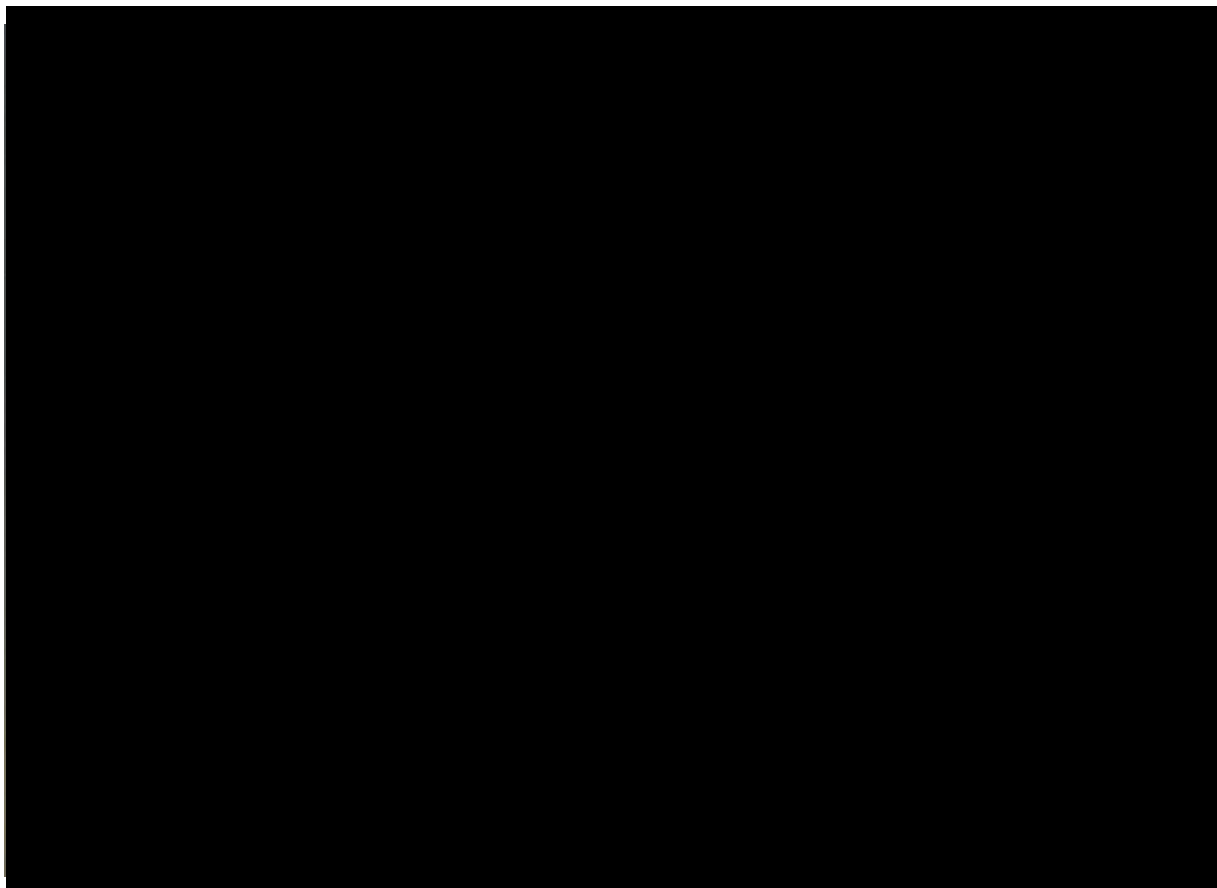
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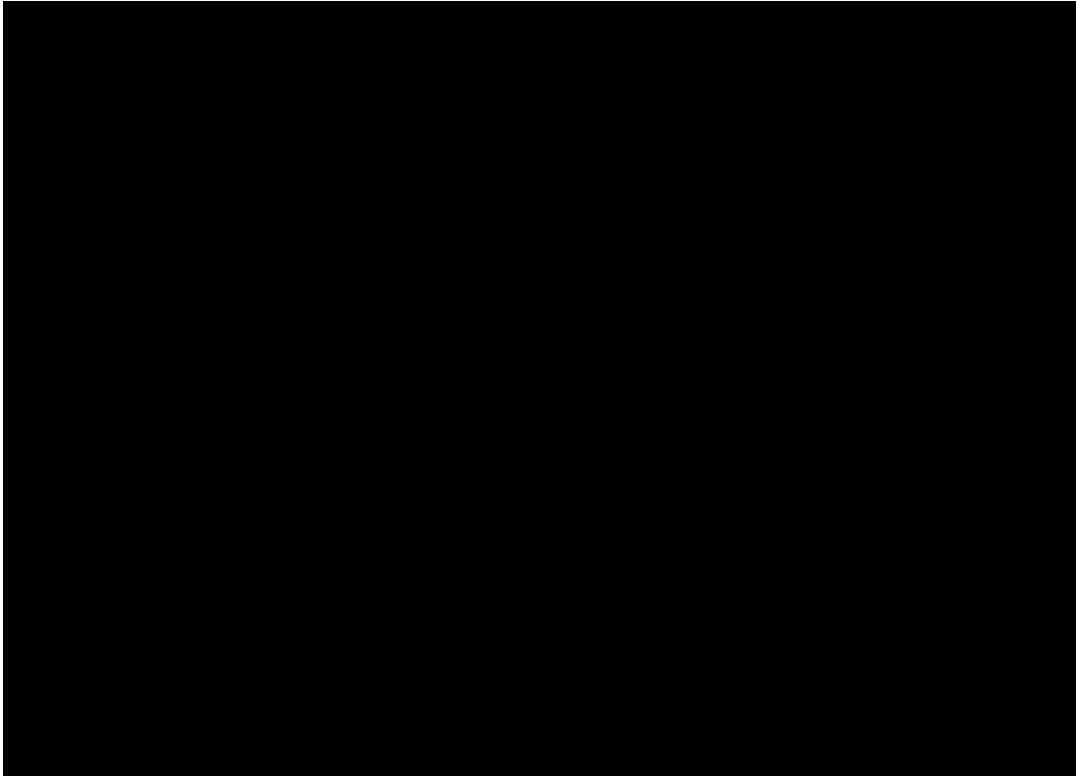
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BETMGM
BELIEVE IN YOUR GAME



BETMGM

SPORTSBOOK
Training

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BETMGM

Sportsbook Service Standards

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BETMGM

Policy and Procedures

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IRS Tickets

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BETMGM

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BETMGM

Cash Handling

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BETMGM

Breaks/Leaving Floor

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BETMGM

Opening/Closing
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Title 31 / AML

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BETMGM

Responsible Gaming

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BETMGM

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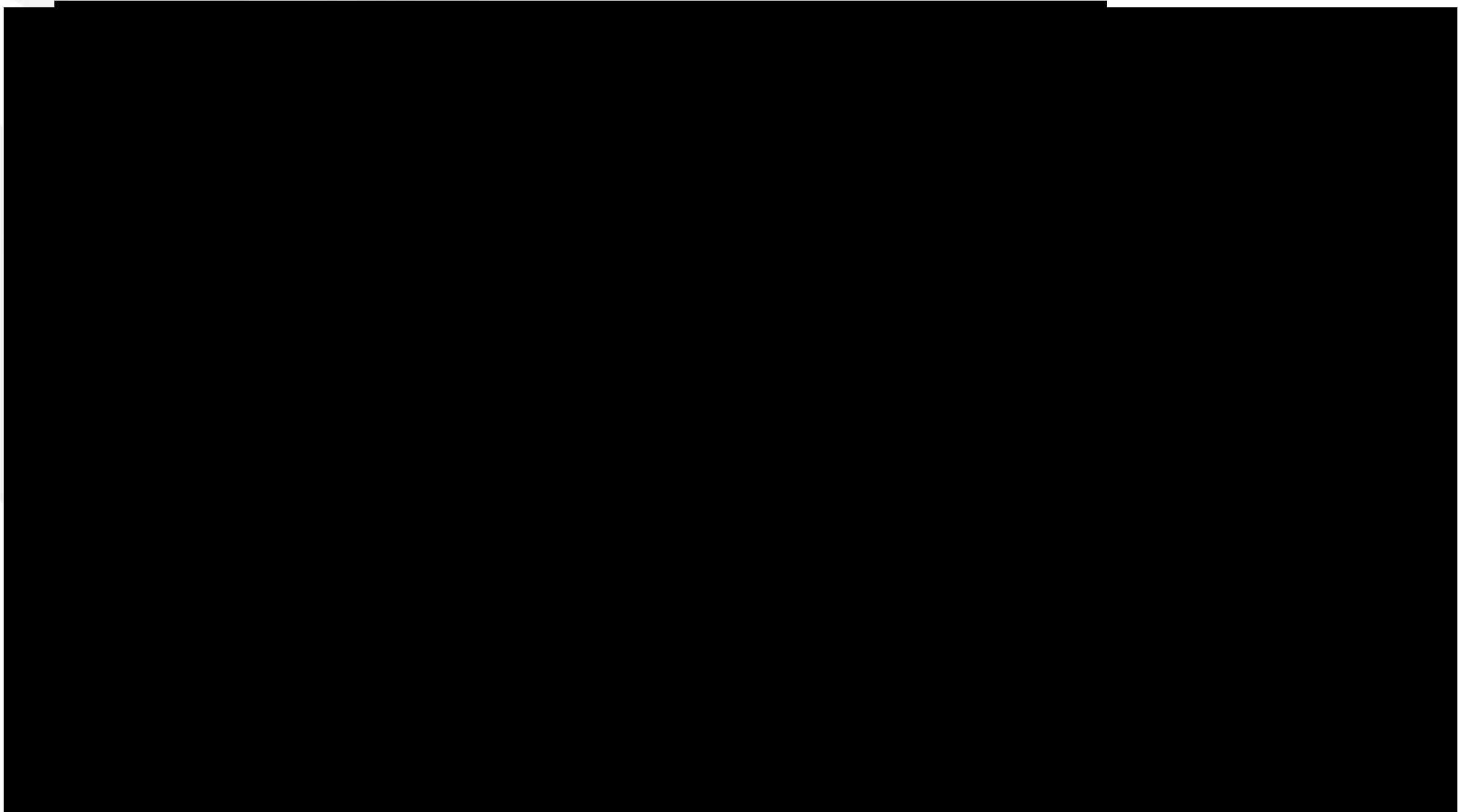
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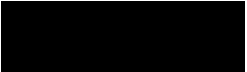
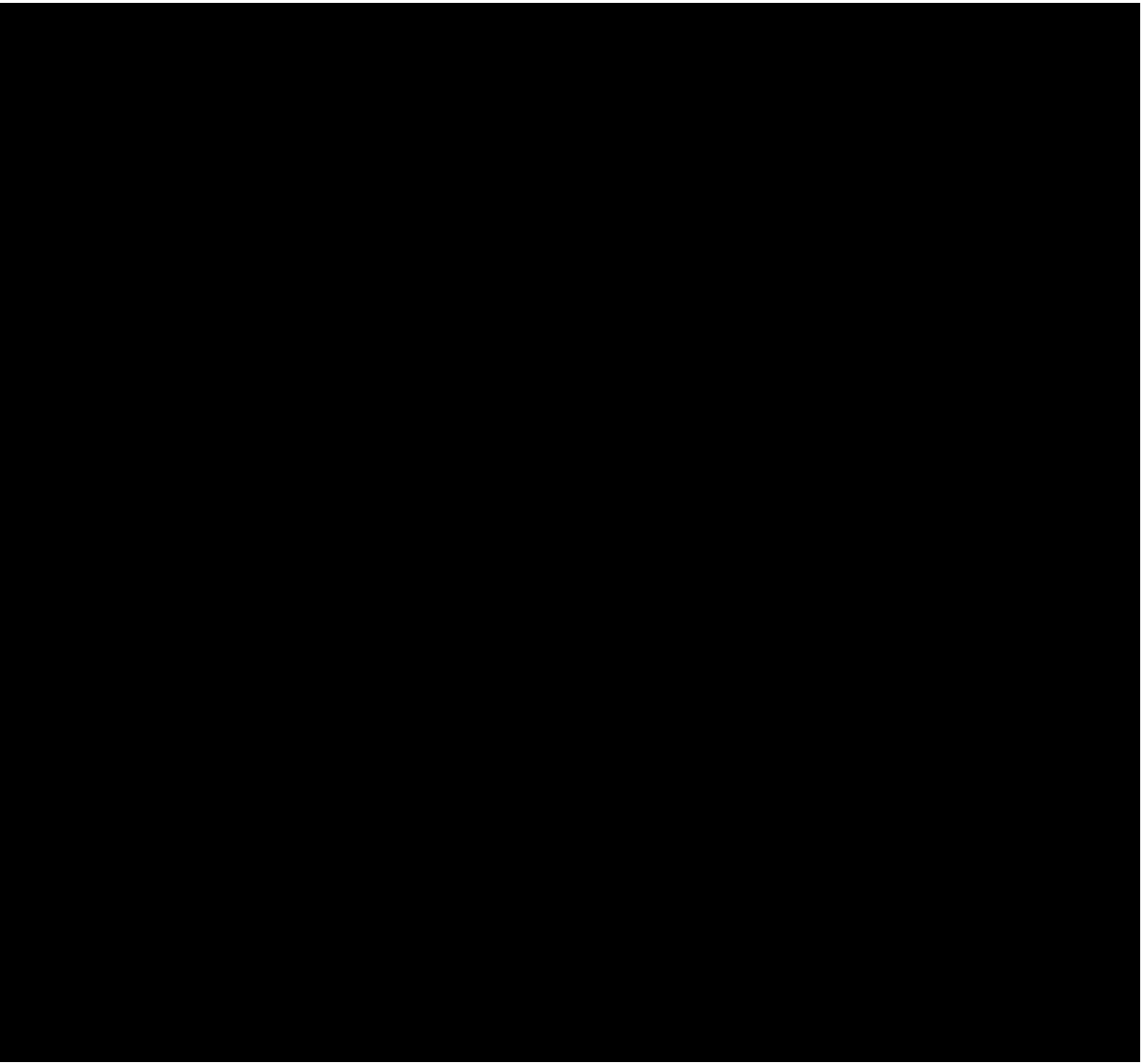
BETMGM

Sports Wagering 101

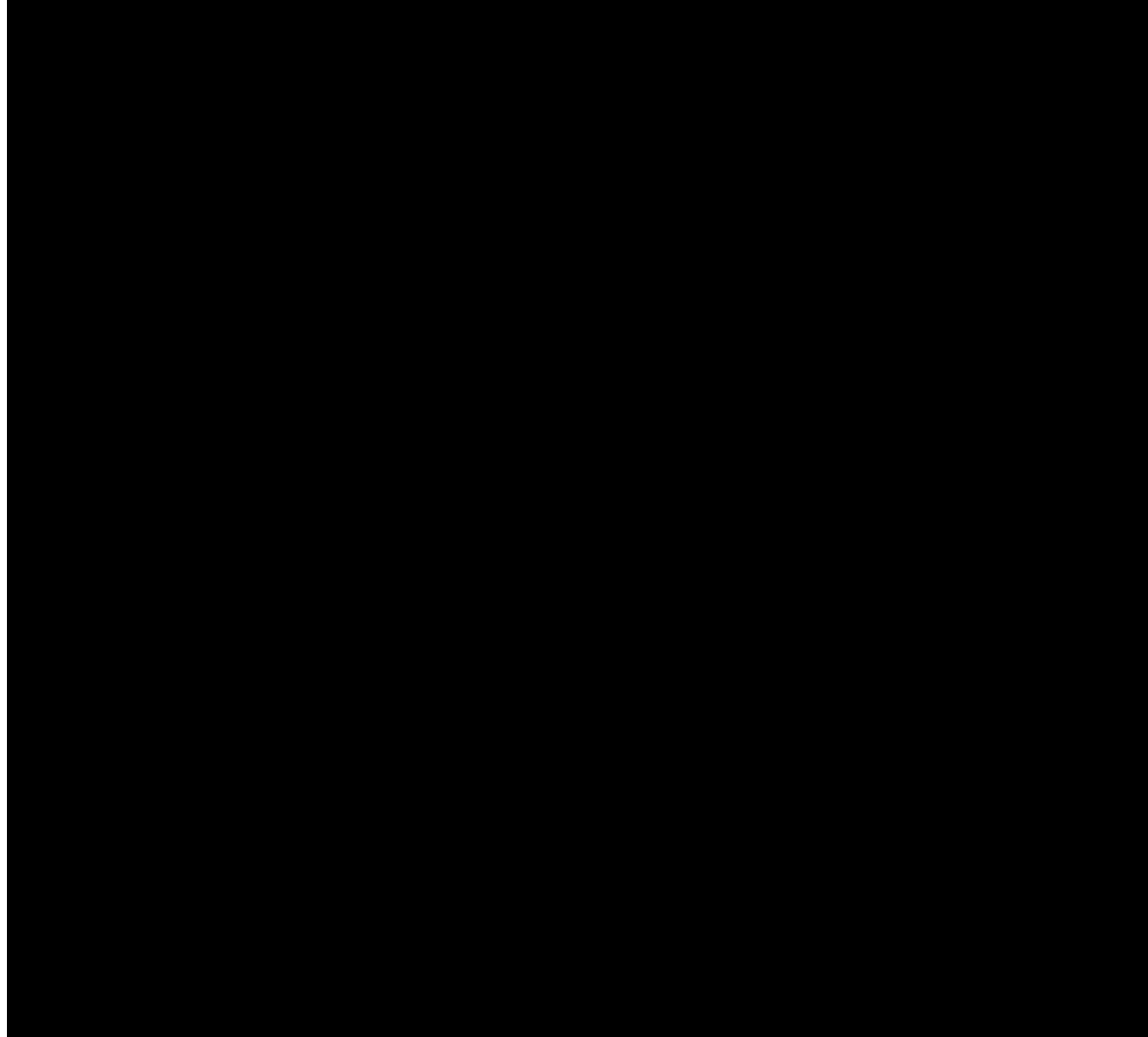


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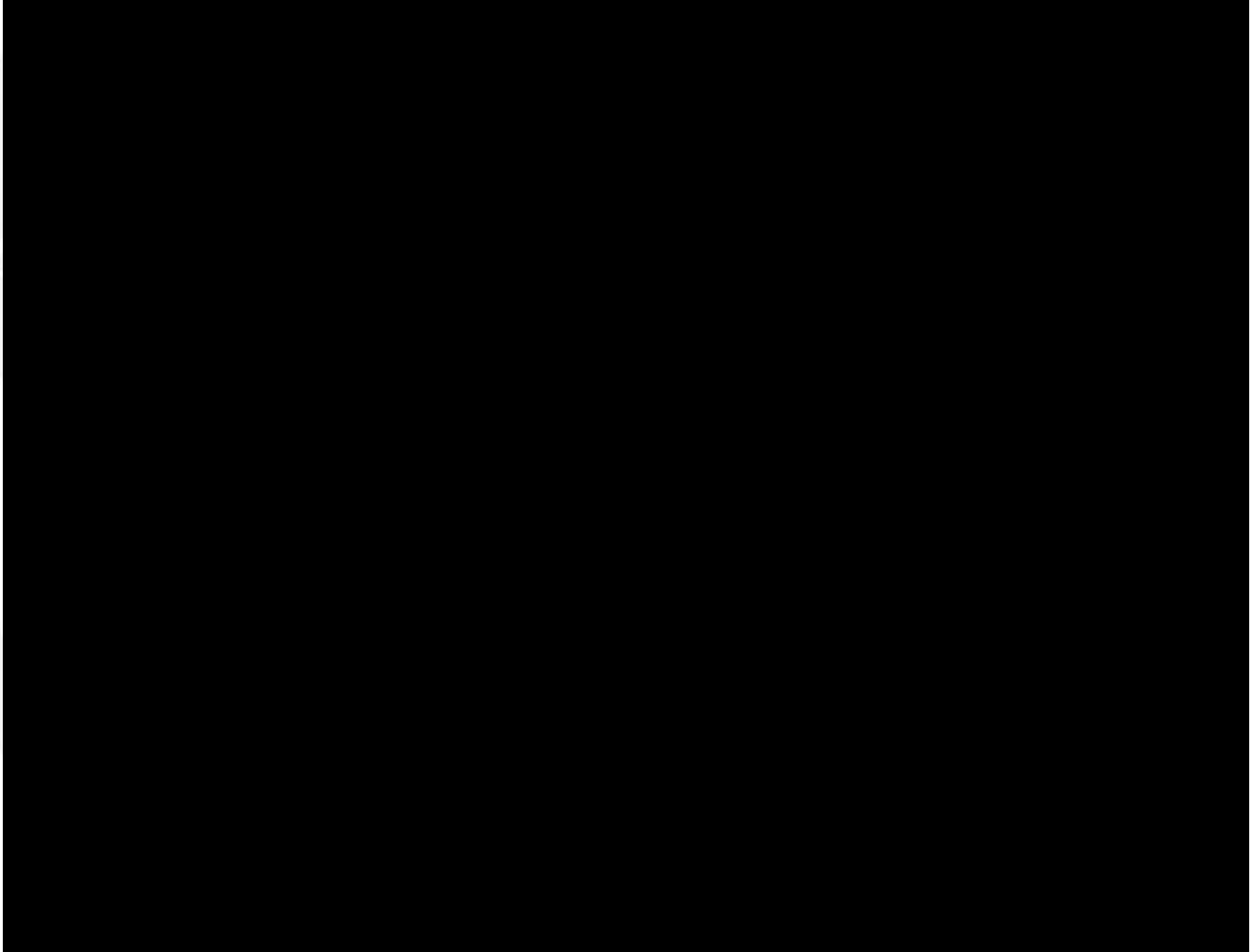
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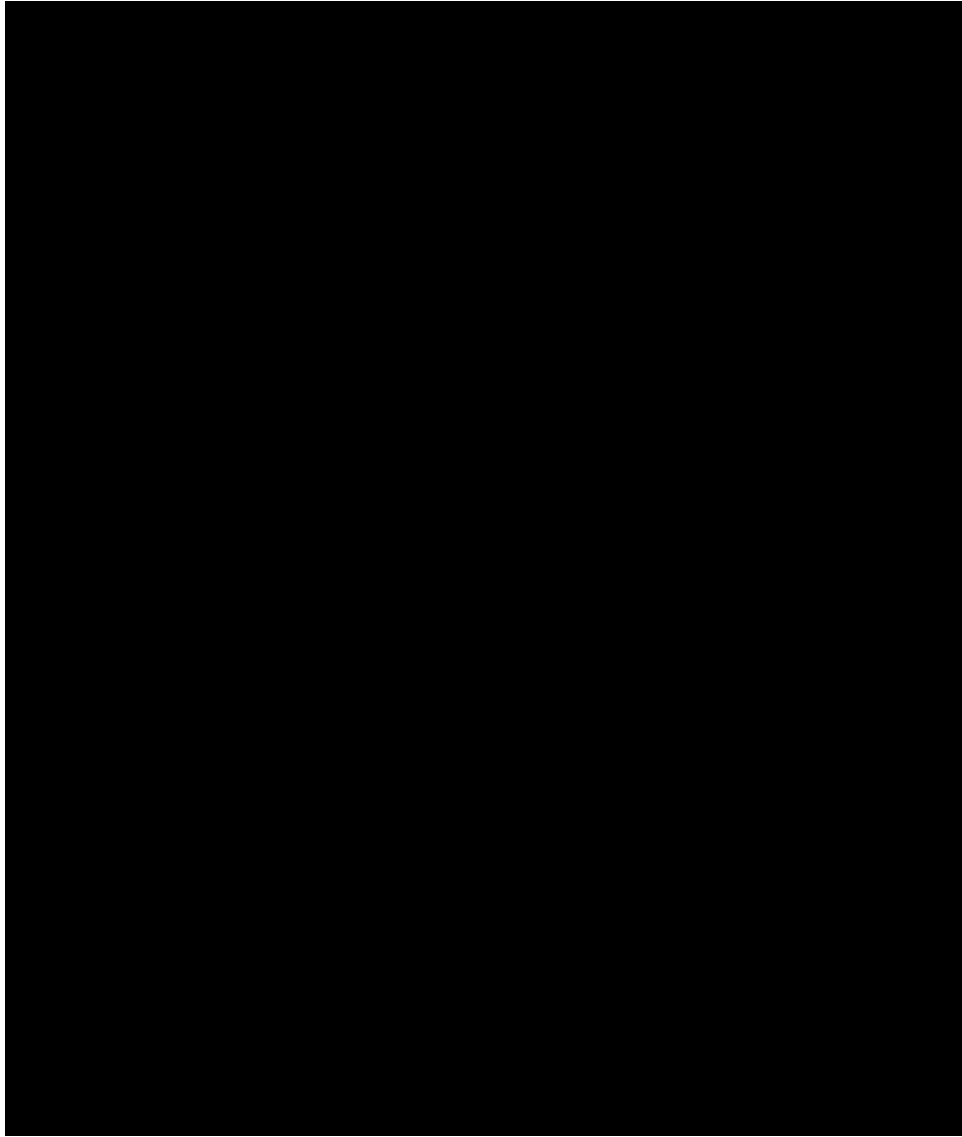
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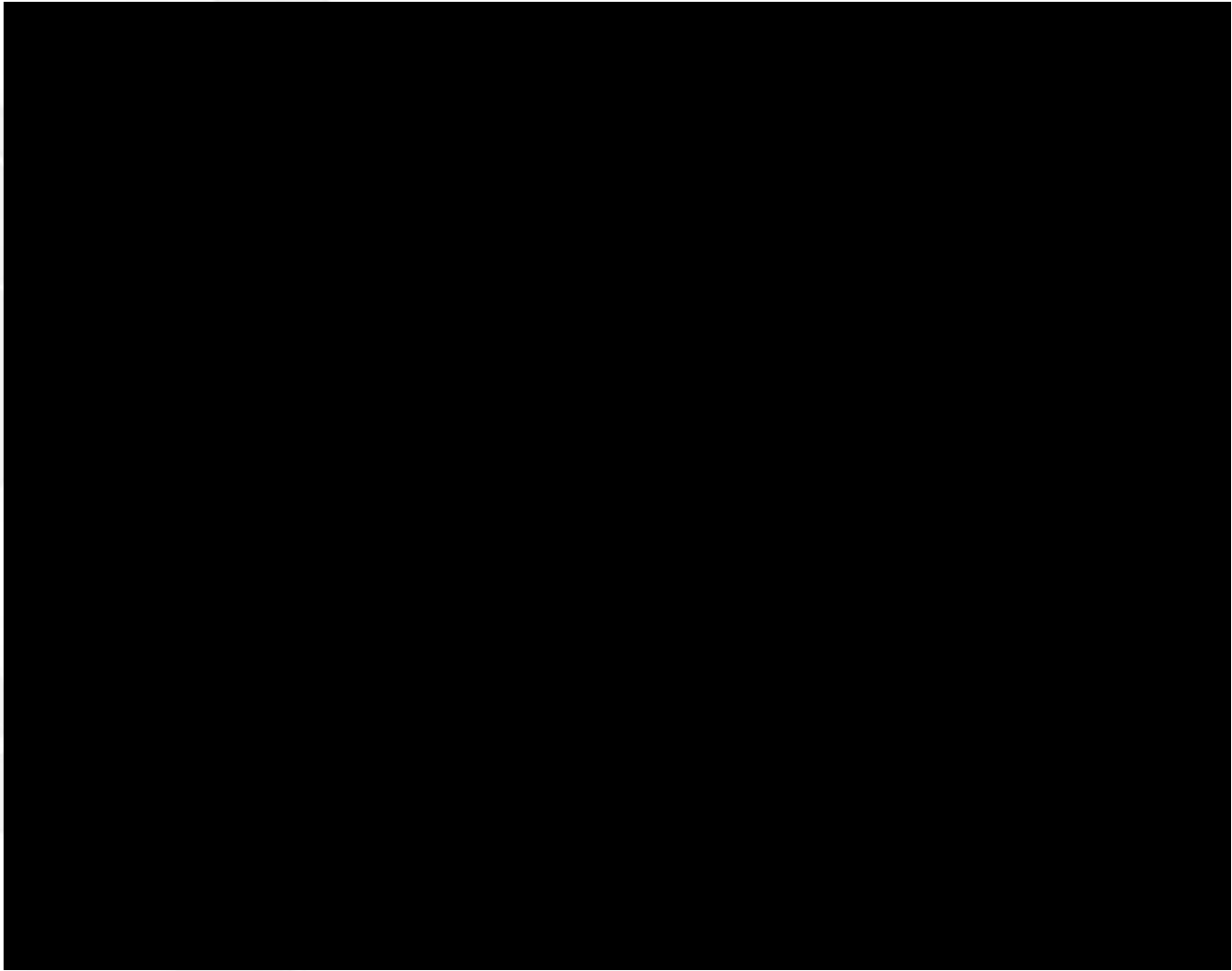
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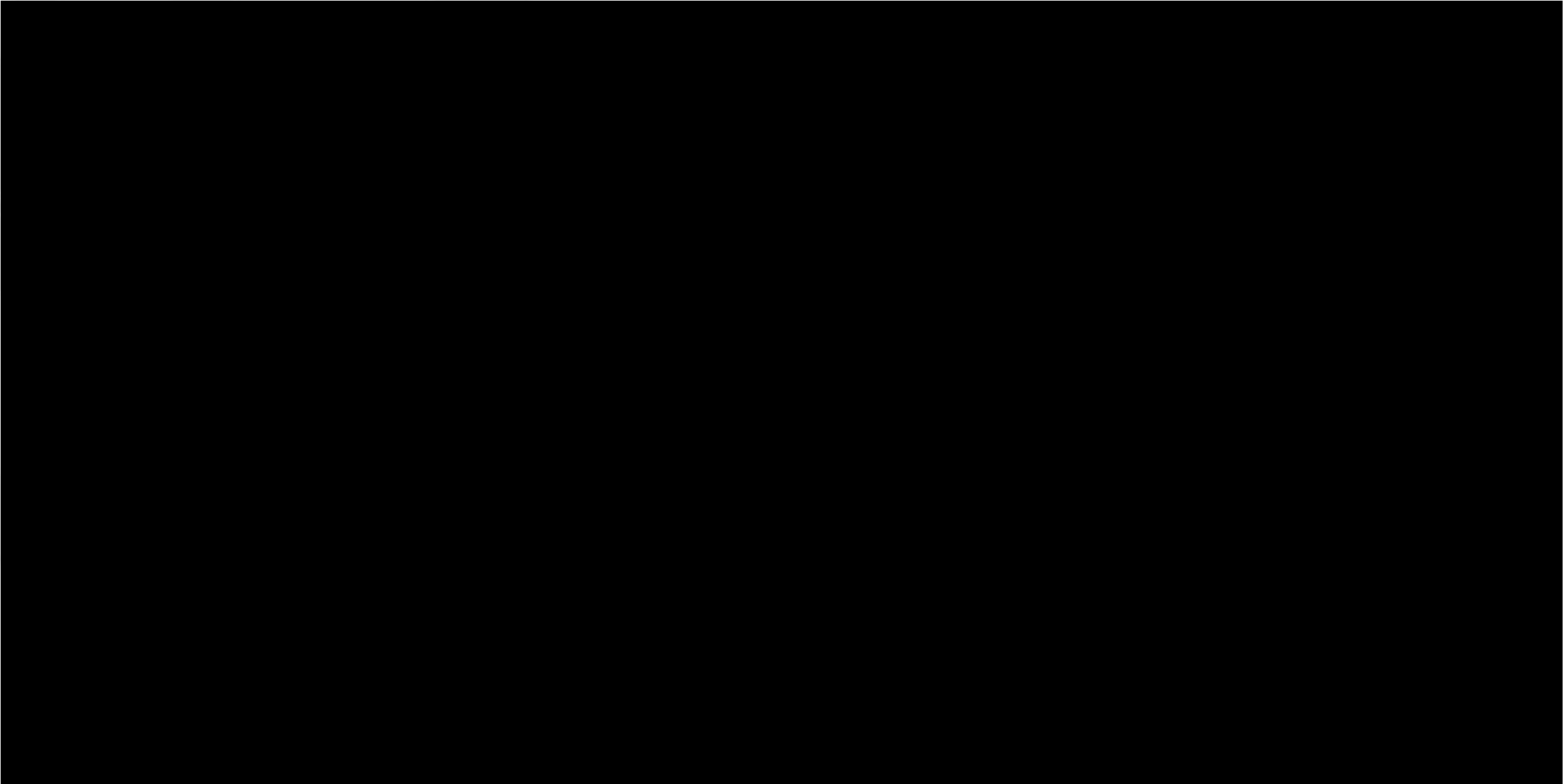
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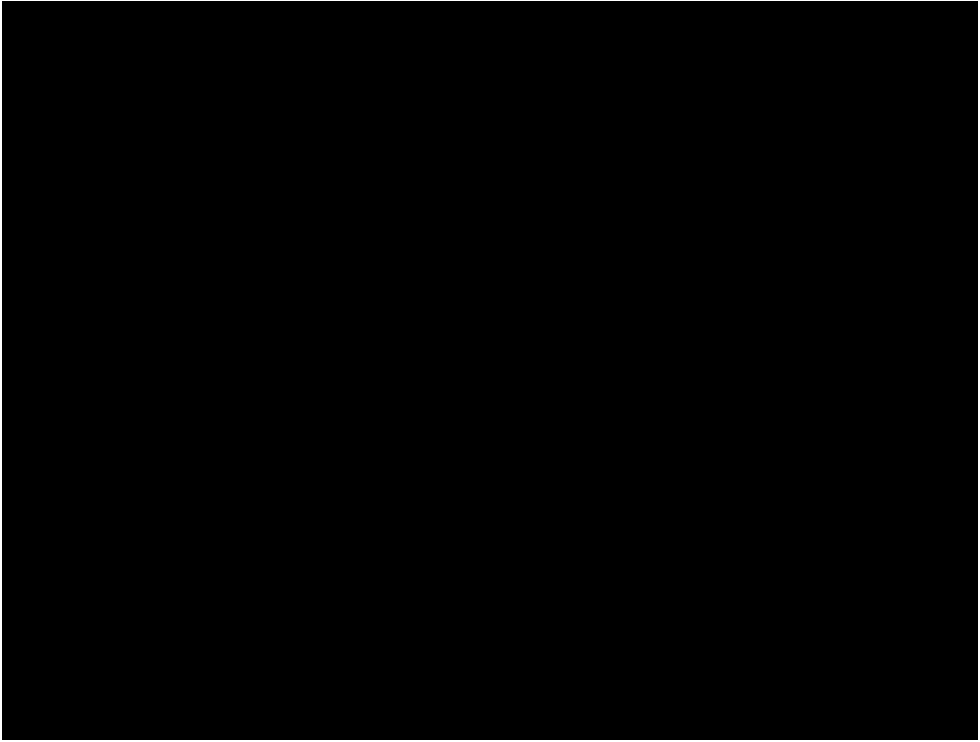
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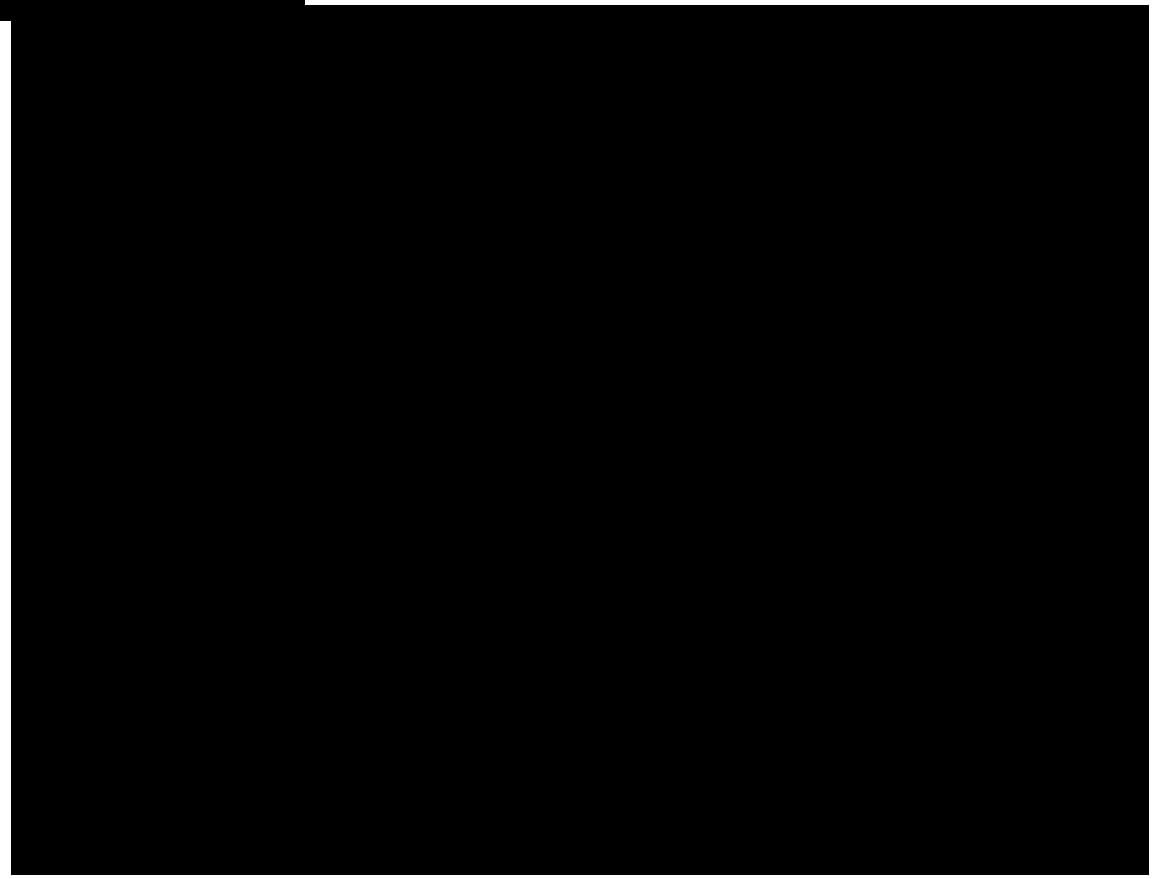


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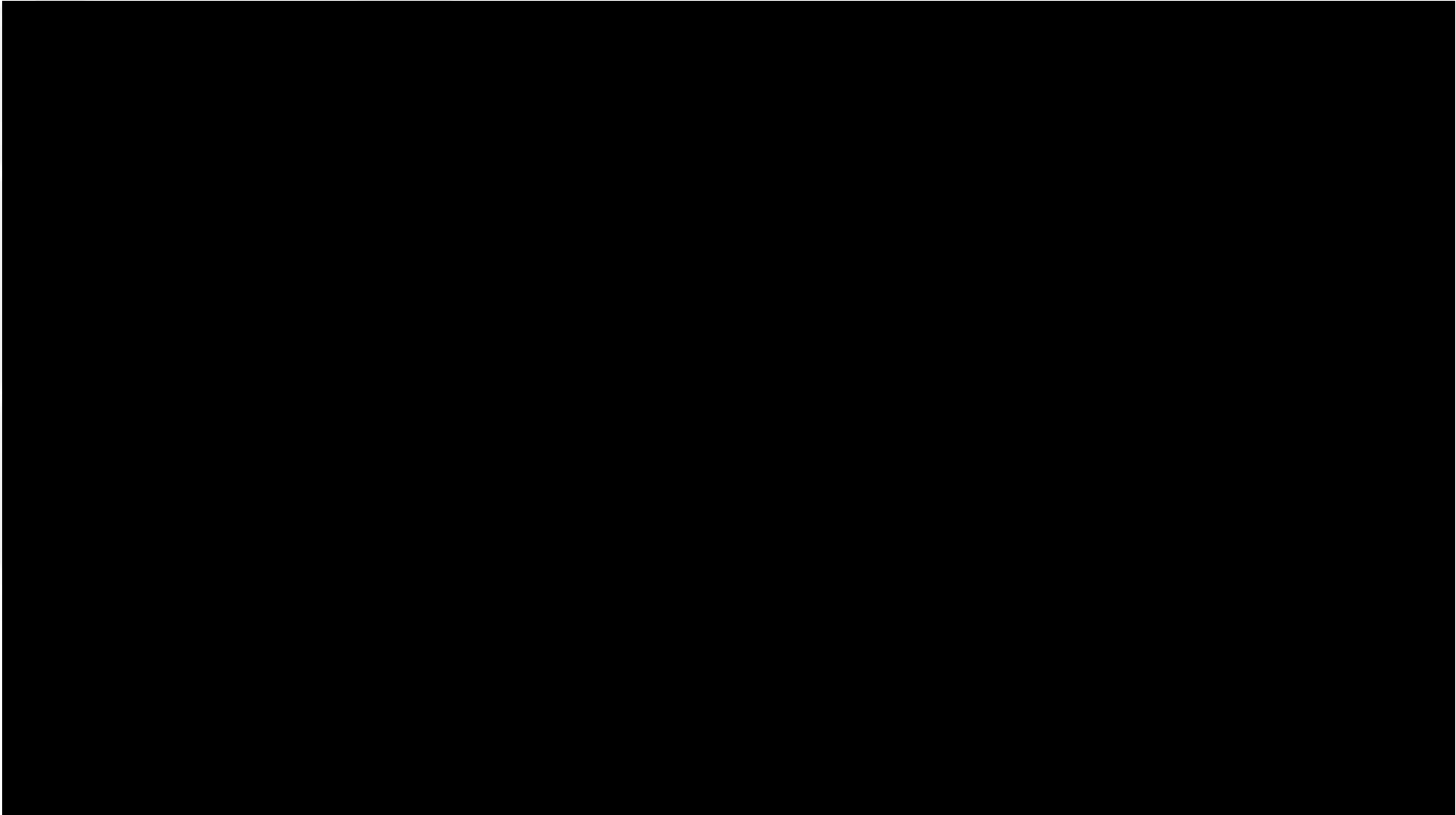
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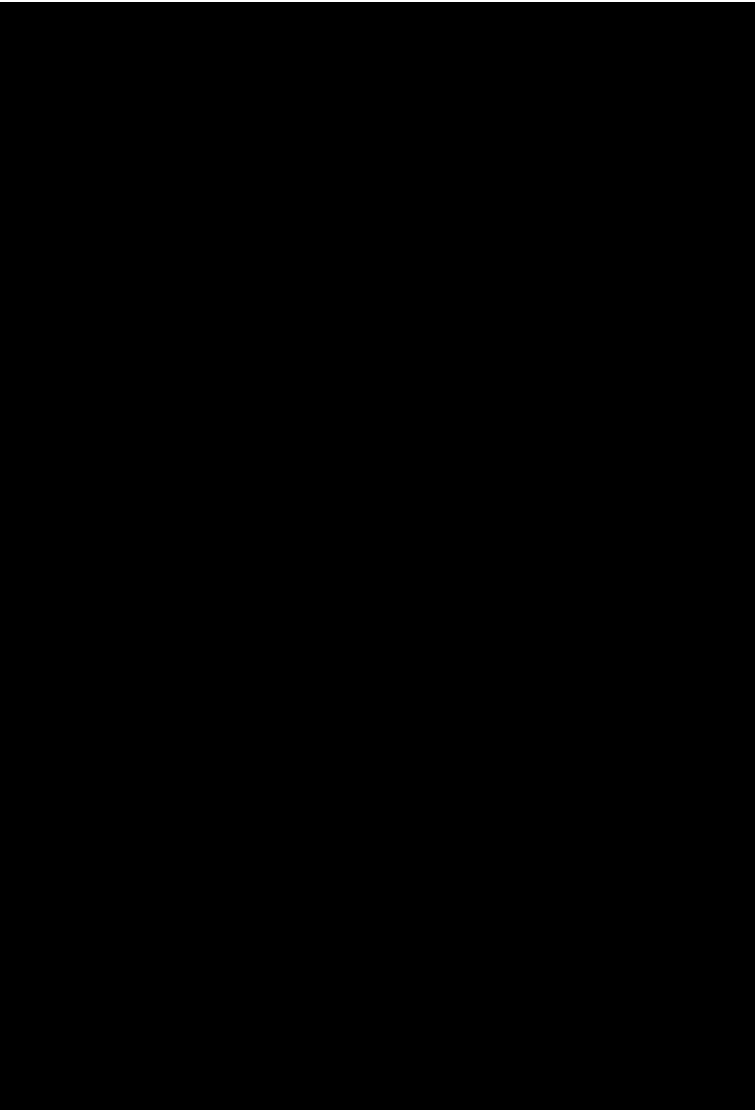
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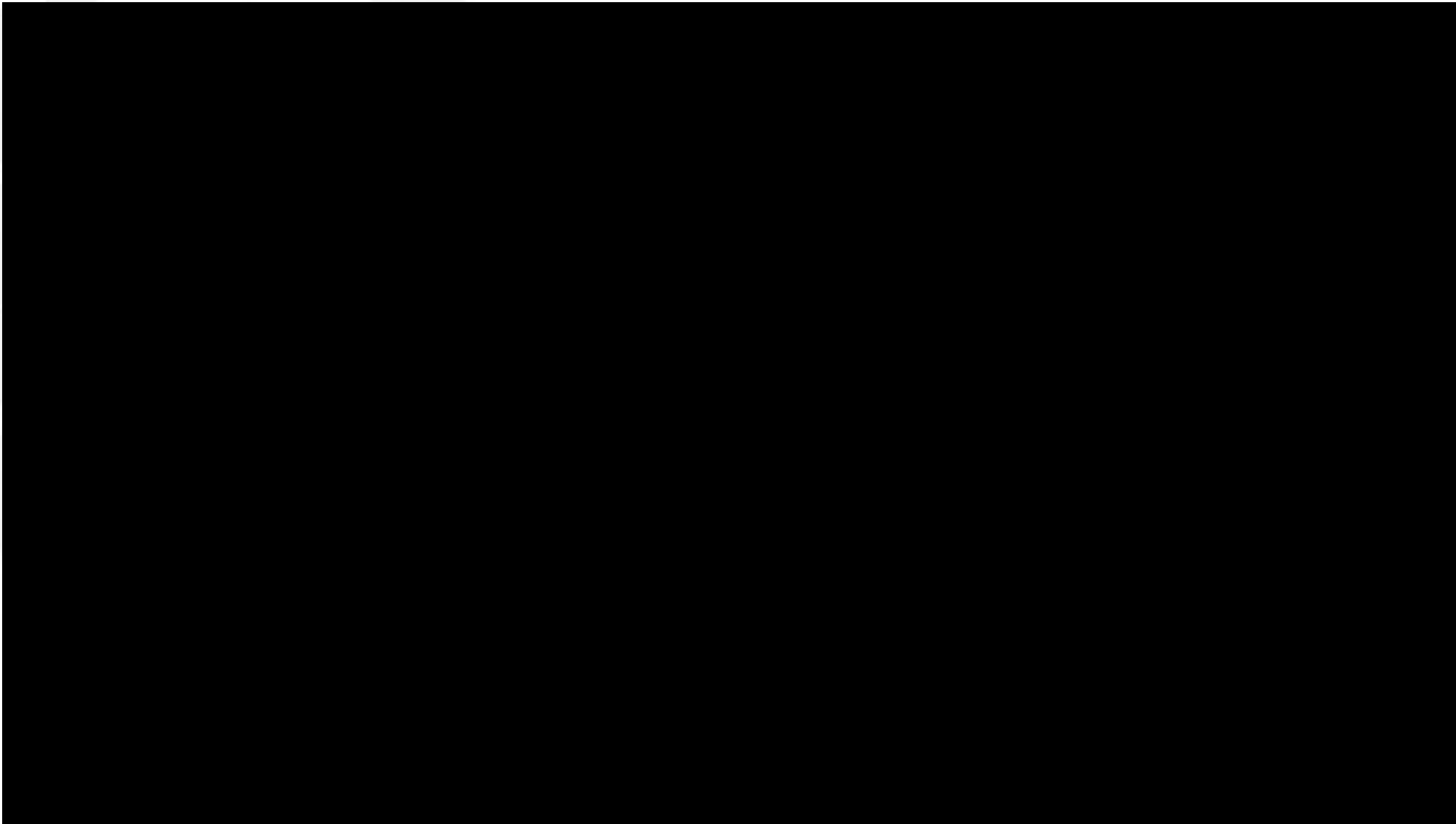
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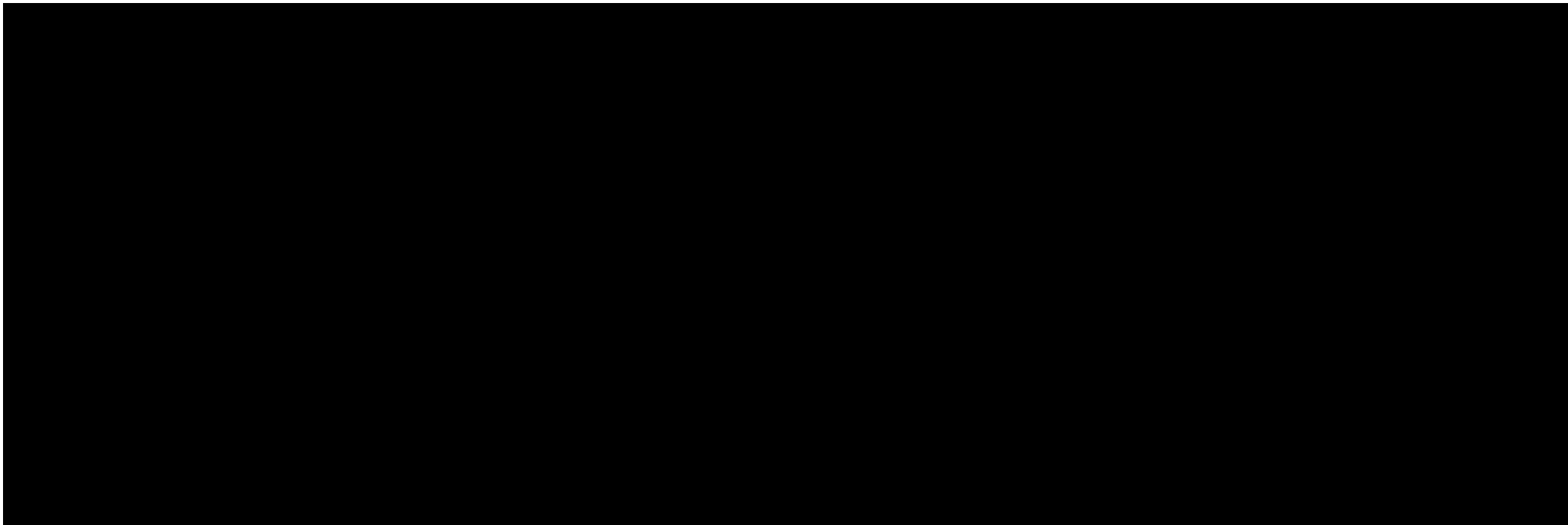
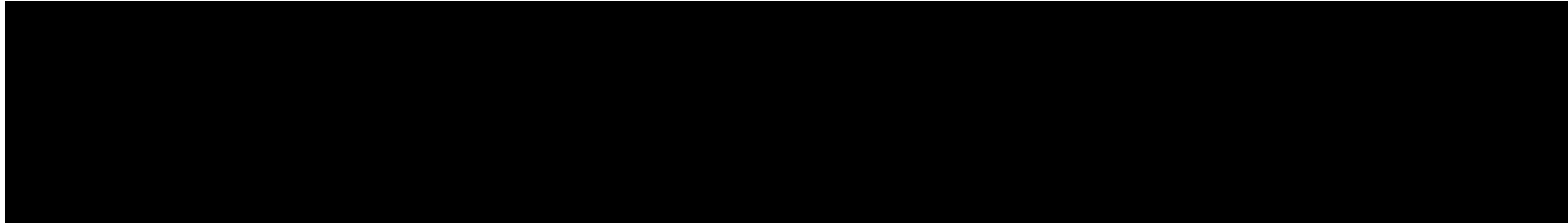
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Hands On Training on Terminals



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Cash Handling

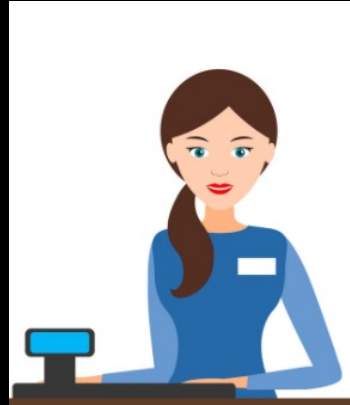
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BELIEVE IN YOUR GAME



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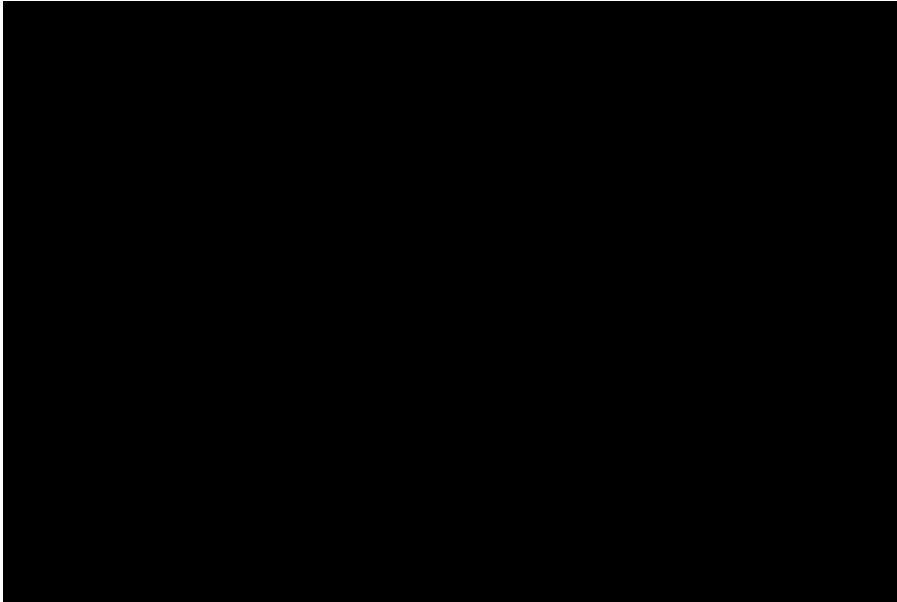
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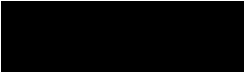
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4-Locked Player

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6 - Send Messages

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7 - End Of Day

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8 - MTL Report

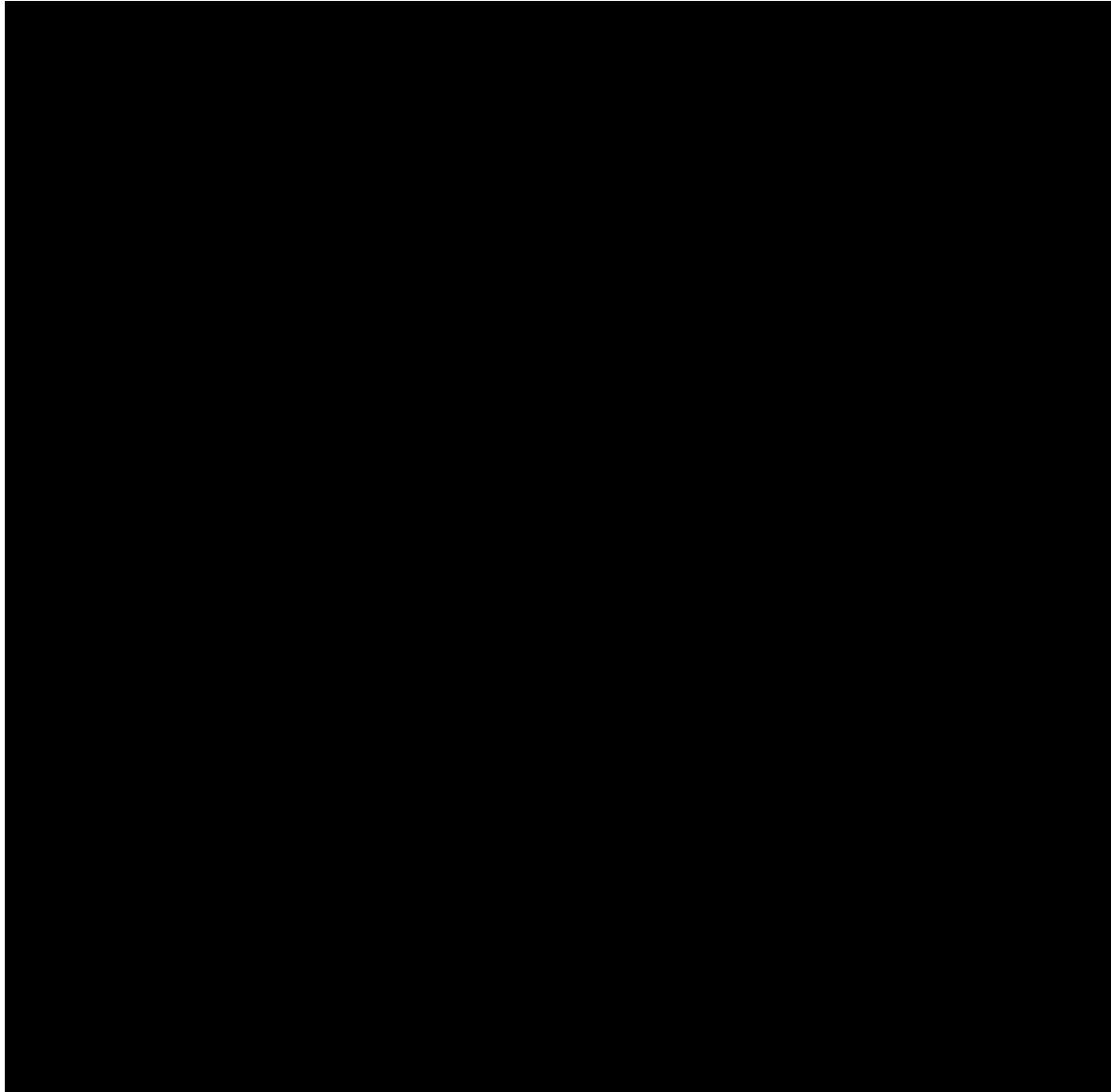
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9 - Supervisor Swipe Cards

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10-Game Center

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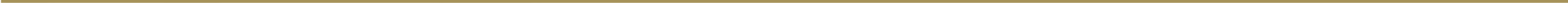
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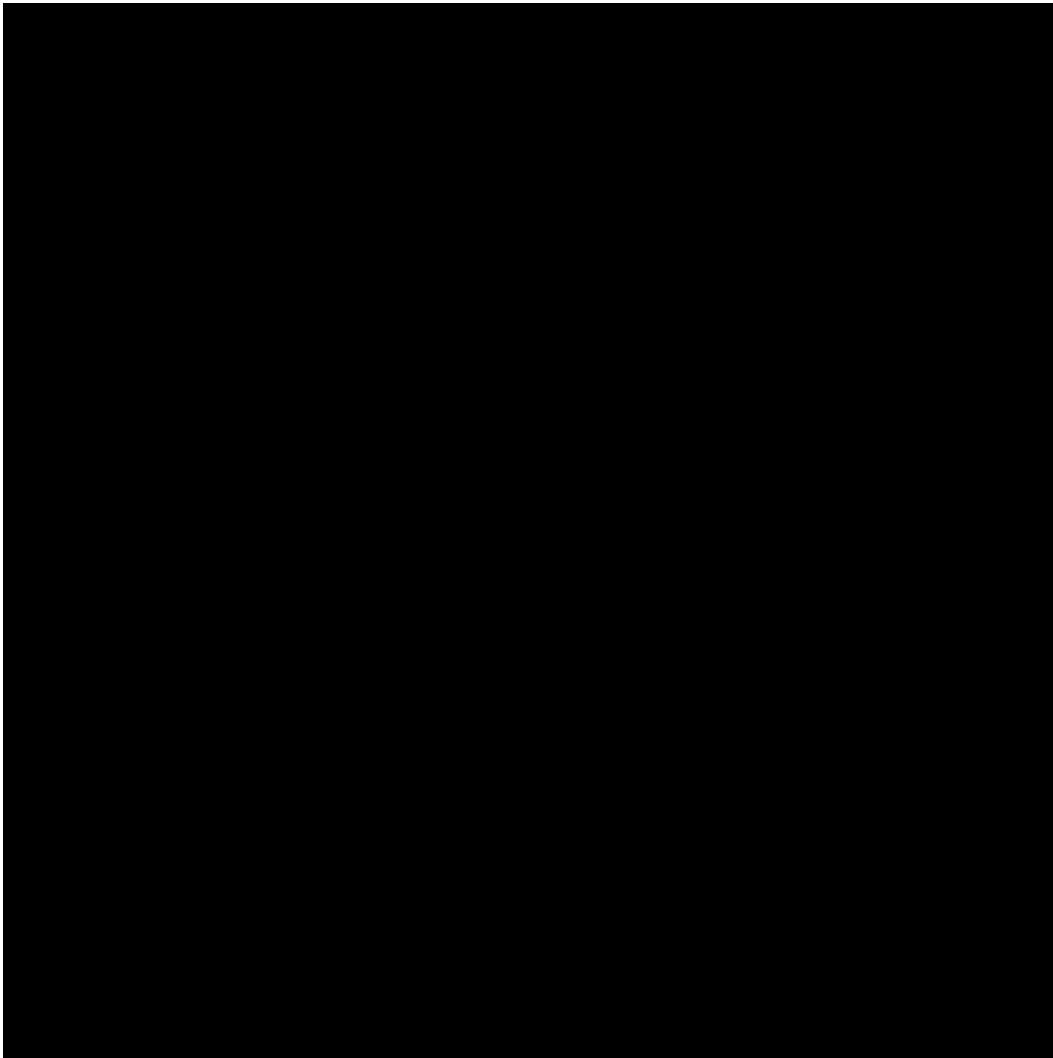
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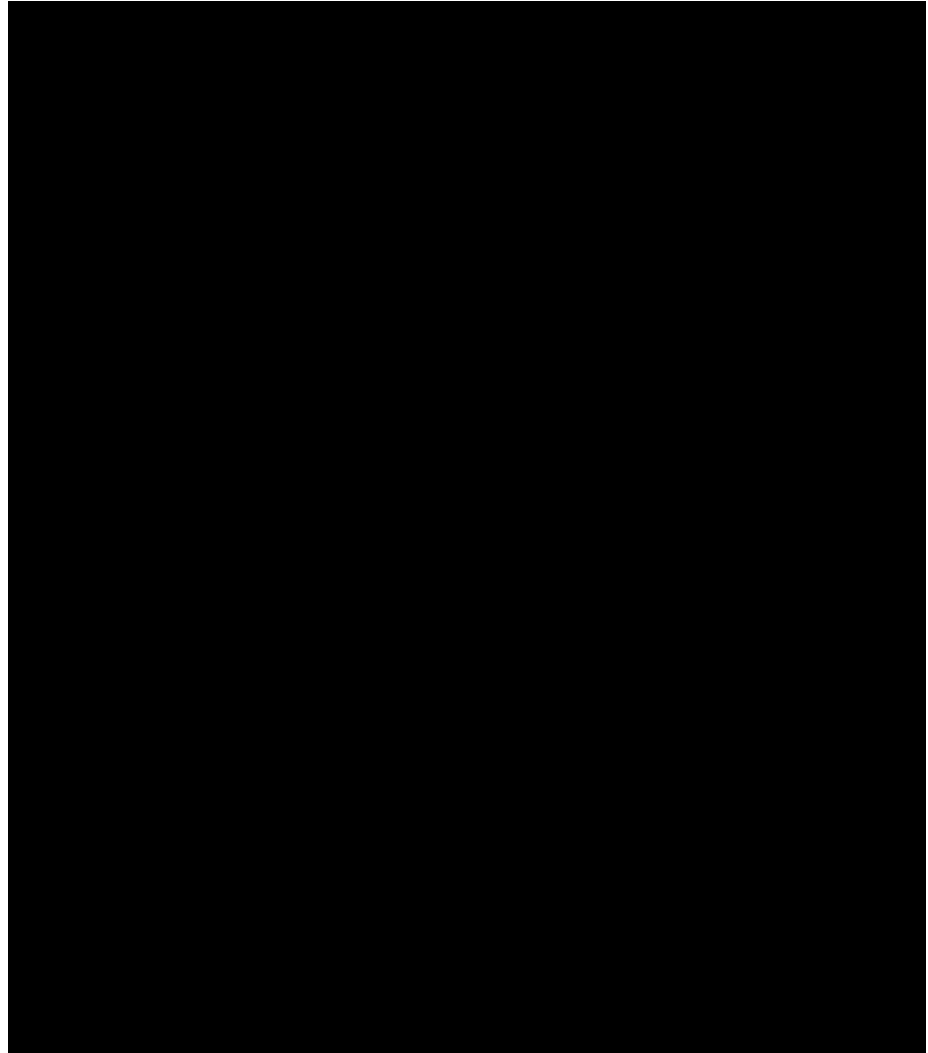
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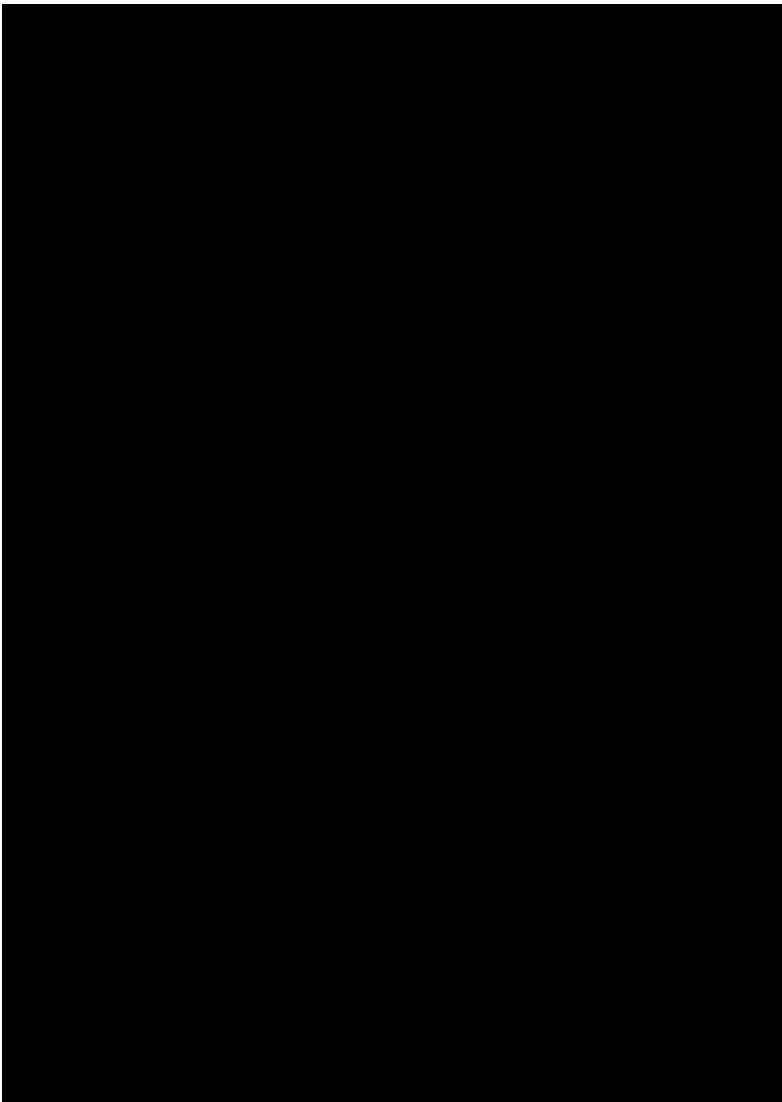
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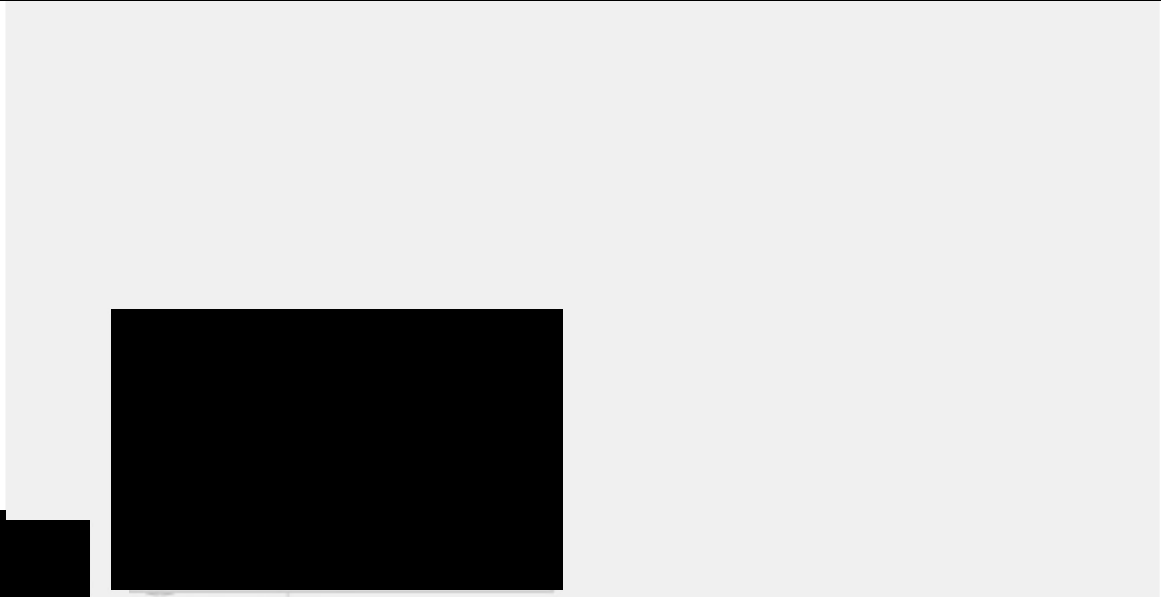


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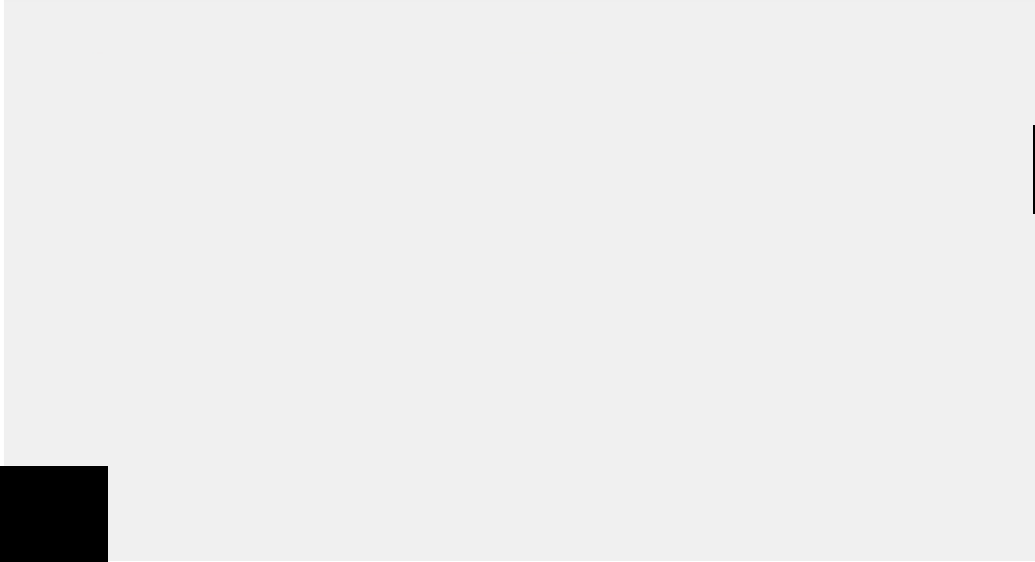
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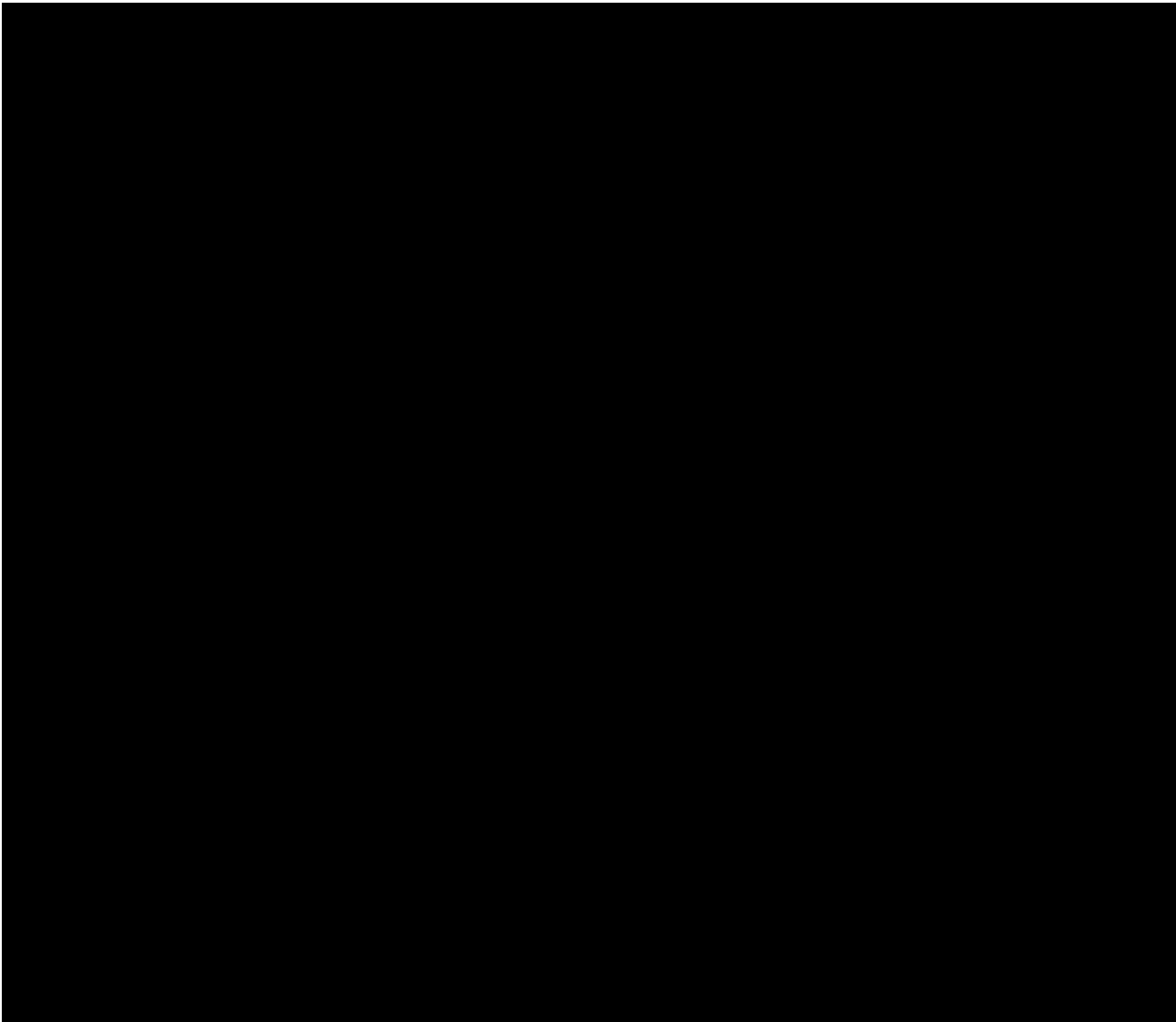
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BETMGM
BELIEVE IN YOUR GAME



**Blue Tarp reDevelopment, LLC d/b/a MGM Springfield
Massachusetts Gaming Commission
Application for Category 1 Sports Wagering Operator License
November 2022**

C.1 EMPLOYMENT OPPORTUNITIES WITHIN THE COMMONWEALTH

Provide a thorough description of the employment opportunities that will be offered if the applicant is approved for licensure by the Commission. This should include the following:

f. The number of proposed work locations that will be created within the Commonwealth

MGMS will operate one work location within Massachusetts.



**Blue Tarp reDevelopment, LLC d/b/a MGM Springfield
Massachusetts Gaming Commission
Application for Category 1 Sports Wagering Operator License
November 2022**

C.1 EMPLOYMENT OPPORTUNITIES WITHIN THE COMMONWEALTH

Provide a thorough description of the employment opportunities that will be offered if the applicant is approved for licensure by the Commission. This should include the following:

- g. Description of plans for workforce development opportunities for Applicant’s staff within the Commonwealth**

MGMS will continue its workforce development initiatives in the region, including partnerships with Holyoke Community College, Springfield Technical Community College, and Springfield Public Schools. Additional partnerships include MassHire Springfield, MassHire Holyoke, Springfield Works, Dress for Success, and the Hampden County Sheriff’s Department.

In addition to existing practices of recruitment, MGMS has embarked on a new workforce recruitment campaign branded to compliment our guest facing marketing. The program is called, “Where Fun Comes to Work.” and it plays on both the real “fun” experience of working at MGM Springfield and indeed in the Gaming, Entertainment and Hospitality industry as a whole.





**Blue Tarp reDevelopment, LLC d/b/a MGM Springfield
Massachusetts Gaming Commission
Application for Category 1 Sports Wagering Operator License
November 2022**

C.1 EMPLOYMENT OPPORTUNITIES WITHIN THE COMMONWEALTH

Provide a thorough description of the employment opportunities that will be offered if the applicant is approved for licensure by the Commission. This should include the following:

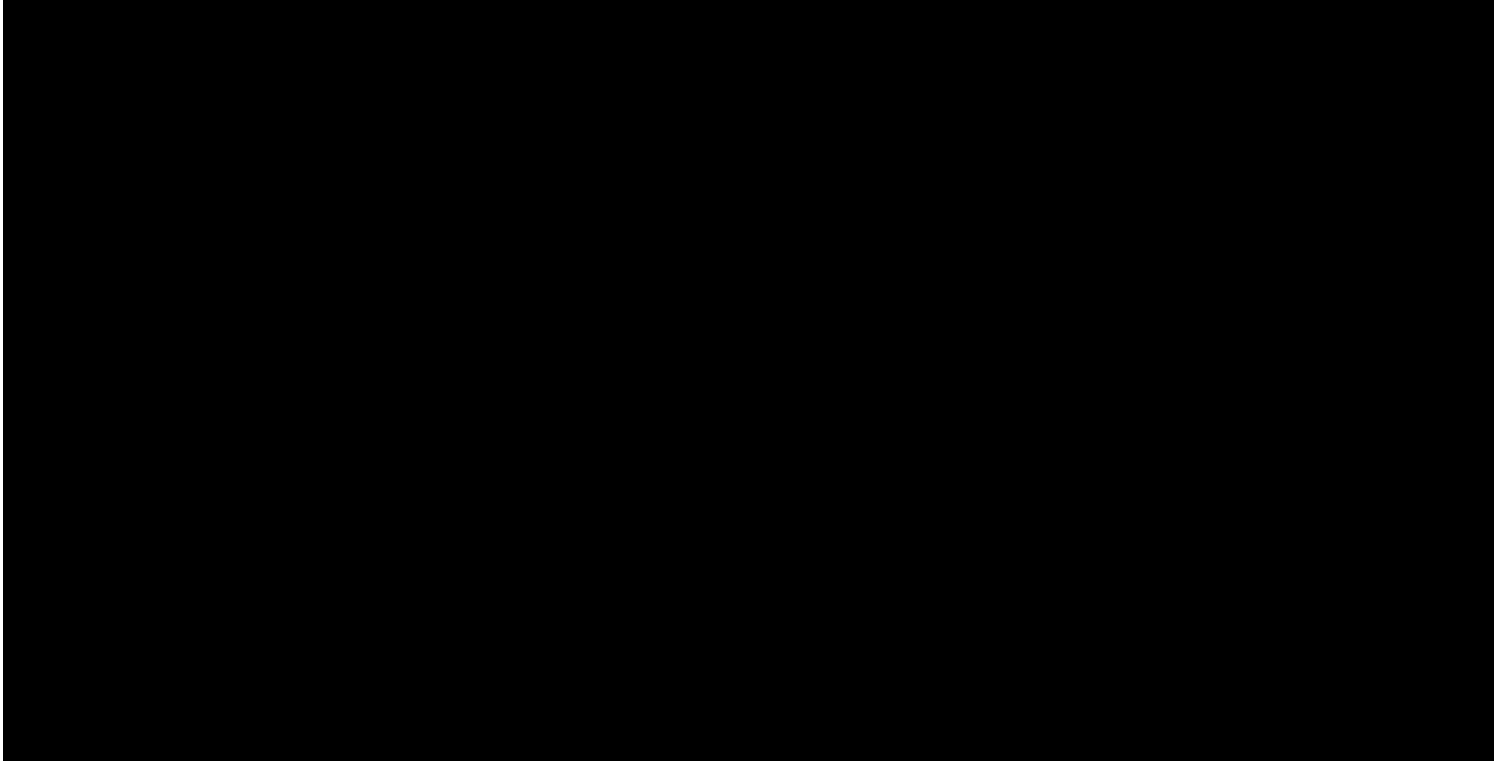
- h. Outline the strategy for focusing on job opportunities and training in areas and demographics with high unemployment and/or underemployment**

MGMS will continue its partnership with the MassHire Career Centers in Springfield and Holyoke by attending regional job fairs, leveraging the JobQuest platform, and having in-person visibility within the centers. Through its partnership with Springfield Works, MGMS will continue to connect candidates with potential local training programs to build or expand skills to meet minimum requirements for technical and skilled positions.





**Blue Tarp reDevelopment, LLC d/b/a MGM Springfield
Massachusetts Gaming Commission
Application for Category 1 Sports Wagering Operator License
November 2022**





**Blue Tarp reDevelopment, LLC d/b/a MGM Springfield
Massachusetts Gaming Commission
Application for Category 1 Sports Wagering Operator License
November 2022**

C.2 PROJECTED REVENUE

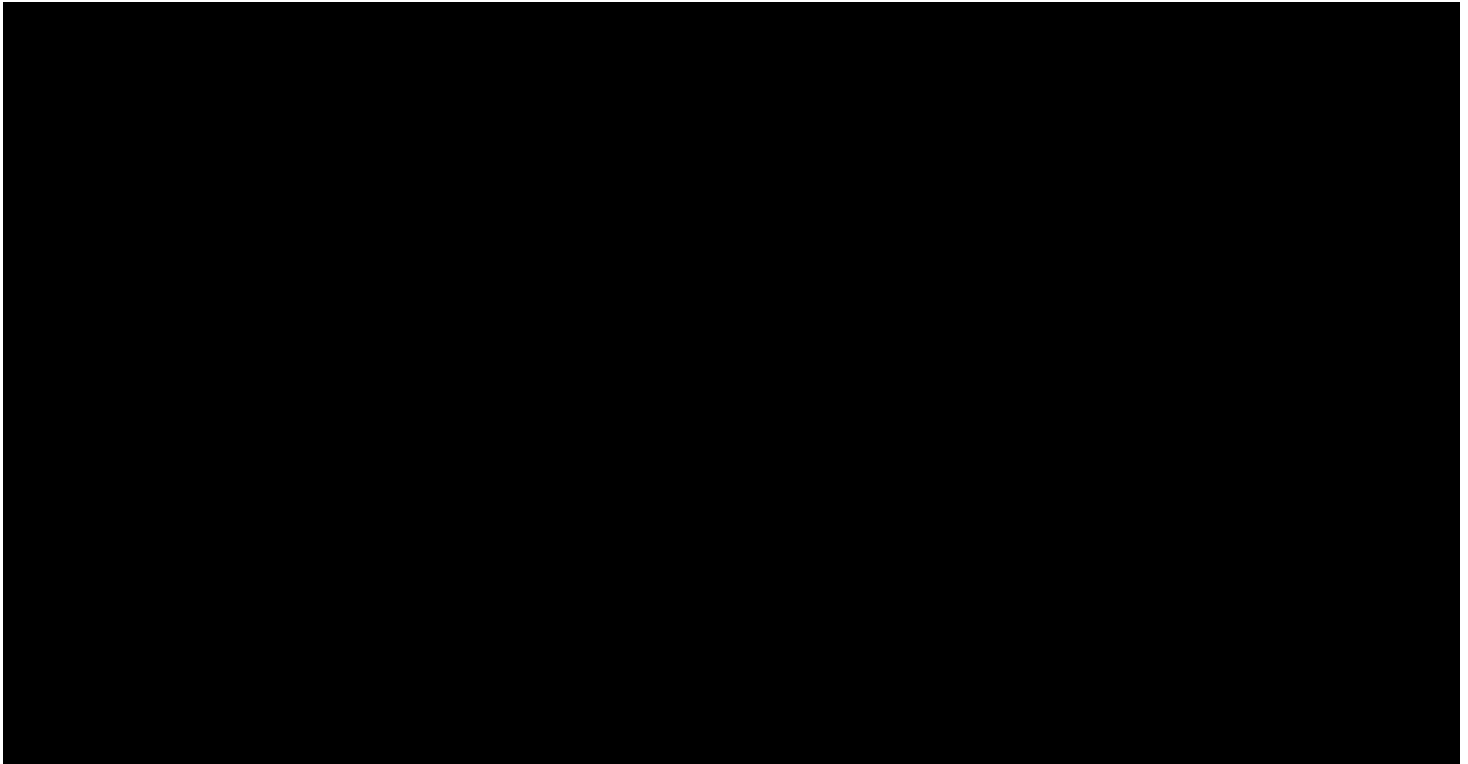
Provide studies and projections for gross sports wagering revenue for each of the first five years of wagering operations on a best, average, and worst, case basis. The studies and information provided should include:

- b. Projected figures for any non-sports wagering revenue and methodology used to arrive at these projections**





**Blue Tarp reDevelopment, LLC d/b/a MGM Springfield
Massachusetts Gaming Commission
Application for Category 1 Sports Wagering Operator License
November 2022**



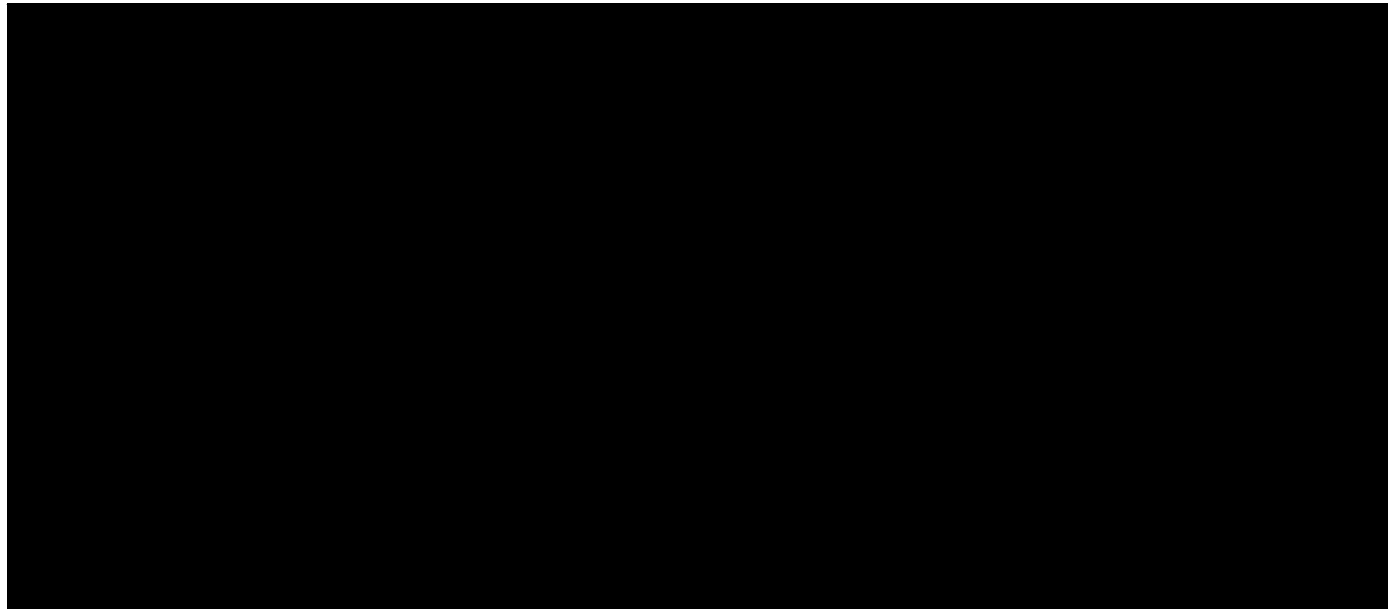


**Blue Tarp reDevelopment, LLC d/b/a MGM Springfield
Massachusetts Gaming Commission
Application for Category 1 Sports Wagering Operator License
November 2022**

C.2 PROJECTED REVENUE

Provide studies and projections for gross sports wagering revenue for each of the first five years of wagering operations on a best, average, and worst, case basis. The studies and information provided should include:

- d. Profitability of sports wagering operation (in-person & mobile) in other jurisdictions where the applicant is licensed**
- e. History of operating performance versus revenue projections for the last five years for other jurisdictions where the platform is licensed – *includes documentation outlining the applicant’s record of success or failure in meeting the performance objectives***





**Blue Tarp reDevelopment, LLC d/b/a MGM Springfield
Massachusetts Gaming Commission
Application for Category 1 Sports Wagering Operator License
November 2022**

C.2 PROJECTED REVENUE

Provide studies and projections for gross sports wagering revenue for each of the first five years of wagering operations on a best, average, and worst, case basis. The studies and information provided should include:

- f. Description of methods to ensure that revenues are maximized within the Commonwealth**
- g. Description of plans to compete with other nearby jurisdictions and to market to Massachusetts patrons**

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Massachusetts Marketing Plan

November 2022

BetMGM Sports – Promotions Strategy





MGM/BetMGM Rewards

Earn whether you're in the BetMGM app or in one of over 20 MGM properties in Las Vegas & Nationwide.

Program Overview

EARN REWARDS EVERYWHERE YOU PLAY

As a BetMGM Rewards member, you're also automatically enrolled¹ into MGM Rewards, the loyalty program of MGM Resorts. Double up and stack those rewards high by earning both BetMGM Rewards Points and MGM Rewards Tier Credits for your online play at BetMGM.

Redeem Rewards Points for bonus credits toward sports, casino or poker play at BetMGM, or convert them into MGM Rewards Points redeemable for complimentary food and beverage, entertainment, hotel stays and more.

At the same time, earn Tier Credits to unlock new MGM Rewards Tiers for exclusive benefits, including waived resort fees, tickets to MGM Rewards concerts, room upgrades, and more at over 20 MGM Resort properties in Las Vegas and nationwide.



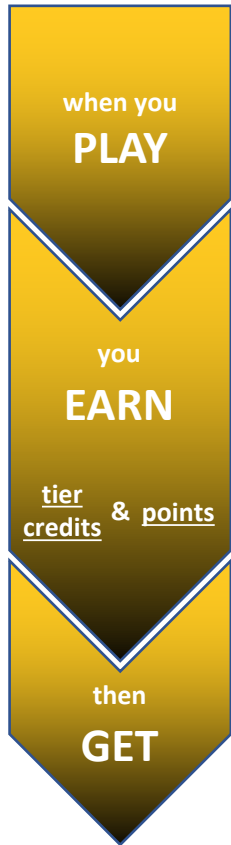
Point Earning & Tier Benefits

How Are MGM and BetMGM Interconnected?

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With our strategy of focusing on rewards and the joint value proposition, this chart distills key interrelationships

HOW DO I GET REWARDS?



<u>MGM Rewards</u> <i>(20+ luxury resorts in Las Vegas and nationwide)</i>	<u>BetMGM Rewards</u> <i>(online in AZ, CO, DC, IA, IN, LA, MI, MS, NJ, NV, PA, TN, VA, VW, VY plus physical sportsbooks in many states)</i>
Play slots, table games, stay, or dine at MGM Resorts nationwide ¹	Play online casino games, poker, or wager on sports in the BetMGM app, OR wager on sports at BetMGM Sportsbook locations nationwide
<p>Earn MGM Rewards Tier Credits when you play at MGM Resorts or online at BetMGM. Tier Credits track your progress toward unlocking new MGM Rewards tiers. Every MGM Rewards Tier you unlock entitles you to benefits across MGM Resorts and BetMGM. Unlock a new tier by playing at home with BetMGM, then enjoy the benefits of that tier when you visit MGM Resorts.</p>	
Earn MGM Rewards Points	Earn BetMGM Rewards Points
Redeem MGM Rewards Points for: hotel accommodations, dining, entertainment and more at over 20 MGM Resorts in Las Vegas and nationwide	Redeem BetMGM Rewards Points for: online free play OR transfer them into MGM Rewards Points

¹ or generate other qualifying non-gaming spend on hotel, food & beverage, etc. Visit mgmrewards.com for more details.

BetMGM : Earning Points Across All Products

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For MA: Only Sports Applicable

	Wager on the BetMGM App or BetMGM.com...	and Receive ² ...
Sports	\$100 in a Straight Bet ¹ ...	at least 20 BetMGM Rewards Points (or even more, with longer odds) and 20 Tier Credits
	\$100 in a Parlay ¹ ...	at least 50 BetMGM Rewards Points (or even more, with longer odds) and 50 Tier Credits
Casino*	\$100 in Regular Slots and Instant Win Games...	up to 20 BetMGM Rewards Points and 20 Tier Credits
	\$100 in Progressive Jackpot Slots...	up to 10 BetMGM Rewards Points and 10 Tier Credits
	\$100 in Live Table Games, like Baccarat, Blackjack, Craps, Roulette, Live Casino Slot Games and Video Poker...	up to 4 BetMGM Rewards Points and 4 Tier Credits
Poker*	Pay \$100 in Cash Game Rake...	up to 500 BetMGM Rewards Points and 500 Tier Credits
	Pay \$100 in Tournament Fees...	up to 500 BetMGM Reward Points and 500 Tier Credits

¹ At -110 odds for a straight bet and +300 for a parlay. Sports wagers can award BetMGM Rewards Points and Tier Credit earnings at higher or lower rates based on the odds selection, type of bet and wager amount

² Earning rates can vary based on wager, jurisdiction and/or game played

BetMGM Rewards: Tier Benefit List

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Revised benefit tables for main loyalty landing page emphasize tier benefits in the loyalty value proposition

BetMGM Rewards: Tier Benefits List	Sapphire (0-19,999) Tier Credits	Pearl (20,000+) Tier Credits	Gold (75,000+) Tier Credits	Platinum (200,000+) Tier Credits	NOIR (Invitation Only)
MGM Rewards: When you play with BetMGM, you also become a member of MGM Rewards, the loyalty program of MGM Resorts!	X	X	X	X	X
Tier Credits: Whether you play at over 20 MGM Resorts nationwide or BetMGM from your mobile phone, you earn Tier Credits toward elite status at MGM and BetMGM for more benefits!	X	X	X	X	X
Access to MGM offers for free or discounted room nights at MGM Resorts via your MGM Rewards account (based on play levels)	X	X	X	X	X
Earn BetMGM Rewards Points that can be redeemed for BetMGM online bonuses or converted to MGM Rewards Points	X	X	X	X	X
BetMGM Rewards Birthday Free Bet: Members receive a free bet on their birthday ¹	\$5	\$10	\$25	\$100	\$200
BetMGM Rewards Anniversary Free Bet: Members receive a free bet on the anniversary of their first real money bet ¹	\$5	\$10	\$25	\$100	\$200
BetMGM Rewards Point Bonus on BetMGM Rewards Points earned via BetMGM play ²		10%	20%	30%	40%
Access to Premium Customer Support			X	X	X
Expedited window service at MGM Resort-based BetMGM Sportsbooks ³				X	X
Access to Dedicated VIP Host for BetMGM					X

¹ In order to be eligible to receive a BetMGM Anniversary Free Bet or BetMGM Birthday Free Bet, you must have at least \$1 in real money wagers within the last 365 days at BetMGM. Member accounts that do not meet this requirement are ineligible for this benefit. The BetMGM Birthday Free Bet is issued on your birthday of record. The BetMGM Anniversary Free Bet is issued on the anniversary of your first wager with BetMGM. Members who have not created an account via the BetMGM app or at BetMGM.com will not be eligible for this benefit. Accounts created in Nevada are ineligible for this benefit. BetMGM is not responsible for errors in the birthday or anniversary date. BetMGM reserves the right, at its sole discretion and without notice, to modify the terms under which this benefit is offered, disqualify player eligibility from this benefit, or revoke this benefit.

² This bonus is automatically awarded for each wager

³ Subject to availability by property

Select MGM Rewards Benefits

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A sample of benefits offered at various tiers reinforces the unique joint value proposition offered by MGM and BetMGM

MGM Rewards: Select Benefits	Sapphire (0-19,999) Tier Credits	Pearl (20,000+) Tier Credits	Gold (75,000+) Tier Credits	Platinum (200,000+) Tier Credits	NOIR (Invitation Only)
Earn MGM Rewards Points when you play, stay, and dine at all MGM Rewards destinations	X	X	X	X	X
Complimentary Tickets to Select Exclusive MGM Rewards Concerts in Las Vegas		X	X	X	X
Exemption from MGM Reward Point Expiration: MGM Rewards Points and Slot Dollars do not expire due to inactivity		X	X	X	X
Complimentary Self-Parking (subject to availability)		X	X	X	X
Complimentary Valet Parking at Participating MGM Rewards destinations (subject to availability)		X	X	X	X
Resort Fee Waived when booking direct			X	X	X
Complimentary enhanced room upgrade at check-in, based on availability (e.g. view rooms, high floor, etc.)			X	X	X
Tier Achievement Celebration Dining Experience for qualifying members			\$100	\$200	\$500
Complimentary Early Check-in upon request (1:00 PM based on availability, 24-hour notice required)				X	X
Complimentary Late Check Out (4:00 PM based on availability)				X	X
Air Travel Credit to Las Vegas once a year for qualifying Platinum and NOIR members				Up to \$600	Up to \$1,200
One Advanced Suite Upgrade in Las Vegas per year, up to 3-night stay				X	X
Expedited access to Valet/Taxi				X	X

Massachusetts Advertising Media Strategy

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Massachusetts Advertising Plan

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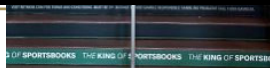
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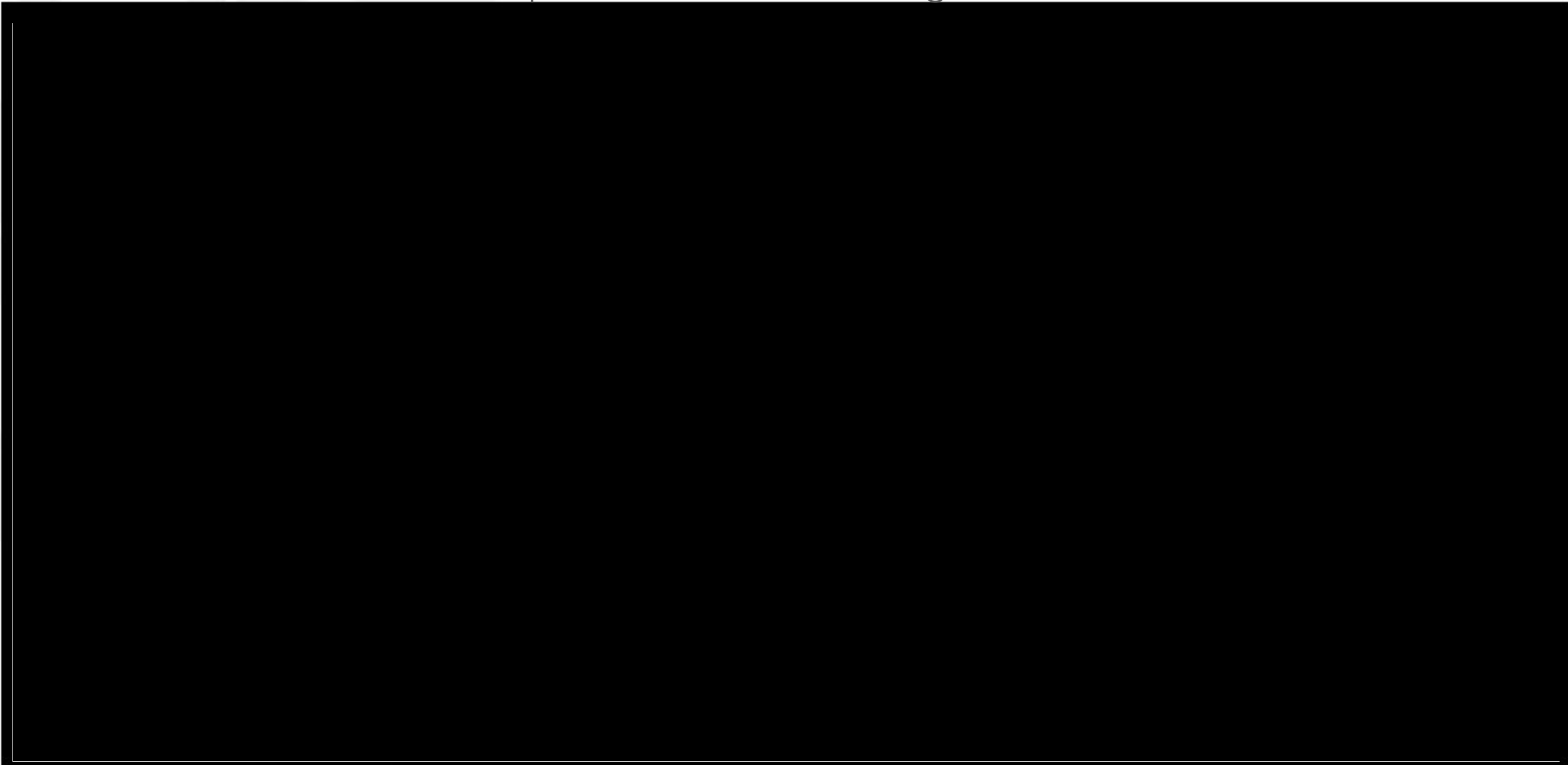
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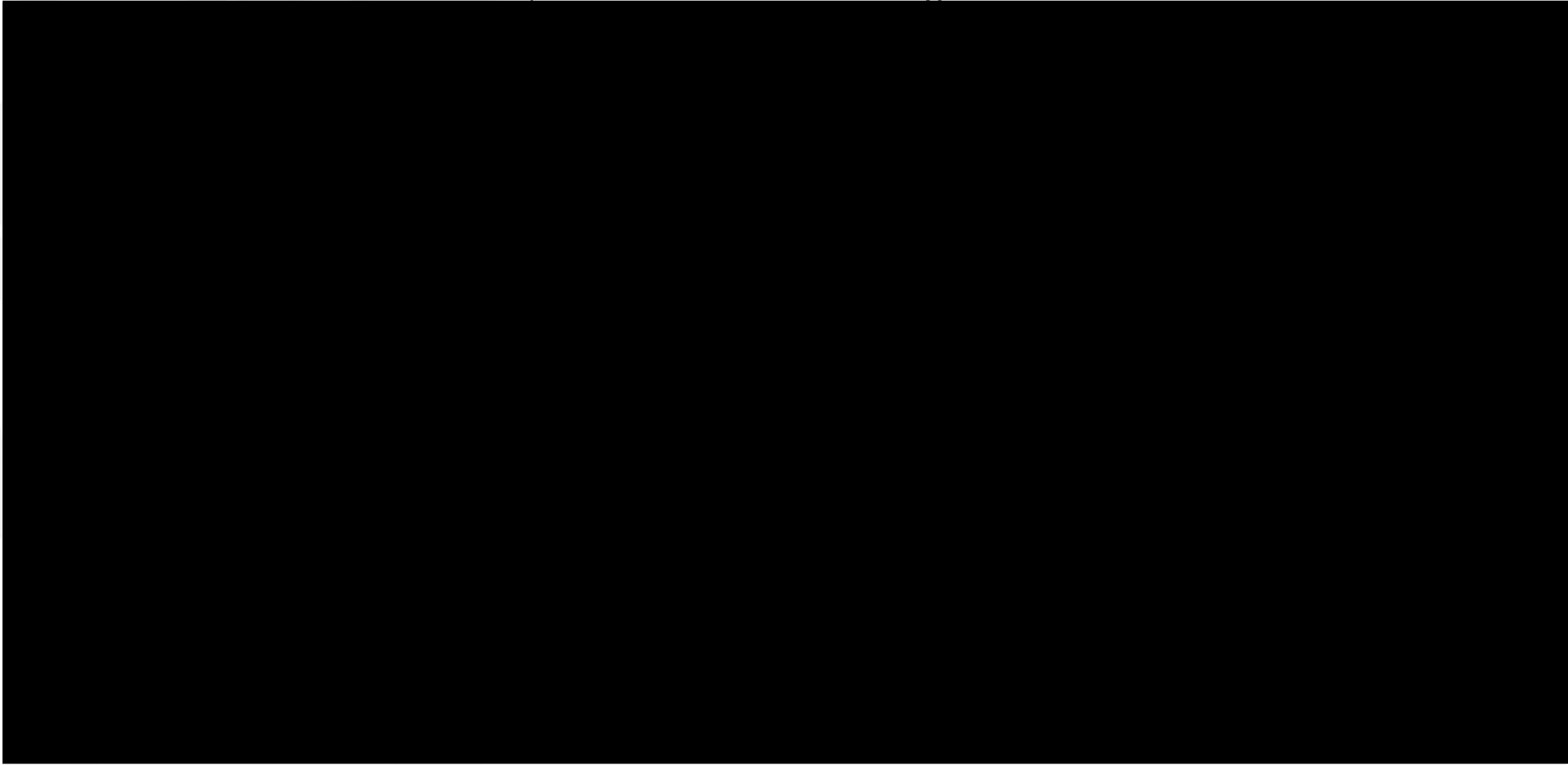
Responsible Gambling Plan

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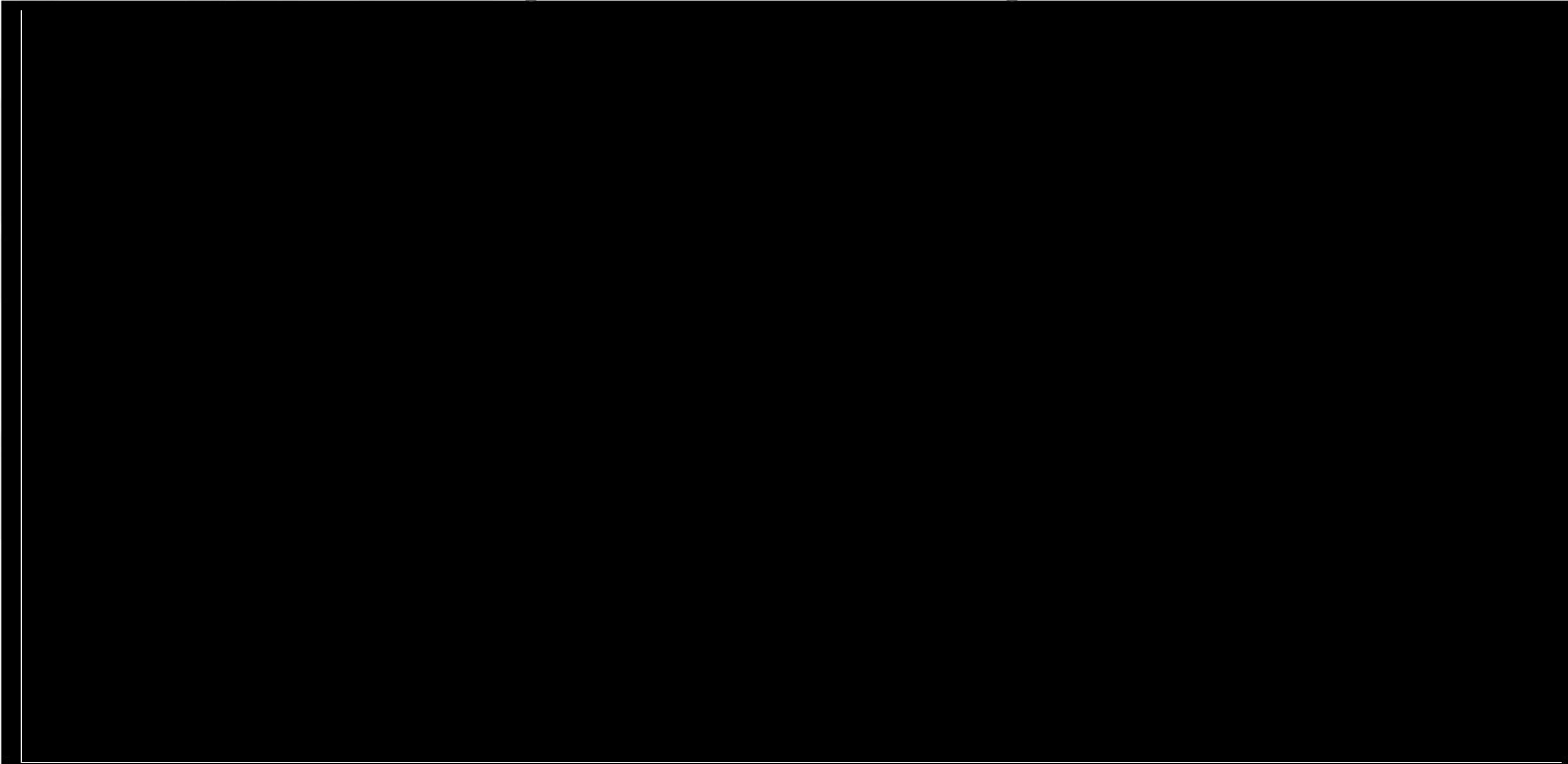


Responsible Gambling Plan

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Converting Customers from Illegal books



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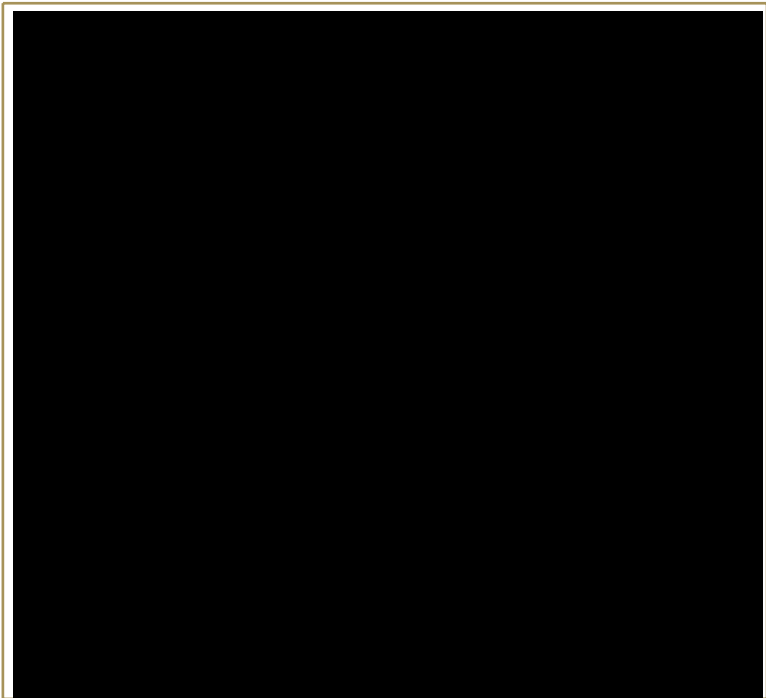
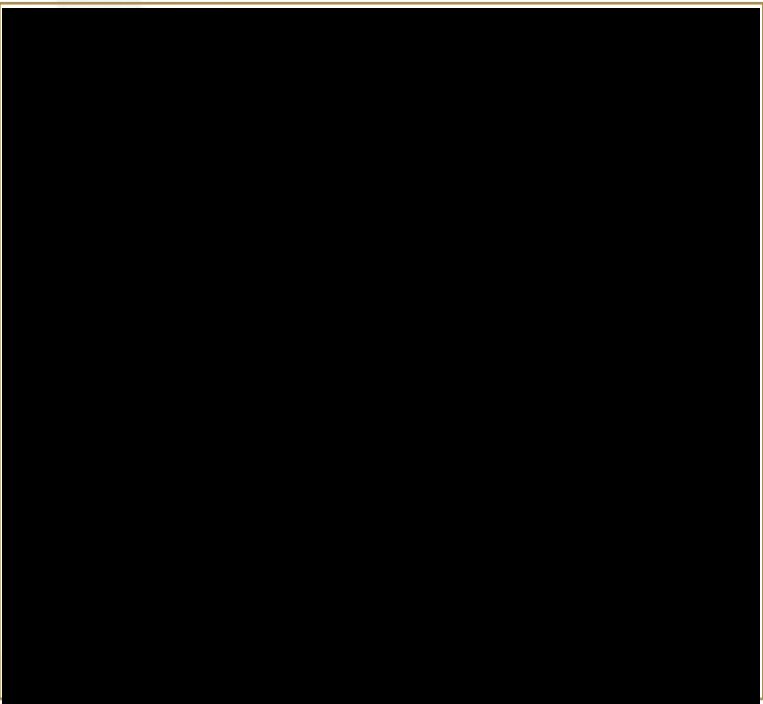
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**Blue Tarp reDevelopment, LLC d/b/a MGM Springfield
Massachusetts Gaming Commission
Application for Category 1 Sports Wagering Operator License
November 2022**

C.3 CONSTRUCTION – GAMING ESTABLISHMENTS (for Category 1 Applicants Only)

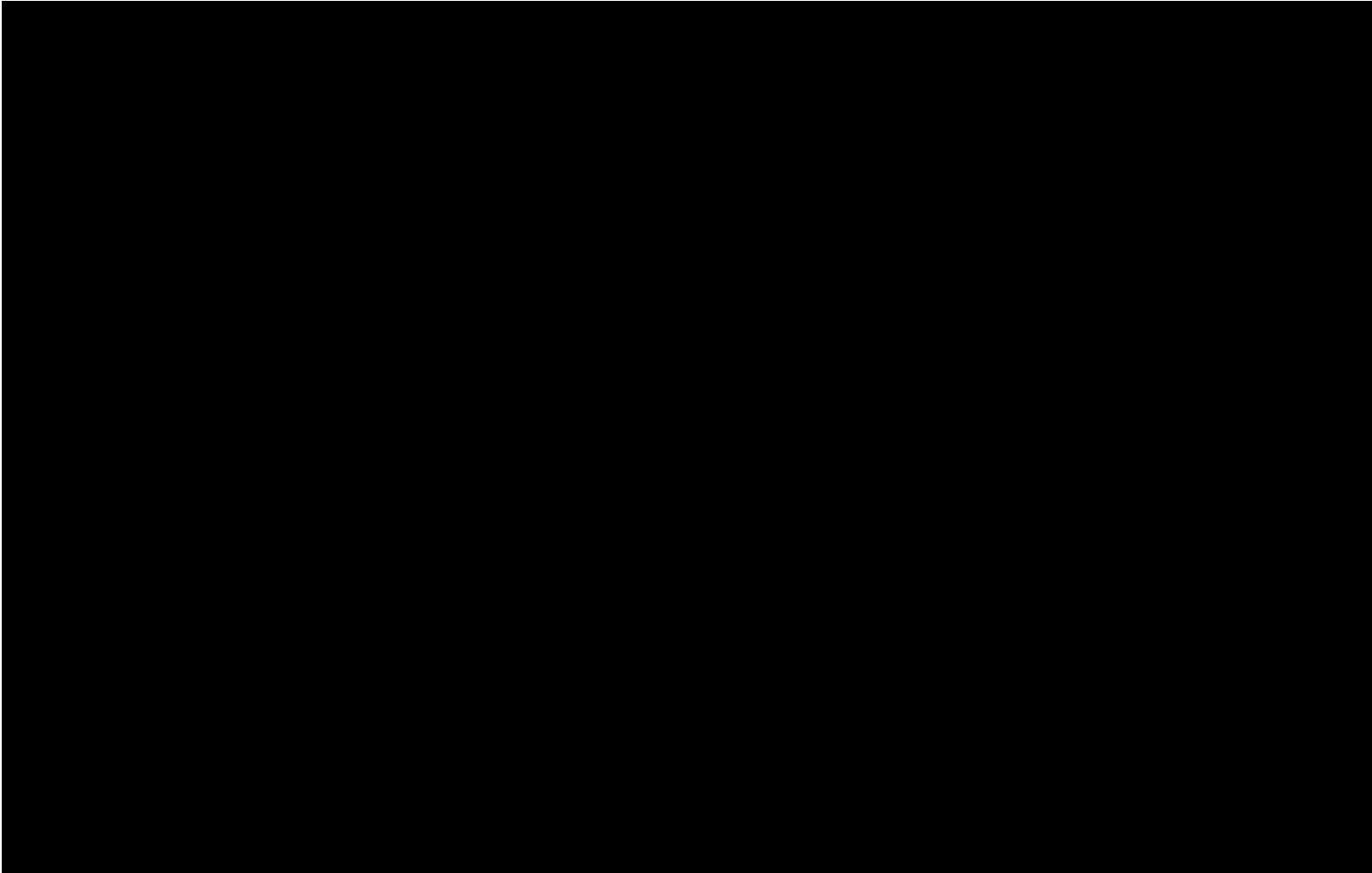
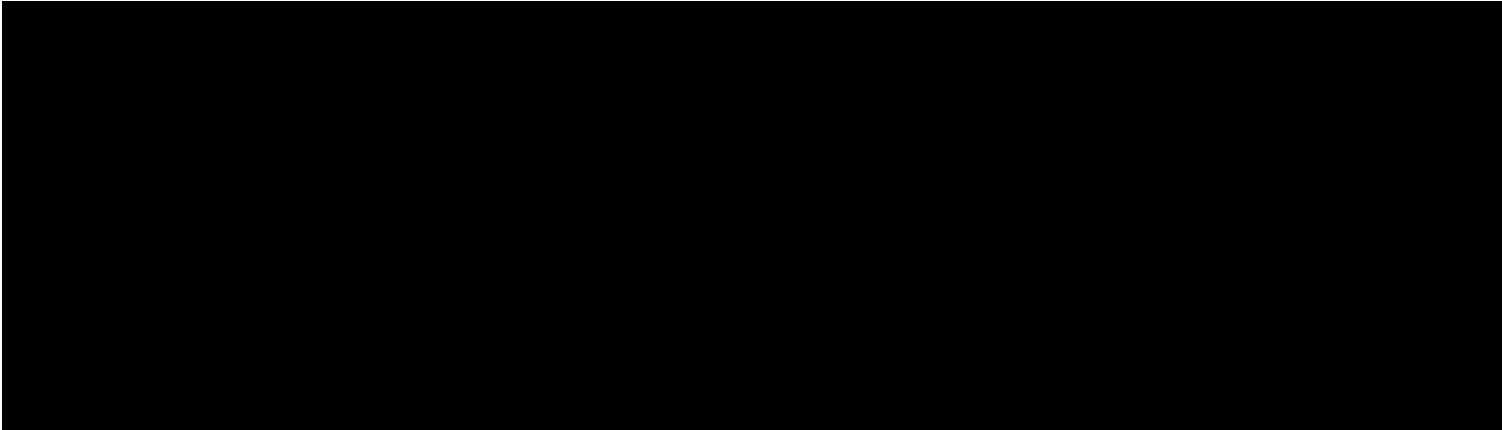
Provide a thorough description of the location of the proposed sports wagering operation. This should include the following:

a. A detailed timeline of construction

Construction of the MGMS sport lounge and betting area started in April 2021 and was completed as of August 2021.



**Blue Tarp reDevelopment, LLC d/b/a MGM Springfield
Massachusetts Gaming Commission
Application for Category 1 Sports Wagering Operator License
November 2022**





**Blue Tarp reDevelopment, LLC d/b/a MGM Springfield
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Application for Category 1 Sports Wagering Operator License
November 2022**

C.3 CONSTRUCTION – GAMING ESTABLISHMENTS (for Category 1 Applicants Only)

Provide a thorough description of the location of the proposed sports wagering operation. This should include the following:

- c. Approximate square footage of the sports wagering area**

The approximate square footage of the sports wagering area is 4,586 square feet.



**Blue Tarp reDevelopment, LLC d/b/a MGM Springfield
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November 2022**

C.3 CONSTRUCTION – GAMING ESTABLISHMENTS (for Category 1 Applicants Only)

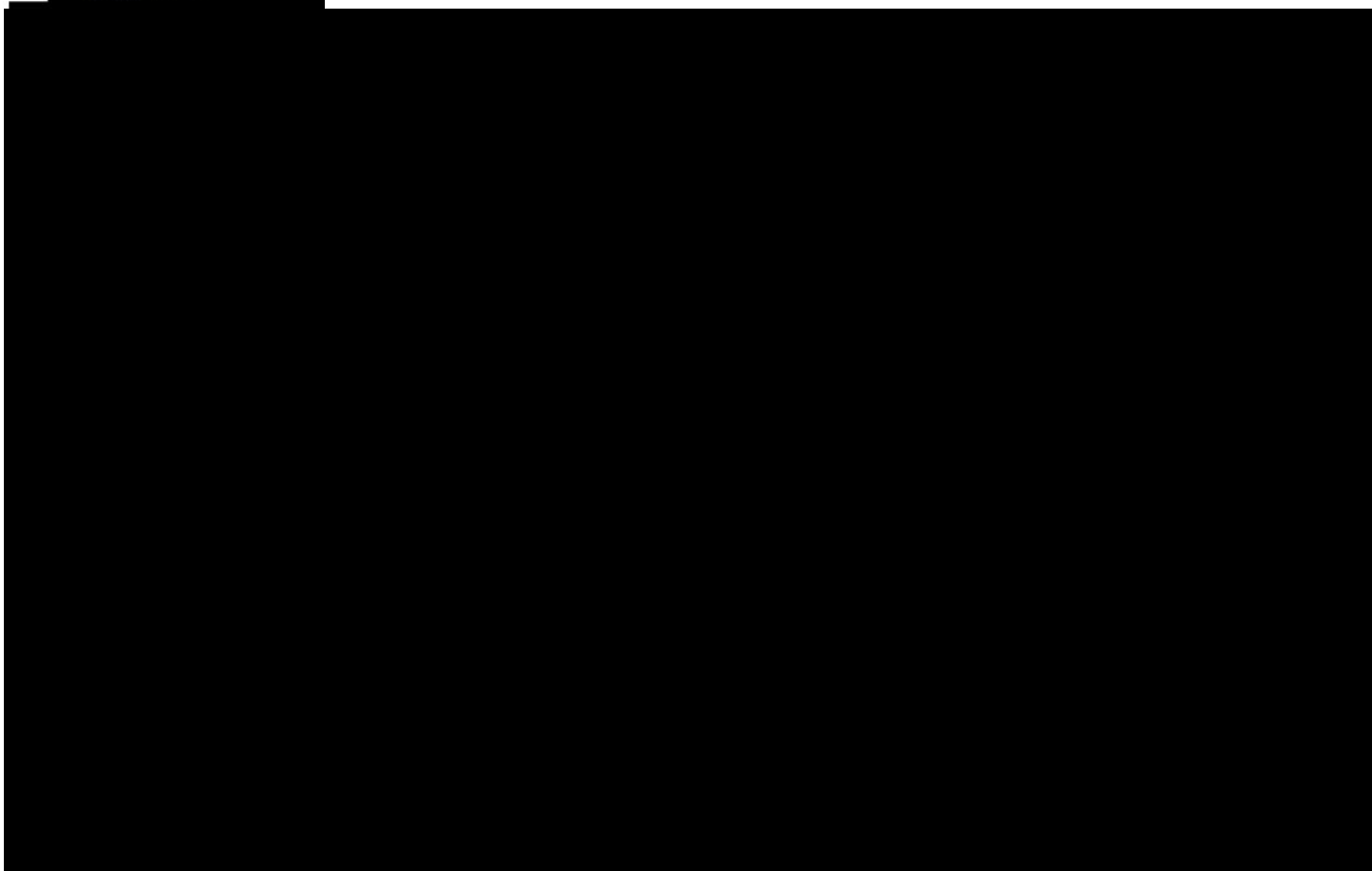
Provide a thorough description of the location of the proposed sports wagering operation. This should include the following:

- d. Secure location for storing funds issued by a cage, to be used in the operation, including all security measures and procedures**

The sports wagering operation will follow the same cash handling and securing procedures as conducted by the cage.

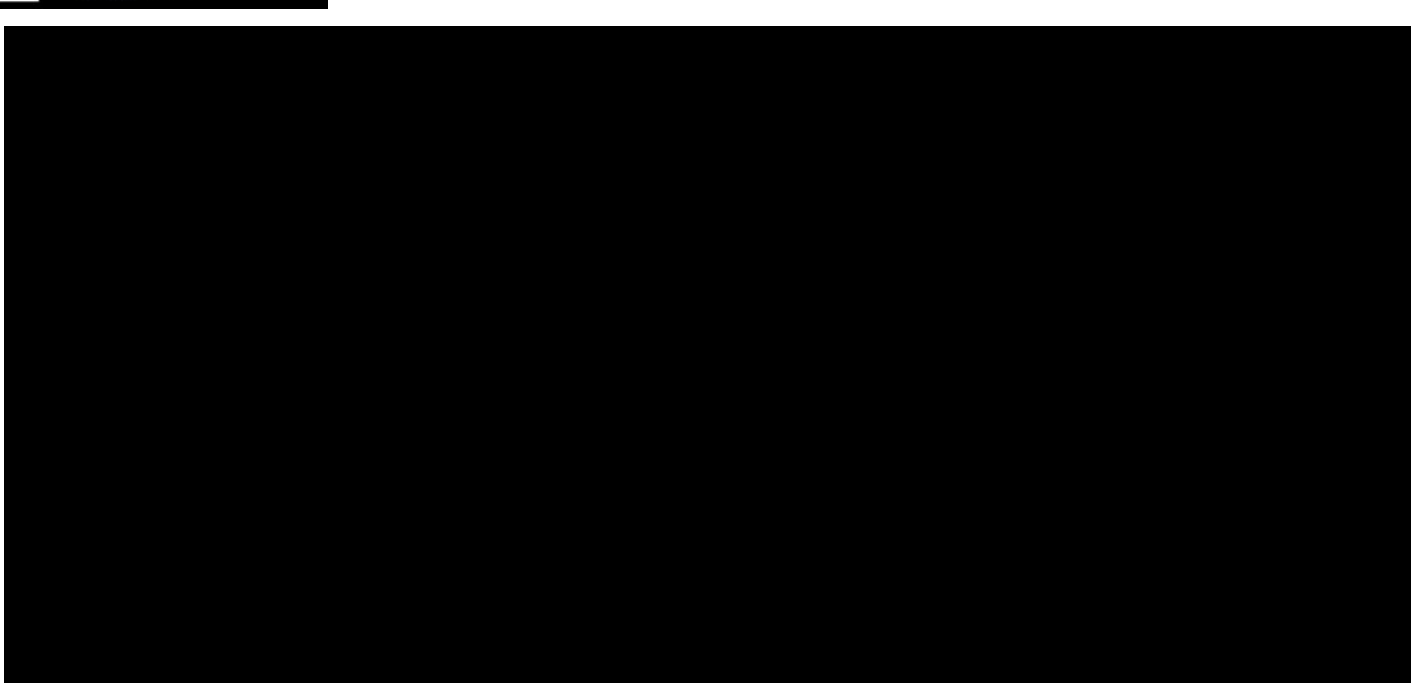


**Blue Tarp reDevelopment, LLC d/b/a MGM Springfield
Massachusetts Gaming Commission
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November 2022**





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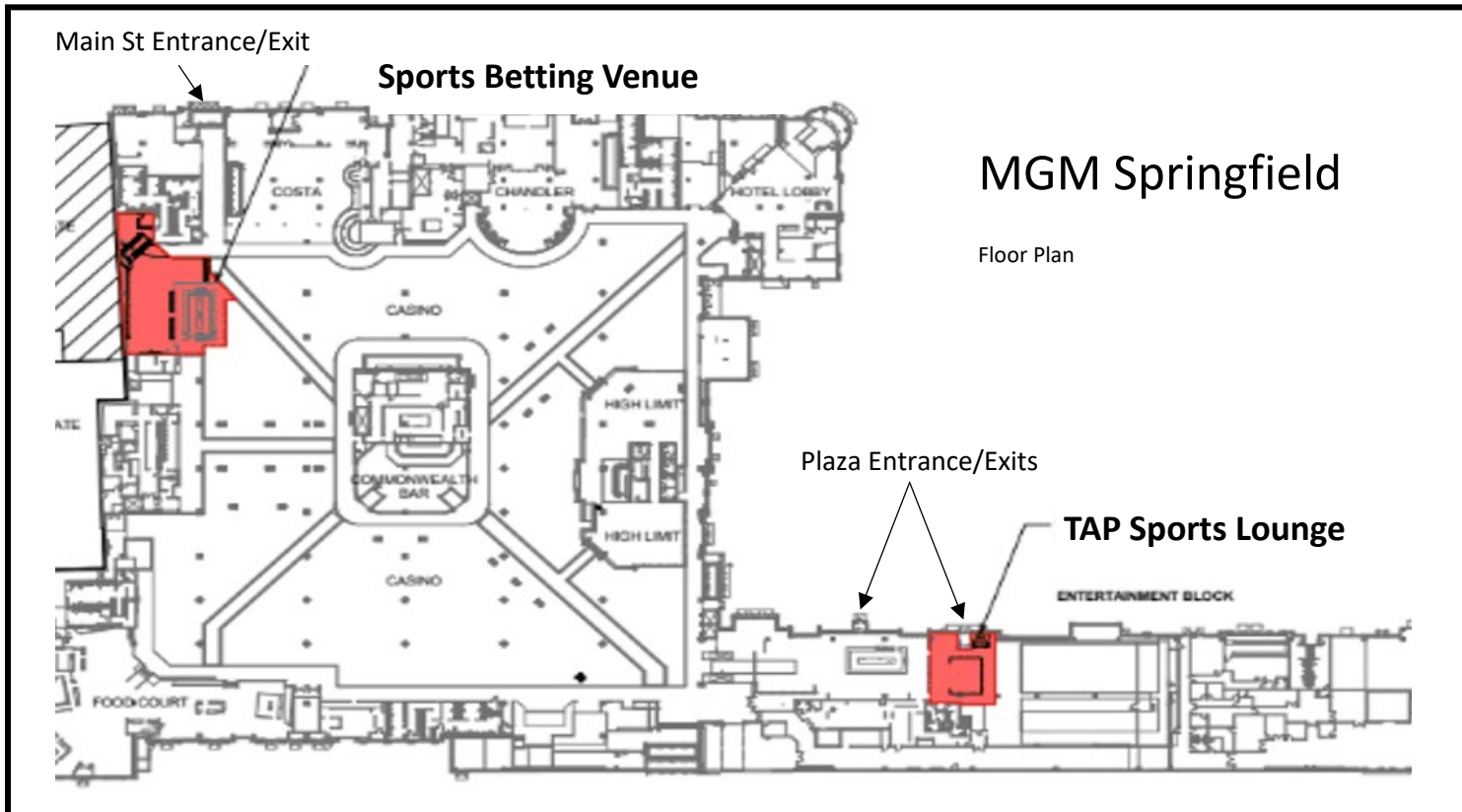
Blue Tarp reDevelopment, LLC d/b/a MGM Springfield
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November 2022

C.3 CONSTRUCTION – GAMING ESTABLISHMENTS (for Category 1 Applicants Only)

Provide a thorough description of the location of the proposed sports wagering operation. This should include the following:

- g. Accessibility of patrons to the proposed sports wagering area, including all means of entry and exit, including handicapped access, and the volume of traffic that can be sustained

The Sports Wagering area can be accessed from anywhere within the Gaming Area. The Sports Wagering area can also be accessed from our Main Street entrance, when open. The area is on the same level grade as the rest of the first floor of the casino, therefore there are no physical barriers, steps or other means preventing ADA access, or similar.





**Blue Tarp reDevelopment, LLC d/b/a MGM Springfield
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C.3 CONSTRUCTION – GAMING ESTABLISHMENTS *(for Category 1 Applicants Only)*

Provide a thorough description of the location of the proposed sports wagering operation. This should include the following:

h. Number and location(s) of ticket window(s)

The Sports Wagering area will include five (5) ticket windows, located on the northeast corner of the Sports Book, one of which will be ADA accessible.



**Blue Tarp reDevelopment, LLC d/b/a MGM Springfield
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November 2022**

C.3 CONSTRUCTION – GAMING ESTABLISHMENTS (for Category 1 Applicants Only)

Provide a thorough description of the location of the proposed sports wagering operation. This should include the following:

i. Number and location(s) of wagering kiosk(s)

MGMS initially proposes installing nine (9) wagering kiosks. Four (4) will be located in the Sports Wagering area, four (4) will be located on the casino floor near the GameSense Info Center, and one (1) kiosk will be located in the High Limit Gaming area.

MGMS is working with BetMGM on securing nine (9) additional wagering kiosks, which will be at to-be-determined locations.



**Blue Tarp reDevelopment, LLC d/b/a MGM Springfield
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 November 2022**

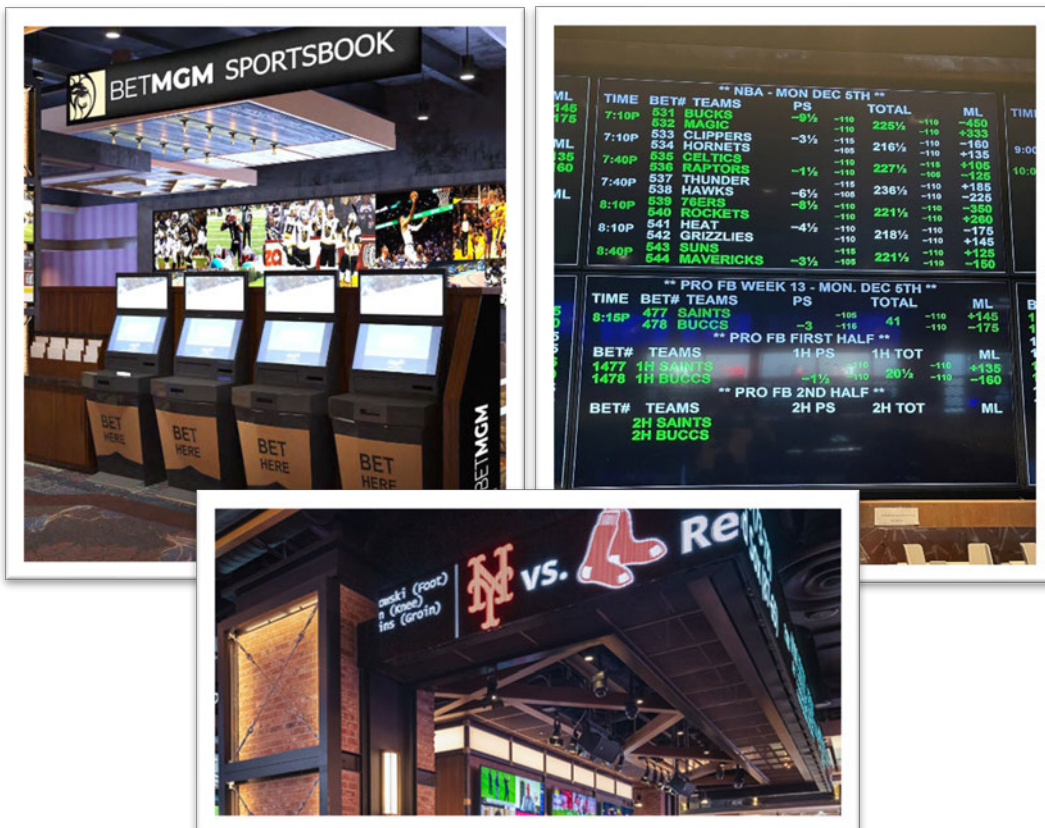
C.3 CONSTRUCTION – GAMING ESTABLISHMENTS (for Category 1 Applicants Only)

Provide a thorough description of the location of the proposed sports wagering operation. This should include the following:

j. Location and display format for all wagers, available to the public

All odds and wagers available will be displayed in several different formats to include, but not limited to;

- digital display screens above the teller’s windows;
- screens at the POS tills at the teller windows;
- wrap around ticker display above Island Bar;
- betting kiosks;
- betting brochures and odds brochures.





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C.3 CONSTRUCTION – GAMING ESTABLISHMENTS *(for Category 1 Applicants Only)*

Provide a thorough description of the location of the proposed sports wagering operation. This should include the following:

k. Location of posting of house rules

The house rules will be posted in the Sports Wagering area near teller windows.



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C.3 CONSTRUCTION – GAMING ESTABLISHMENTS (for Category 1 Applicants Only)

Provide a thorough description of the location of the proposed sports wagering operation. This should include the following:

1. *If applicable* – description regarding any proposal of providing food, beverages, and other concessions to patrons

Although no direct cocktail service or food delivery will be available in the sports wagering area, guests are able to take advantage of several food and beverage outlets immediately adjacent to it. Costa Italian restaurant, the Island Bar and our South End Market are short distances from the sports wagering area, and offer a variety of food and beverage options and styles.





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C.5 COMMUNITY ENGAGEMENT

Provide a thorough description of how the Applicant will contribute to economic & business development, tourism & community relations, and the promotion of charitable causes in the Commonwealth. Including:

- a. Creating partnerships for any community, economic development, and tourism opportunities with local or regional entities including but not limited to the Massachusetts Office of Business Development, Chambers of Commerce, Regional Tourism Councils, and the Massachusetts Marketing Partnership**
- b. Plans, measures, and steps the applicant intends to take to avoid any negative impact on the revenues currently generated by the Massachusetts State Lottery, including cross-marketing strategies and increasing ticket sales**
- c. Promoting local businesses, including restaurants, hotels, and retail outlets**
- d. Cross-marketing with live entertainment venues and/or attractions**
- e. Supporting any community enhancements being incorporated at the local level**
- f. Highlighting unique business and marketing strategies to draw new revenues from new customer**

MGMS has longstanding partnerships with local and regional community groups, tourism, economic development organizations as well as various third party stakeholders. The resort works closely with the Springfield Regional Chamber of Commerce, the Economic Development Council of Western Massachusetts, the Springfield Business Improvement District, the Greater Springfield Convention & Visitors Bureau, and other organizations to regularly collaborate on issues and campaigns including workforce development, community engagement and cross marketing initiatives to collectively drive tourism to downtown Springfield and the region.

MGMS is a member of the Greater Springfield Convention & Visitors Bureau (“GSCVB”) and donates \$150,000 annually toward assisting local small businesses as well as promoting Western Massachusetts as a tourist destination. MGMS also includes several local businesses in our comp program and/or support through our corporate purchasing processes. Examples include Hannoush Jewelers and Walhburgers Restaurant by comping directly to these outlets, as well as allowing guests to redeem their MGM Rewards points at both. We also incorporate a Standard Purchasing Program with local businesses, from our dry cleaner to our niche in-room amenities, to local micro brews that take part in resort VIP events.

MGMS is also proud to partner with many local nonprofit and community groups. We do so not only through financial support, but with volunteer hours. Donations and volunteerism are also supported with earned media initiatives. MGMS is honored to work with local chapters of national organizations including the Boys & Girls Club, The United Way, Habitat for Humanity and Dress for Success. We are also proud to support many local grass roots organizations including the Food Bank of Western Mass, Link to Libraries, Center for Human Development, YWCA, and the Open Pantry Community Services, among others.



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In addition to the wide variety of entertainment venues located on property, the resort is honored to manage two of the largest performance venues in the region, including the MassMutual Center and Springfield Symphony Hall. Our collaboration includes cross marketing initiatives and purchasing ticket blocks for various shows. Our live entertainment partnerships also extend to the newly opened MGM Music Hall at Fenway in Boston, and Gillette Stadium and Fenway Park where MGMS sponsors a suite for every home game as well as providing ticket access to non-sporting events.

With respect to the local lottery, MGMS's expansion into sports wagering in Massachusetts will have the effect of expanding the legal gambling industry within the state rather than cannibalizing the revenues from the Massachusetts State Lottery. By expanding legal gambling offerings within the state, the residents of Massachusetts will no longer be forced to travel to a neighboring state in order to legally gamble. This will keep individuals interested on legally gambling within the state of Massachusetts, and will ultimately have a positive impact on the Massachusetts State Lottery. MGMS also maintains it's ongoing relationship and agreement with the Massachusetts State Lottery, hosting Lottery Kiosks, Lottery Points of Sale, as well as Keno.

As part of the aforementioned relationship with the GSCVB, we also pioneered a new marketing strategy for both MGM Springfield and the entire region titled, "Where Fun Comes to Play." Through this joint initiative we've been able to help showcase all the amenities and tourist attractions the "City of Firsts," has to offer.





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SECTION D: DIVERSITY, EQUITY, & INCLUSION

D.1 DIVERSITY, EQUITY, & INCLUSION – WORKFORCE

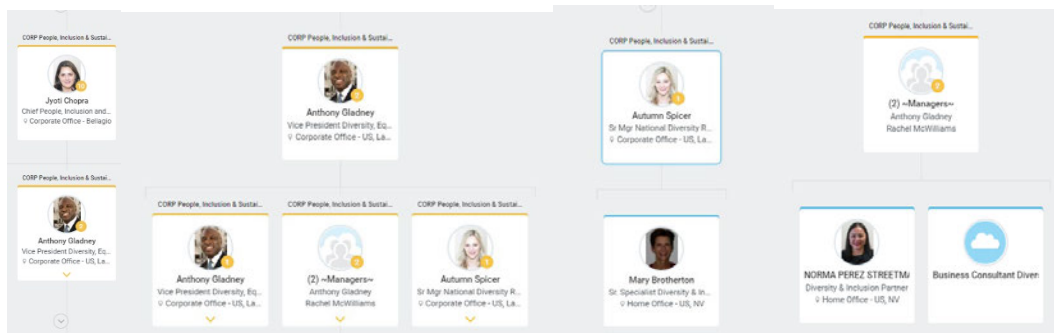
Provide a thorough description of the applicant’s willingness to foster racial, ethnic, and gender diversity, equity, and inclusion, within their workforce, both at the corporate level and the proposed entity within the Commonwealth. The information must include:

- a. Applicant’s current diversity, equity, and inclusion team – *please include the name and title of those individuals currently identified as part of the diversity, equity, and inclusion staff/team, as well as a copy of their location on the applicant’s organizational chart*

Applicant’s current diversity, equity and inclusion team consists of the following individuals:

1. Jyoti Chopra – Chief People, Inclusion, & Sustainability Officer
2. Anthony Gladney – VP of Diversity, Equity, & Inclusion
3. Autumn Spicer – Senior Manager, National Diversity Relations
4. Mary Brotherton – Senior Specialist, DEI
5. Rachel McWilliams – Manager, DEI Programs
6. Norma Perez Streetman – Partner, DEI Programs

Further, please see the below diversity, equity and inclusion team organizational chart.





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D.1 DIVERSITY, EQUITY, & INCLUSION – WORKFORCE

Provide a thorough description of the applicant’s willingness to foster racial, ethnic, and gender diversity, equity, and inclusion, within their workforce, both at the corporate level and the proposed entity within the Commonwealth. The information must include:

b. Applicant’s workforce diversity, equity, and inclusion policy

We are committed to an inclusive and diverse culture for our employees, guests, community partners and stakeholders.

- Talent Management
- Diverse & Inclusive Culture
- Customer, Supply Chain and Stakeholder Engagement

At MGM Resorts, we know the importance of respecting each other’s differences. We endeavor to embrace and leverage those differences to achieve best-in-class experiences and cultivate stronger ties with our employees, guests, suppliers and community partners. We are committed to taking strong and principled stands on issues of equality and aim to better unify our world.

Our commitment to diversity and inclusion is formally implemented through three strategic priorities: People, Culture and Suppliers & Customers. In terms of People, our strategy begins with attracting, developing, and retaining diverse talent and ensuring that talent has equal access to leadership opportunities. We do that by continuously working to embed diversity and inclusion across our HR practices, from onboarding, to mentoring, to succession planning and promotion. We fundamentally believe that harnessing the power of diversity leads to breakthrough thinking and innovation in our company. This belief extends to our supplier and customer base as well.

By embedding diversity and inclusion into our business strategies, we are more directly able to attract diverse segments of society to our resorts and entertainment offerings. And, by actively seeking to buy from and offer mentorship to diverse suppliers, we not only ensure a more resilient supply chain but support the economic development of the very communities in which we operate.



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Diversity, Equity & Inclusion

Fostering Diversity & Inclusion

INVEST IN PEOPLE	INCLUSIVE CULTURE	BUSINESS, CUSTOMER ENGAGEMENT & SUPPLIER DIVERSITY	MARKETPLACE LEADERSHIP & COMMUNITY RELATIONS
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MGM Resorts STRATEGIC GOALS

1 Ensure that all employees – including women, the LGBTQ+ community, people of color and people with disabilities – have access to leadership opportunities throughout MGM Resorts and that our policies of inclusion are embedded into our culture	2 Train 100% of management employees on social impact policies and goals
3 Spend at least 10% of our domestic biddable procurement with diverse suppliers	4 Expand our Supplier Diversity Mentorship Program

Diversity, Equity & Inclusion

Supplier Diversity & Workforce

<p>GOVERNANCE</p> <ul style="list-style-type: none"> Board of Directors Accountability 6 Dedicated DE&I team members Policy driven strategic framework & goals Corporate Social Responsibility Councils 12 Affinity Groups with 20 chapters 	<p>PARTNERSHIP</p> <ul style="list-style-type: none"> Over 120 DEI partnerships locally and nationally Diverse slate of workforce development partners Membership with chambers of commerce & business associations Long standing relationships with educational institutions Strong relationships with trusted non-profit partners
<p>SUPPLIER DIVERSITY</p> <ul style="list-style-type: none"> Clear established goals <ul style="list-style-type: none"> MBE - 10% WBE - 15% VBE - 2% Cultivate connections with diverse bidders leveraging strategic partnerships & supplier mentorship program Attend conferences and townhall meetings to meet diverse suppliers & contractors 	<p>ACCOUNTABILITY</p> <ul style="list-style-type: none"> Workforce reporting Diverse Talent & Recruitment Strategy Annual company wide Internal DE&I Goals Annual company wide leadership DE&I Goals Required DE&I employee training



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D.1 DIVERSITY, EQUITY, & INCLUSION – WORKFORCE

Provide a thorough description of the applicant’s willingness to foster racial, ethnic, and gender diversity, equity, and inclusion, within their workforce, both at the corporate level and the proposed entity within the Commonwealth. The information must include:

c. Workforce demographics, demonstrating the applicant’s current workforce diversity

The current workforce demographics for MGMS, as shared in the Q3 quarterly report, are as follows:

Q3 2022	Goals	Q3 2022 %
Minority	50%	51%
Veteran	2%	5%
Women	50%	40%
<hr/>		
Springfield Residents	35%	39%
Western MA Residents	-	75%
MA Residents	-	77%
<hr/>		
Total # Of Gaming Establishment Employees*	-	
Full Time	-	
Part Time	-	
On Call	-	

2022	Minority		Women		Veterans		Total Headcount	
SUPERVISORS AND ABOVE								
Number of Employees	80	68	75	79	9	10	207	181
% Actual	39%	38%	36%	44%	4%	6%		



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D.1 DIVERSITY, EQUITY, & INCLUSION – WORKFORCE

Provide a thorough description of the applicant’s willingness to foster racial, ethnic, and gender diversity, equity, and inclusion, within their workforce, both at the corporate level and the proposed entity within the Commonwealth. The information must include:

- d. Efforts to be made to cultivate workforce diversity, equity, and inclusion by identifying, recruiting, and hiring minorities, women, persons with disabilities, and veterans**

Since opening, MGMS has partnered with local organizations whose missions focus on upskilling and reskilling with a special emphasis on diverse populations. Our local partners include, Veterans Inc., serving our veteran population for outreach. Job Corps, AARP, Dress for Success, YWCA, Goodwill, Urban League, ROCA and Putnam Vocational High School (the largest diverse high school in the city). The property has received an award from the Massachusetts Rehabilitation Commission (MRC) for its hiring practices for candidates with disabilities.

MGM Resorts International leverages local and national DEI partnerships to help identify, recruit, and hiring minorities in a variety of ways. Through membership, sponsorship, and participation in career fairs and recruiting efforts of a dedicated internal diversity recruiting team. Some examples include National Black MBA Association Conference, Thurgood Marshall, Ascend, Disability:IN Matchmaking, Prospanica, National Urban League Black History Month Career Fair, Hiring Our Heroes, as well as local diverse partner recruitment events.



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D.1 DIVERSITY, EQUITY, & INCLUSION – WORKFORCE

Provide a thorough description of the applicant’s willingness to foster racial, ethnic, and gender diversity, equity, and inclusion, within their workforce, both at the corporate level and the proposed entity within the Commonwealth. The information must include:

- e. Memberships and/or intentions for joining any local, regional, state, and/or national organizations committed to the development and promotion of diversity, equity, and inclusion initiatives**

MGM Resorts International is proud to partner with over 120+ diversity organizations from a local, regional, and national perspective. The areas of focus are – Decent Work & Economic Growth, Gender Equality, Reduced Inequalities, and Quality Education. We leverage our relationships and partnerships to assist our internal partners like Supplier Diversity, Workforce & Talent Acquisition, Construction Development, Global Sales, Sports & Entertainment, and Governmental Affairs.

This following list is intended to reflect a summary and may not include all the groups and organizations we partner with:

- African American – US Black Chamber of Commerce, NAACP, NUL, Thurgood Marshall, National Black MBA Association, Congressional Black Caucus Foundation, National Association of Minority Contractors, 100 Black Men of America
- Hispanic/Latin - UnidosUS, Hispanic Association of Corporate Responsibility (HACR), US Hispanic Chamber of Commerce, Prospanica, League of United Latin American Citizens (LULAC), Hispanic Scholarship Fund, HACU, SER-Jobs,
- Asian American Pacific Islander – OCA National and Local, APIA Scholars, Ascend Leadership Foundation, USPAACC, APAICS, Asian Community Development Center, Japanese American Citizens League, National ACE
- Native American – American Indian College Fund, National Center for American Indian Enterprise Development Council (NCAIED), Reservation Economic Summit (RES), Native American Journalists Association (NAJA)
- Women – Women’s
- Business Enterprise National Council (WBENC), National Association of Women’s Business Owners (NAWBO), National Association of Women in Construction (NAWIC), Women’s Chamber of Commerce of NV, National Coalition of 100 Black Women, Internal Women’s Forum (IWF)
- LGBTQ+ - Human Rights Campaign (HRC), National Gay & Lesbian Chamber of Commerce (NGLCC), Out & Equal, International Gay & Lesbian Travel Association (IGLTA), Association of LGBTQ Journalists (NLGJA)
- Disability/Veterans - Disability:IN, American Council of the Blind, US Vets, USO, Salute to the Troops, Veterans Action Group, National Organization of Disability (NOD)



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D.2 DIVERSITY, EQUITY, & INCLUSION - SUPPLIER SPEND

Provide a thorough description of the Applicant's overall and specific goals, applicable to the total dollar amount of contracts, for the utilization of:

- b. Minority-owned business enterprises**
- c. Women-owned business enterprises**
- d. Veteran-owned business enterprises**

Please include how each of these enterprise groups will participate as:

- Contractors in the design and/or building of the sports wagering platform**
- Vendors in the execution, maintenance, and/or support of the sports wagering platform**
- Vendors in the provision of goods and services**

MGMS, as a Category 1 licensee, will report retail sports operations spend (including diversity spend) as part of the entire operation. The current goals for each diverse category are:

- a. Minority-owned business enterprises - 10%
- b. Women-owned business enterprise - 15%
- c. Veteran-owned business enterprises - 2%

MGMS is committed to prioritizing supplier diversity and growing our diverse supplier chain. MGMS is a member and sponsor of Greater New England Minority Supplier Development Council (GNEMSDC) and the Center for Women & Enterprise (CWE). In connection with our partnerships, MGMS has participated vendor matchmaking events hosted by both GNEMSDC and CWE. These events and partnerships have allowed the property to identify new vendors (i.e., we identified a food product vendor in Eastern Mass, who we will spend with close to \$400,000 annually).

MGMS is also using the Supplier io platform, a database that allows us to identify certified vendors based on the goods and services provided.

Through the efforts of our onsite procurement team, property leadership, and outside advisors (meeting bi-monthly), we have also identified small local vendors that qualify for an MBE certification, and we are currently ushering them through the Commonwealth's certification process with the SDO.



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D.3 DIVERSITY, EQUITY, & INCLUSION – CORPORATE STRUCTURE

Provide a thorough description of the Applicant's commitment to diversity, equity, and inclusion initiatives in the Commonwealth. This should include:

- a. *The makeup of the Applicant's ownership, leadership, and governance structure, – including minorities, women, and veterans in positions of leadership throughout the corporate structure*

Below is a summary of our ownership, leadership, and governance structure.

- 50% gender split in the company
- 73% racially and ethnically diverse talent in the company
- As of December 31, 2021, 46.4% of management employees were racially and ethnically diverse. Please refer to our Social Impact & Sustainability Metrics & Goals (available at: <https://www.mgmresorts.com/content/dam/MGM/corporate/csr/disclosures/2021-report-metrics.pdf>) for further information.

- 11 Directors
 - 2 Diverse
 - 9 non-Diverse
 - 18.2% Racially Diverse Board Members
 - 36.4% Directors are Female
 - 4 Female
 - 7 Male
 - Please refer to our 2022 Proxy Statement filed with the SEC for additional information (available at: <https://d18rn0p25nwr6d.cloudfront.net/CIK-0000789570/061230a0-c0d7-449e-9ca9-38d0ef788923.pdf>).

- Leadership – Executive Management Team
 - Bill Hornbuckle – CEO & President
 - Corey Sanders – COO
 - Jonathan Halkyard – CFO & Treasurer
 - John McManus – Chief Legal & Administrative Officer and Secretary
 - Jyoti Chopra – Chief People, Inclusion & Sustainability Officer
 - Steve Zanella – Chief Commercial Officer
 - Gary Fritz – President of MGM Resorts International Interactive
 - Ayesha Molino – Senior Vice President of Public Affairs



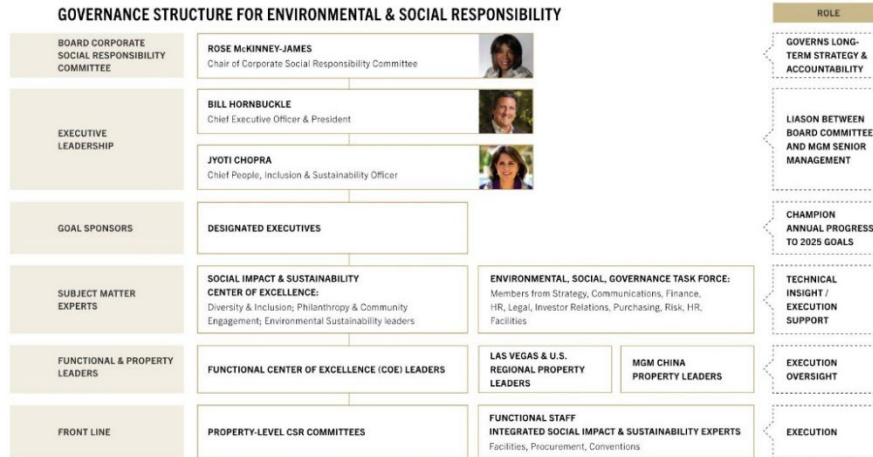
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- Corporate Governance Structure - The Board is responsible for: (i) directing the affairs of the Company in the interests of all the stockholders of the Company, including their interest in optimizing financial returns and the value of the Company over the long term; and (ii) setting expectations about the tone and ethical culture of the Company. The Board, which is elected by the Company's stockholders, is the ultimate decision-making body of the Company, except with respect to matters reserved to the stockholders. The Board considers all major decisions with respect to the Company. However, the Board has established the following committees so that certain important areas can be addressed in more depth than may be possible in a meeting of the full Board and to assist the Board in the performance of its duties: Audit Committee, Compensation Committee, Corporate Social Responsibility Committee, and Nominating/Corporate Governance Committee.
- Please refer to our Corporate Governance Guidelines for additional information (available at: <https://investors.mgmresorts.com/investors/governance/corporate-governance-guidelines/default.aspx>).
- Corporate Social Responsibility Committee – The Corporate Social Responsibility and Sustainability Committee (the “Committee”) is appointed by the Board of Directors (the “Board”) of MGM Resorts International (the “Company”) to assist the Board in (1) reviewing significant policies and performance and providing guidance on matters relating to corporate social responsibility and sustainability; (2) overseeing and monitoring the Company's vision and values related to corporate social responsibility and sustainability; (3) advising the Board and management on significant public issues that are pertinent to the Company and its stakeholders related to corporate social responsibility and sustainability, and (4) assisting management in setting strategy, establishing goals and integrating corporate social responsibility and sustainability into strategic and tactical business activities across the Company to create long-term stockholder value.



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Please refer to our Corporate Social Responsibility Committee Charter for additional information (available at: <https://investors.mgmresorts.com/investors/governance/corporate-social-responsibility-committee-charter/default.aspx>).



Diversity, Equity, & Inclusion (DEI) is a priority focus in our company and the DEI function reports directly to the President & CEO of the corporation. There also exists as a Sub-Committee of the Board of Directors called the Social Impact & Sustainability Committee which has a Chair and has accountability for DEI strategy and goals.

MGM Resorts is integrated into the very fabric of the region and aim to reflect, sustain and build on the best of a community – its businesses, neighborhoods and institutions. Its art, culture and local nuance. We invest heavily in locally and minority-owned businesses and community nonprofits. We work with government, business and civic leaders to earn the licenses we are granted.



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D.3 DIVERSITY, EQUITY, & INCLUSION – CORPORATE STRUCTURE

Provide a thorough description of the Applicant’s commitment to diversity, equity, and inclusion initiatives in the Commonwealth. This should include:

- b. How the Applicant intends to create joint ventures with corporate partners and/or partnerships with local or regional entities, including but not limited to programs, non-profit organizations, and agencies, dedicated to establishing a welcoming and inclusive experience for all patrons, users, and employees in the Commonwealth**

The following is an outline of our external DEI Initiatives:

- i. Partner with national and local partners to provide best practices, education, employee engagement, and events for patrons, users and employees
- ii. We strive to create unified experiences for our guests, and community members with specialized experiences for communities and employees
 - a. DEI Parades – Veterans Day Parades, Pride Parade, MLK Parade locally and regionally
 - b. Celebration of Pride Month Property Wide – External PRIDE messaging, property-wide activations for guests, and activities such as Pride Bar Crawl and recognizing local LGBTQ organizations at Temptation Sundays to provide an inclusive experience to employees, guests, and local community. Also recent membership with the Springfield LGBTQ Chamber of Commerce.
 - c. Awareness Months – Celebrating awareness months with internal communications, spotlighting employees, providing resource guides, and hosting events. We host hybrid awareness month speakers for local and regional employees. Connect DEI partnerships to come and speak. Examples – HACR at Women’s History Month, IGLTA at Pride Month, Employee Panel and Chef Demonstration for Hispanic Heritage Month, etc.

The following is an outline of our internal DEI Initiatives:

- i. **Employee Network Groups** – A decade old program that is MGM’s largest employee program with over 20 chapters and 7,000 members, across our Las Vegas properties, Detroit, Biloxi, Springfield, Northfield Park. The goal of ENGs is to connect employees, expand understanding of backgrounds and perspectives, provide career development opportunities, host volunteer events and encourage employees to take on leadership roles. The mission of the program “You do not need to be one to stand with.”
- ii. **Mentorship Program** – A highly requested program that launched in 2021 with 300 participants and grew to over 1,000 in one year. This program intentionally matches employees across the company based on preferences related to job function, location and career goals. Employees are given virtual resources, learning plans and video sessions to prepare both the mentor and the



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mentee for a successful relationship. Sessions are 6 months long in the formal program and encouraged to continue post program.

- iii. **Learning and Development** – A partnership between L&D and DEI to provide our leaders of people with curriculum around key DEI topics to instill an inclusive culture. Five courses were launched in 2022: Social Impact & Sustainability Introduction, Six Traits of Inclusive Leadership, Unconscious Bias, LGB Understanding and Transgender Awareness, and Anti-Human Trafficking. This partnership is assessed every year to ensure we are focusing on key areas and transformational learnings.
- iv. **Diversity Dashboards** – A program created to streamline our people data to our senior level leaders through technology. Allowing our executives to have access opens their knowledge to gaps in gender and diverse representation and initiates conversations to identify high potential talent in real time.



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SECTION E: RESPONSIBLE GAMING

E.1 RESPONSIBLE GAMING POLICIES

Provide a proposed responsible gaming plan draft that, at a minimum, incorporates policies and tactics for the following key strategies:

- a. Commitment to corporate social responsibility
- b. Support positive play
- c. Promote public health and safety
- d. Ensure responsible advertising and marketing
- e. Manage high-risk financial transactions
- f. Engage the community
- g. Commitment to improvement and reporting

MGMS reaffirms its commitment to Responsible Gaming as an existing Gaming licensee, and now into the new world of Sports Wagering. The attached plan includes all responsible practices currently in place at MGMS for the conduct of gaming, and how they will translate to responsible sports wagering. We also cite new prospective responsible sports wagering regulations, with the ability to adjust as needed with the fluid nature of this new regulatory framework.

Please see MGMS's Responsible Gaming Plan attached.

RESPONSIBLE GAMING INTERNAL

POLICY Pages 1 through 16

REDACTED



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E.2 ADVERTISING & PROMOTIONAL PLANS

Provide a thorough description of the Applicant’s ability to demonstrate the advertising, marketing, and promotional efforts to be made in the Commonwealth. Information should include:

a. Estimated marketing budget in the Commonwealth

Within the \$3M annual budget we dedicate to advertising, we will be adopting Sports Wagering messaging, as an additional integral amenity at our integrated resort. Additionally, please see BetMGM’s “Massachusetts Marketing Plan attached under subsection C.2.f.”

MGMS is excited to have engaged BetMGM as its sports wagering service provider. However, all final decisions regarding marketing efforts regarding retail sports wagering will be in MGMS’s sole and absolute discretion.



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E.2 ADVERTISING & PROMOTIONAL PLANS

Provide a thorough description of the Applicant's ability to demonstrate the advertising, marketing, and promotional efforts to be made in the Commonwealth. Information should include:

- c. *Advertising plans – must include information for any third-party marketing firm applicant plans to partner with for advertising in the Commonwealth*

Within the \$3M annual budget we dedicate to advertising, we will be adopting Sports Wagering messaging, as an additional integral amenity at our integrated resort. Additionally, please see BetMGM's "Massachusetts Marketing Plan attached under subsection C.2.f."

MGMS is excited to have engaged BetMGM as its sports wagering service provider. However, all final decisions regarding marketing efforts regarding retail sports wagering will be in MGMS's sole and absolute discretion.



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E.2 ADVERTISING & PROMOTIONAL PLANS

Provide a thorough description of the Applicant’s ability to demonstrate the advertising, marketing, and promotional efforts to be made in the Commonwealth. Information should include:

- d. Measures to ensure that marketing reaches the target audience and not underage or vulnerable populations**

As noted in our Responsible Gaming Plan submitted in the former section, we only market to those eligible to participate in Gaming and Sports Wagering.



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E.2 ADVERTISING & PROMOTIONAL PLANS

Provide a thorough description of the Applicant’s ability to demonstrate the advertising, marketing, and promotional efforts to be made in the Commonwealth. Information should include:

e. *Player acquisition models – specify minimum age to participate*

MGMS plans to continue incentivizing adopting of our loyalty program through the brick and mortar casino and resort offerings we already provide, and elevate same with Sports Wagering as an additional amenity. Also, as mentioned above the interconnectivity with our partner’s system makes this a great benefit of being a loyalty member with flawless end to end service across all gaming and non-gaming offerings. The minimum age to participate is 21.



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E.2 ADVERTISING & PROMOTIONAL PLANS

Provide a thorough description of the Applicant’s ability to demonstrate the advertising, marketing, and promotional efforts to be made in the Commonwealth. Information should include:

f. Plans to incorporate responsible gaming and problem gambling information

As with current messaging, and previously mentioned within our Responsible Gaming Plan, any gaming and/or sports wagering related collateral will include problem gambling assistance and age-related restriction verbiage.



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E.2 ADVERTISING & PROMOTIONAL PLANS

Provide a thorough description of the Applicant’s ability to demonstrate the advertising, marketing, and promotional efforts to be made in the Commonwealth. Information should include:

- g. Strategies for converting those customers wagering via unlicensed or illegal means to wagering legally in the Commonwealth**

MGMS will work with our service provider BetMGM on strategies for converting customers from unlicensed or illegal wagering options. Please see below page from BetMGM’s “Massachusetts Marketing Plan” showing our direction in this initiative.

Converting Customers from Illegal books CONFIDENTIAL AND NOT SUBJECT TO DISCLOSURE AS A PUBLIC RECORD PURSUANT TO M.G.L. c. 23N, § 6(i)

As an operator fully committed to strictly legal sportsbook activity, we have a vested interest in ensuring consumers are made aware of the risks and illegalities of wagering with unlicensed and or grey market entities. Our consumer obligation manifests in multiples strategies listed below in point form for concision.

- Use of paid search to bid against terms associated with said entities and focused on messaging that highlights the legal status of BetMGM versus the terms being served against.
- Social media messaging and targeting users following the pages etc. of said entities aimed at ensuring they as consumers are aware that legal and responsible options are available via operators such as BetMGM.
- SEO content aimed at providing informational resource to consumers ensuring they are aware that legal and responsible options are available via operators such as BetMGM and that the use of unlicensed and or illegal entities is a federal offence.



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E.2 ADVERTISING & PROMOTIONAL PLANS

Provide a thorough description of the Applicant’s ability to demonstrate the advertising, marketing, and promotional efforts to be made in the Commonwealth. Information should include:

- h. Examples of marketing, advertising, and promotional materials/activities recently used in other jurisdictions**

Through both our sister properties in other jurisdictions and our service provider BetMGM, we provide the following example of a successful marketing and promotional programs in other states:

Sports Book Promotional Offerings

Guests may participate in these three anniversary weekend events in the Sportsbook:

12/9/2022 6pm – 9pm

Prize wheel – Show bet slip from that day and get a free spin on the prize wheel.

12/10/2022 12pm – 4pm

Cheer/Mascot Appearances photos.

Prize Wheel – Show a betting slip from that day and get a free spin on the prize wheel.

Raffle ticket random drawing giveaways – guest receives raffle ticket as they take their seat/table. Winners called each quarter.

12/11/2022 12pm – 4pm

Alumni Appearances photos; Rally towels on chairs; Raffle ticket random drawing giveaways – guest receives raffle ticket as they take their seat/table. Winners called periodically by casino staff.

Prizes

Prizes may vary but include items like: Koozies; T-Shirts; Motorized hand fans; Ravens/Commanders Hats; Mini Helmets; Water bottles; Stress balls; Bottle openers; Pair of tickets to Ravens/Commanders game.



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E.3 HISTORY OF DEMONSTRATED COMMITMENT

Provide a thorough description of the policies and procedures that the applicant has adopted to:

- a. Promote responsible gaming within the gaming establishment or mobile application and in the community**
- b. Assist patrons and users that are experiencing gambling-related harm**
- c. Cooperate and support any government or regulatory agencies to promote responsible gaming and/or mitigate gambling-related harm**
- d. List any membership or partnership with an agency or organization whose mission is in whole, or part, dedicated to responsible gaming or problem gambling**
- e. List any awards or recognition the applicant has received, related to efforts to promote responsible gaming, or mitigating gambling-related harms**
- f. List any fines, violations, citations, and/or corrective action required by the applicant in response to insufficient or improper policies, procedures, operations, advertising/marketing, and/or any other business related to sports wagering or other gambling enterprises**

As stated in MGMS's Responsible Gaming Plan, we promote responsible gaming through many methods. This includes, but is not limited to, full adoption of the GameSense program by MGMRI properties nationwide, and participating in annual RG events like RGEM and PGAM. We assist patrons onsite by referring them to the GameSense advisors, as well as provide problem gambling helpline information. In partnership with the Commission, MACGH and the AGA, we promote responsible gaming all year round through on-site, external and social media messaging methods. In 2019, MGMRI received the NCPG's Public Awareness Award as a recognition of our dedication to responsible gaming. MGMS has received fines levied by the Commission for non-compliance with protecting minors and underage youth from gaming. However, in all these cases, we have continued to update strategies, train staff and even make physical changes to the gaming area to reduce and prevent these instances. More details to the penalties issued are located in G.4



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SECTION F: TECHNOLOGY

F.1 GEOFENCING

Provide a thorough description of how the applicant will ensure that authorized users placing online sports wagers on their platform are geographically located in the Commonwealth of Massachusetts. This information must include:

- a. Which geolocation system(s) will be utilized to reasonably detect the physical location of an authorized user attempting to place a wager on the platform?**
- b. How the system will:**
 - 1. Accurately detect the physical location of an authorized user attempting to access or place a wager on the platform through accurate location data sources (Wi-Fi, GSM, GPS)**
 - 2. Block or deny unauthorized attempts to access the platform, or place a wager, from outside of the Commonwealth**
 - 3. Update the IP address and physical location if they change while the user is active on the platform**
 - 4. Identify attempts to circumvent the requirement to be physically located in the Commonwealth**
- c. How the applicant will log information received from the system**
- d. How the applicant will report the information received from the system to the Commission**

Not applicable. As a retail entity offering in-person wagering options, geofencing is not an applicable technology.



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F.2 **KNOW YOUR CUSTOMER**

Provide a thorough description of how the Applicant will ensure the verification of information provided by users opening a new account on the platform.

1. Ensure the integrity of the user's account information
2. Ensure the integrity of a user's device if it indicates tampering or suspicious activity
3. Notify the applicant of potential risks or fraudulent activity

[Redacted]

[Redacted]

■ [Redacted]

■ [Redacted]

■ [Redacted]

■ [Redacted]

■ [Redacted]



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F.3 TECHNOLOGICAL EXPERTISE AND RELIABILITY

Provide a thorough description of how the Applicant will ensure the security, sustainability, and reliability of the following items:

a. Wager acceptance

Before accepting wagers on any event category or internet sports betting wagers of a particular wager type, MGMS, will receive event category or wager type approval from the Commission. Unless already approved by the Commission, a request for approval is submitted by MGMS, in the form and manner prescribed by the Commission. A request for approval of an event category involving athletic events typically include, at a minimum, the name of the sports governing body and, to the extent known by MGMS, a description of its policies and procedures regarding event integrity. A request for approval of an event category involving events other than athletic events typically include:

- A full description of the event category and the manner in which internet sports betting wagers would be placed and winning sports betting wagers would be determined.
- A full description of any technology which would be utilized to offer the event category.
- Any rules or voting procedures related to the event category.
- Any other information the regulator considers necessary.

Only approved leagues, events and wager types which are approved by the regulator will be offered on our site to authorized participants. MGMS only accepts sports wagers on events and wager types for which:

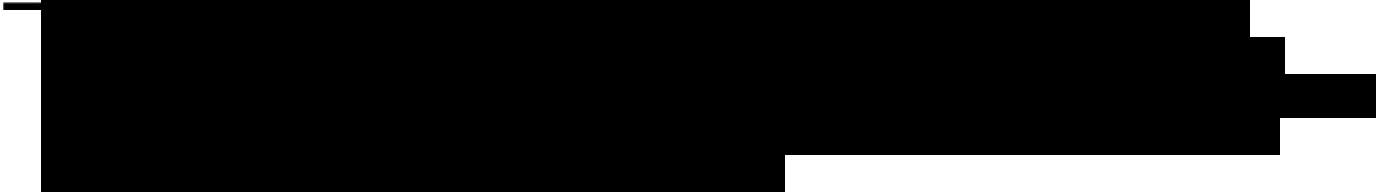
- The event can be effectively supervised by a sports governing body or other oversight body.
- There are integrity safeguards in place.
- The outcome can be documented and verified.
- The outcome can be generated by a reliable and independent process;
- The outcome is not affected by any wager placed; and
- The event and acceptance of the wager is conducted in conformity with all applicable laws.

If it is determined that MGMS has offered an unauthorized or prohibited event category, event, or wager type, MGMS will immediately cancel and refund all internet sports betting wagers associated with the unauthorized or prohibited event category, event, or wager type. MGMS will notify the Commission after cancelling and refunding the internet sports betting wagers. MGMS will not knowingly accept an internet sports betting wager on an event or wager type whose outcome has already been determined and is publicly known.





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Provide a thorough description of how the Applicant will ensure the security, sustainability, and reliability of the following items:

b. Systems for monitoring structured wagers, real-time data feed, and any unusual or suspicious wagering activity

The BetMGM retail wagering systems, that MGMS will use, have established triggers that alert the Trading department to further evaluate any transaction and review all of the suspicious behavior. MGMS and BetMGM will work closely to promptly report to the regulator upon detecting or becoming aware of any of the following:

- Any person participating in retail wagering who is engaging in or attempting to engage in, or who is reasonably suspected of, cheating, theft, embezzlement, collusion, use of funds derived from illegal activity, money laundering, or any other illegal activities.
- Any person who is reasonably suspected of misrepresenting their identity or using false identification to place wagers or cash out winning tickets.
- Suspected criminal activity related to any aspect of retail wagering.
- Any retail wagers that violate any applicable state or federal law.

MGMS and BetMGM utilize US Integrity for integrity monitoring services. This organization is designed to detect and discourage fraud and other illegal or unethical activity related to betting on sporting events in the United States. US integrity works in partnership with its member gaming operators; federal, state and tribal regulators and law enforcement; and other various stakeholders involved in sports betting in the United States. MGMS and BetMGM also utilize US Integrity to share information on suspicious activity regarding sports wagering in a timely manner with other certificate holders or operators and the regulator. US Integrity will share the information MGMS and BetMGM reports with the applicable sports governing bodies/leagues should an escalation be required. MGMS and BetMGM will review information and reports from other certificate holders or operators and notifies other certificate holders or operators of any similar activity through US Integrity.

MGMS and BetMGM may upon receiving a report of suspicious wagering activity suspend wagering on events related to the report but will only cancel related wagers after receiving approval from the regulator. MGMS and BetMGM will make available to the regulator any hardware or software necessary to the regulator for evaluation of BetMGM's retail wagering offering or to conduct further monitoring of data provided by BetMGM's system. BetMGM maintains the confidentiality of information provided by a sports governing body to BetMGM related to unusual wagering activity,



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suspicious wagering activity, or the integrity of an event, unless disclosure is required by the regulator, any applicable law, or a lawful order of a court of competent jurisdiction.

BetMGM maintains records of all integrity monitoring services and activities, including all reports of unusual or suspicious wagering activity and any supporting documentation, for a minimum of 5 years and must provide such records to the Commission on request. MGMS and BetMGM will notify the regulator of any suspicious retail wagering activity or patterns that indicate a concern regarding the integrity of retail wagering or any other conduct that corrupts the outcome of retail wager.



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Provide a thorough description of how the Applicant will ensure the security, sustainability, and reliability of the following items:

c. Description, location, and periodic testing of servers

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]



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[Redacted]

[Redacted]

[Redacted]



BETMGM

Information Security Standards

Version: 1.1

Classification: INTERNAL

1 Version control record

Name of document	Information Security Standards
Owner	Information Security Officer

2 Revision and Review History

Date	Ver	Author	Description
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	

3 Confidentiality statement

All information contained in this document is **INTERNAL**. No copies or distribution permitted without the consent of the document owner.

**[Remainder of document redacted in accordance with
M.G.L. ch. 23N, § 6(i) as trade secret, competitively-
sensitive or other proprietary information]**



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Provide a thorough description of how the Applicant will ensure the security, sustainability, and reliability of the following items:

e. Security of patron personal and wagering information

All sensitive information is stored in encrypted format in the database, and data sent over the network is encrypted using SSL. Only the required ports are enabled to communicate between internal and external service access. A dedicated security team of experts work 24/7 to monitor, analyze, and protect our production environment. BetMGM's system was able to withstand many previous attacks such as WannaCry, Apache heart bleed, etc. as well as DDoS attacks through Neustar.



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Provide a thorough description of how the Applicant will ensure the security, sustainability, and reliability of the following items:

- f. Integrity monitoring and reporting, including any current affiliations related to integrity monitoring**

Please refer back to our answer for subsection F.3.b, as it also covers our integrity monitoring processes and standards through our vendor, US Integrity.



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SECTION G: SUITABILITY

G.1 SUITABILITY – CORPORATE INTEGRITY

Applicants must also complete and submit the following documents, before any suitability investigations or background checks will commence:

- [Massachusetts Gaming Commission Business Entity Disclosure Form](#)
- a. **Joint Venture Agreements for the implementation of a sports wagering operation:**
 1. **Other Applicants**
 2. **Businesses**
 3. **Contractors**
 4. **Vendors**

Please refer to the Business Entity Disclosure Form and related documents for MGMS on file with the Commission.



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G.2 SUITABILITY - INDIVIDUAL QUALIFIER INTEGRITY

Any Key Persons or Employees associated with an applicant must also complete and submit the following documents, before any suitability investigations or background checks will commence:

- [Massachusetts Gaming Commission Multi-Jurisdictional Personal History Disclosure Form](#)
- [Massachusetts Gaming Commission Supplemental Form](#)

Please refer to the Multi-Jurisdictional Personal History Disclosure Forms and Massachusetts Gaming Commission Supplemental Forms on file with the Commission for Key Persons and Employees associated with MGMS.



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G.3 FINANCIAL STABILITY & INTEGRITY

Please provide the following documents, for the last five (5) fiscal years and through the date of the application:

- b. Documentation demonstrating the financing structure and plan for the proposal, including all sources of capital. *Please include current capital commitments, as well as plan and timing for meeting future capital needs***

MGMS, as a Category 1 licensee, submits an Independent Audit Report and Material Weakness Statement subject to regulation 139.07(1). On a quarterly basis, MGMS also submits spending reports.

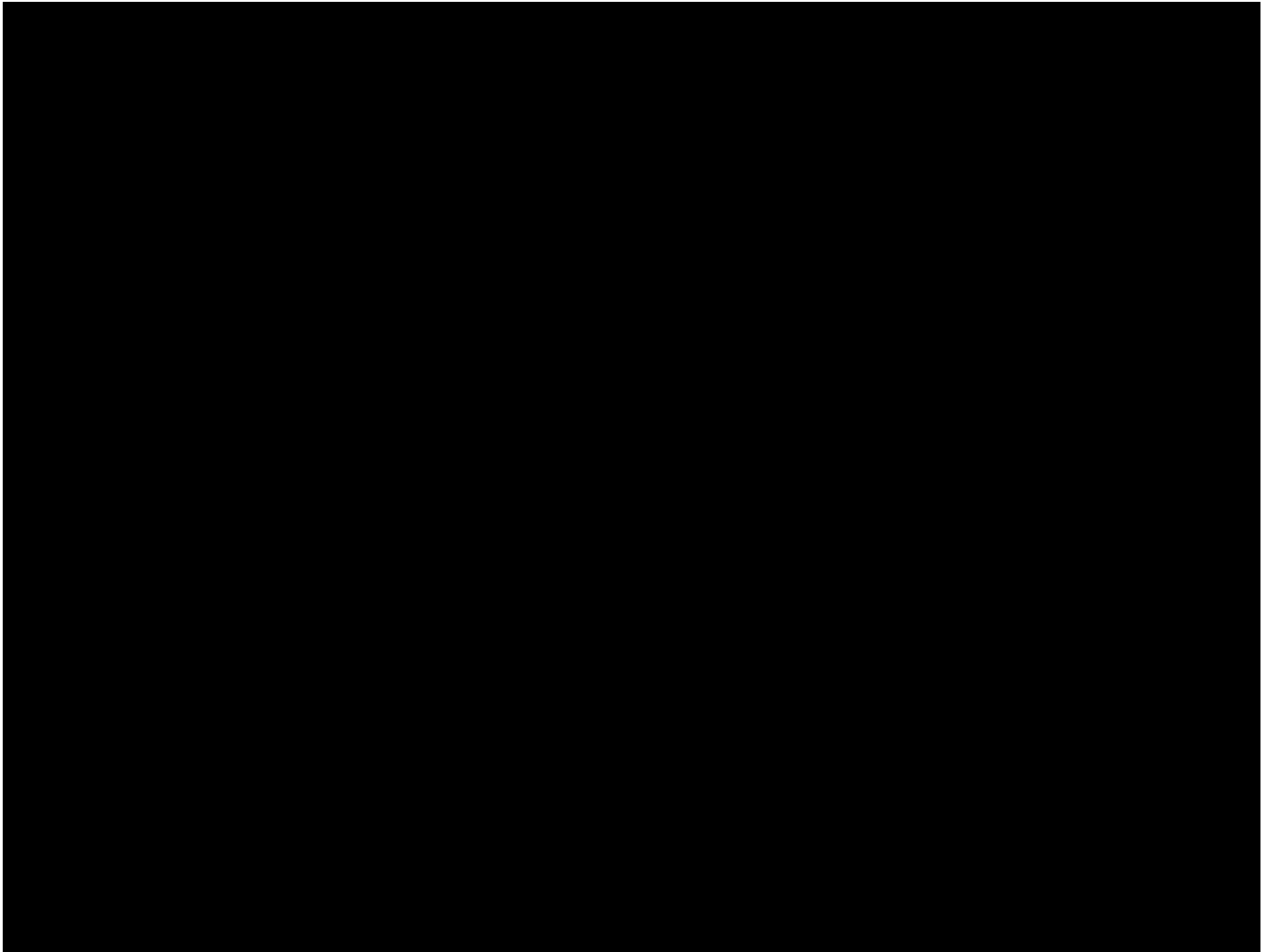


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G.3 FINANCIAL STABILITY & INTEGRITY

Please provide the following documents, for the last five (5) fiscal years and through the date of the application:

- c. A detailed budget of the proposal cost, including any construction, design, legal and professional, consulting, and all other developmental fees. *Also identify all other pre-launch costs, including training, marketing, and initial startup capital***





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G.3 FINANCIAL STABILITY & INTEGRITY

Please provide the following documents, for the last five (5) fiscal years and through the date of the application:

- d. An analysis, including best, worst, and average case scenarios, that demonstrates the applicant's plan and capacity for accommodating steep downturns in revenues, and provides examples of those plans and strategies that have been successful in other jurisdictions**

MGMS looks upon sports wagering as a potential integral part of our revenue generation portfolio and by adding it as an additional amenity, will be able to drive revenue growth across the property. However, as we operate as an integrated resort, with a number of other gaming and non-gaming revenue streams, in the event of any seasonality or downturn in sports wagering revenue, we believe our existing product is robust enough to supplement and bolster any such downturn.



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G.3 FINANCIAL STABILITY & INTEGRITY

Please provide the following documents, for the last five (5) fiscal years and through the date of the application:

- e. What are the Applicant's annual liquidity, leverage, and profitability ratios, including current ratio, debt-to- equity ratio, and gross/net margin ratios?**

As a wholly owned subsidiary of our parent company MGMRI, MGMS is financially backed and supported by their strong balance sheet and the following recent data points:

- Third Quarter 2022 Net Revenues and Liquidity
 - Consolidated net revenues of \$3.4 billion compared to \$2.7 billion in the prior year quarter, an increase of 26%.
 - Las Vegas Properties
 - Regional Properties
 - Macau SAR, China
 - Cash and cash equivalents as of September 30, 2022: \$5.295B



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G.3 FINANCIAL STABILITY & INTEGRITY

Please provide the following documents, for the last five (5) fiscal years and through the date of the application:

- f. Information pertaining to contracts, loan agreements, and/or commitments that the applicant has breached or defaulted on during the last ten years. *Provide information for any lawsuit, administrative proceeding, or another proceeding that occurred as a result of the breach or default***

MGMS does not have lawsuits, administrative proceedings or other proceedings that occurred as a result of any breach of contract, loan agreement, or commitment.



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G.3 FINANCIAL STABILITY & INTEGRITY

Please provide the following documents, for the last five (5) fiscal years and through the date of the application:

- g. A description of any administrative or judicial proceeding, during the last ten years, in which the applicant or any entity that owns 5%, or greater share, was found to have violated a statute or regulation governing its operation**

With respect to MGMS, the following fines were paid by the Company as a result of alleged Gaming Act violations. In both instances, the Company cooperated with the IEB Investigation and agreed to the proposed fine.

- May 21, 2019, \$100,000 For Alleged Under Age Gaming and Alcohol Violations
- March 17, 2021, \$18,000 For Alleged Under Age Gaming and Alcohol Violations

In the ordinary course of business, MGMS is regularly named as a party to various employment-related administrative charges. Accordingly, in responding to this question, we have not included employment related, single party administrative agency decisions or findings (e.g. NLRB, EEOC, OSHA and their state equivalent agencies) in which MGMS has been named.

With respect to MGMRI, please note that we do not generally track regulatory warning letters or violations that did not result in a fine, nor violations that were the result of a routine gaming regulatory authority audit. Additionally, in the ordinary course of business, MGMRI is regularly named as a party to various employment-related administrative charges, often times improperly as the parent of its various subsidiaries. Accordingly, in responding to this question, we have not included employment related, single party administrative agency decisions or findings (e.g. NLRB, EEOC, OSHA and their state equivalent agencies) in which MGMRI has been named.

With the foregoing limitations, please note the following:



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- On June 7, 2017, the Clark County (Nevada) Department of Air Quality (“CCAQ”) issued an Notice of Violation (#8954) alleging potential violations of the Clark County Air Quality Regulations and permit conditions and with a proposed fine of approximately \$214,900. MGMRI ultimately entered into a settlement agreement for a reduced fine of \$150,000.
- On May 6, 2020, the Pennsylvania Gaming Control Board (“PGCB”) issued a complaint (115299- E5967-20) alleging a potential violation by MGMRI of PGCB’s post-employment restrictions related to the hiring of former employee of the PGCB by an MGMRI subsidiary with job duties wholly unrelated to BetMGM, LLC’s proposed Pennsylvania online business. On or about July 14, 2020, MGMRI paid a fine of \$85,000, plus administrative costs of \$2,500, to settle the matter.

Notwithstanding the limitations above, we do not believe that we have knowingly omitted any material matter or one for which a gaming regulator would otherwise likely have an interest.

Additionally, given that the foregoing question is expressly limited to MGMS’s 5% and greater owners, we have not included the gaming regulatory violations history of MGMRI’s operating subsidiaries (because such subsidiaries do not have an ownership interest in MGMS, LLC). Such violation history is available to the Commission upon request and is updated the violation history every quarter in the Compliance Committee compliance binders.



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G.3 FINANCIAL STABILITY & INTEGRITY

Please provide the following documents, for the last five (5) fiscal years and through the date of the application:

- (h) Any bankruptcy filings made, or proceedings commenced, for any entities owned or controlled by the applicant and any entity owning a 5% or greater share of the applicant**

With respect to MGMS, such entity has not had any bankruptcy filings made, or proceedings commenced.

With respect to MGMRI, please note that MGMRI had a 50% interest in Silver Legacy Capital Corporation through one of its subsidiaries, Galleon, Inc., while the other 50% was owned by Eldorado LLC. Silver Legacy is located in Reno, Nevada, adjacent to the Circus Circus Reno. Silver Legacy had about \$143 million of outstanding secured notes that were due in March 2012. Silver Legacy did not repay its notes at maturity and filed for Chapter 11 bankruptcy protection in May 2012 before the U.S. Bankruptcy Court, State of Nevada, Reno Division (Docket No. 12-51156-BTB). These notes were non-recourse to MGMRI.

In October 2012, Silver Legacy announced that the presiding court had confirmed Silver Legacy's proposed consensual plan of reorganization and approved the settlement agreement among Silver Legacy, the two largest holders of the notes and the indentured trustee. The plan of reorganization provided that the holders of the secured notes would receive a combination of cash and new second lien notes and that the unsecured creditors would be paid in full. The court also approved for Silver Legacy to enter into an agreement with Wells Fargo and certain of its affiliates for a new \$70 million senior secured credit facility that provided a portion of the exit financing associated with the plan of reorganization. In July 2015, MGMRI entered into an agreement to sell its 50% interest in Silver Legacy to Eldorado LLC for approximately \$53 million. The sale was completed on November 24, 2015.

Please also note MGMRI holds an indirect 50% membership interest in each of Turnberry/MGM Grand Towers, LLC, Turnberry/MGM Grand Tower B, LLC and Turnberry/MGM Grand Tower C, LLC (collectively, the "Tower Entities") through one of its subsidiaries, MGM Grand Hotel, LLC, which itself is the sole member of MGM Grand Condominiums, LLC, MGM Grand Condominiums II, LLC, and MGM Grand Condominium III, LLC (the "Non-Managing Members"). Each Non-Managing Member holds a 50% non-managing membership interest in one of the Tower Entities. On information and belief, the other 50% membership interests in each of the Tower Entities is held by Turnberry Harmon Ave., LLC, Turnberry Harmon Ave. Tower B, LLC and Turnberry Harmon Ave. Tower C, LLC (collectively, the "Turnberry Harmon Ave. Entities"), respectively. The Turnberry Harmon Ave. Entities were formerly



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the managing members of each of the Tower Entities. On information and belief, the Turnberry Harmon Ave. Entities are wholly owned subsidiaries of Turnberry Residential Holdings, LP. On June 26, 2015, each of the Tower Entities filed a voluntary petition for protection under chapter 11 of title 11 of the United States Bankruptcy Code (11 U.S.C. § 101 et seq.), before the United States Bankruptcy Court for the State of Nevada, Las Vegas Division (Docket Nos. 15-13706-abl, 15-13708-abl and 15-13709-abl). At the time each Tower Entity filed a voluntary petition under chapter 11 they were managed by Andare Corp., a Nevada corporation, an entity under the control of Dr. Kenneth Wiles.



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G.3 FINANCIAL STABILITY & INTEGRITY

Please provide the following documents, for the last five (5) fiscal years and through the date of the application:

- h. Any financing amounts or ownership interests that are anticipated to come from minorities, women, and/or disadvantaged businesses. *If the applicant, or any portion of the applicant, is a public company, it is not necessary to list shareholders***

Not applicable.



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G.3 FINANCIAL STABILITY & INTEGRITY

Please provide the following documents, for the last five (5) fiscal years and through the date of the application:

- i. Examples and/or narratives that substantiate the applicant's understanding of and experience with Internal Controls.**

MGMS currently has in place robust Internal Controls regarding operations as a Category 1 licensee.



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General response applicable to all of section G.4

MGMS responses to each of the compliance questions contained in Section G.4 incorporates the following. Although the capitalized term “Key Person” is not defined in Chapter 23N, the Commission’s Regulations or the Sports Wagering Application, MGMS believes the scope of the term is limited to those who have the ability to exercise “control”¹ over the applicant and therefore must meet all the qualifications for licensure which for MGMS includes MGM Resorts International (MGMRI). *See* G.L. c. 23K, section 5(b). The compliance questions in this section therefore excludes any entity or individual that does not possess the requisite control including the operating subsidiaries of MGMRI that have not otherwise been designed a qualifier. Such a plain reading of Section G.4 is reasonably consistent with Chapter 23N. Nevertheless, in an effort to satisfy any questions the Commission may have regarding the compliance and licensing history of MGMS and MGMRI, the following answers in Section G.4 include the operating subsidiaries of MGMRI notwithstanding each of them has no ability to exercise control over MGMS and thus there is no requirement that such entities or individuals meet the qualifications for licensure under Chapter 23N.

Further, MGMS is subject to the Commission’s existing Regulations pertaining to “continuing duty”. *See* 205 CMR 115.01(4). These regulations require MGMS to update the Commission regarding certain matters including:

- Any denial, suspension or revocation by a government agency in any jurisdiction of a gaming related license, registration, certification, permit or approval held by or applied for by the gaming licensee or qualifier
- Any discipline, including a fine or warning, related to gaming operations imposed upon the gaming licensee or qualifier by any government agency in any jurisdiction
- Any fine related to gaming operations assessed on any gaming entity owned or operated by the parent to the gaming licensee by any government agency in any jurisdiction

MGMS has diligently met its reporting requirements under Section 115.01(4) and the Commission is fully knowledgeable of the Company’s compliance history through this reporting as well as through the Commission’s access to MGMRI’s Compliance Committee records including minutes and quarterly

¹ Under Chapter 23N “the following shall be considered to have control of an applicant: (i) a person who owns 10 per cent or more of a corporate applicant and who has the ability to control the activities of the corporate applicant; provided, however, that a bank or other licensed lending institution that holds a mortgage or other lien acquired in the ordinary course of business shall not be considered to have control of an applicant; (ii) a person who holds a beneficial or proprietary interest of 10 per cent or more of a non-corporate applicant’s business operation and who has the ability to control the activities of the non-corporate applicant; and (iii) at the commission’s discretion, an executive, employee or agent having the power to exercise significant influence over decisions concerning the applicant’s sports wagering operations in the commonwealth. G.L. c. 23N, section 5(b).



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compliance binders, which are routinely filed with the Commission. These records substantially exceed the requirements of the Sports Betting Application for compliance records and information.



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G.4 COMPLIANCE

Provide the following information on whether the applicant or its Key Persons has ever:

- a. Been employed by the Massachusetts Gaming Commission**

No current applicant or the applicant's Key Persons have been previously employed by the Massachusetts Gaming Commission.



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G.4 COMPLIANCE

Provide the following information on whether the applicant or its Key Persons has ever:

- b. Possessed a gaming license (casino, video gaming, charitable games, lottery, pari-mutuel, sports wagering, etc.) issued by any jurisdiction – *if so, please provide a copy of each license***

Please see the attached confidential list of gaming licenses held by the applicant or its Key Persons.



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G.4 COMPLIANCE

Provide the following information on whether the applicant or its Key Persons has ever:

- c. Held or holds a direct, indirect, or attributed interest in any business that intends to apply for a license with the Commonwealth**

Blue Tarp reDevelopment holds a Category 1 Gaming License in the Commonwealth of Massachusetts pursuant to Chapter 23K. As provided under the Sports Wagering Act, Blue Tarp reDevelopment will also be issued a Category 1 Sports Wagering License by the Commission pursuant to section 6(b)(1) of Chapter 23N. Under Chapter 23N, the Category 1 License provides Blue Trap reDevelopment with an additional 2 mobile platforms that must be licensed as a Category 3 Sports Wagering Operator. Blue Tarp has granted its rights to operate a mobile platform to BetMGM, LLC. MGM Resorts International, the parent company of Blue Tarp redevelopment, indirectly owns 50% of BetMGM, LLC through its wholly-owned subsidiary MGM Sports & Interactive Gaming, LLC.

MGM RESORTS INTERNATIONAL
GAMING LICENSING HISTORY

Pages 1 through 81

REDACTED



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G.4 COMPLIANCE

Provide the following information on whether the applicant or its Key Persons has ever:

- c. Held or holds a direct, indirect, or attributed interest in any business that intends to apply for a license with the Commonwealth**





**Blue Tarp reDevelopment, LLC d/b/a MGM Springfield
Massachusetts Gaming Commission
Application for Category 1 Sports Wagering Operator License
November 2022**

G.4 COMPLIANCE

Provide the following information on whether the applicant or its Key Persons has ever:

- d. Withdrawn a gaming license application, in any jurisdiction – *if so, please submit a detailed description of each withdrawal***

See, Investigations and Enforcement Bureau November 2013 Suitability Investigation for Blue Trap reDevelopment. As stated in the IEB's report, in 2009 MGM entered into a stipulation of settlement with N.J. regulators calling for the withdrawal of its renewal application for a casino license, with no admission of culpability, and requiring the sale by MGM of its 50 percent interest in the Borgata. The terms of the settlement agreement were later amended to allow MGM to re-apply to the N.J. Casino Control Commission for re-licensure in New Jersey. In February 2013, MGM re-applied for licensure in New Jersey which was granted in 2014.

Other than the foregoing withdrawal, any other prior withdrawals were the result of the abandonment of potential development projects and entirely unrelated to any alleged suitability issues. Please also see the attached confidential list of gaming licenses held by the applicant or its Key Persons for further information.



**Blue Tarp reDevelopment, LLC d/b/a MGM Springfield
Massachusetts Gaming Commission
Application for Category 1 Sports Wagering Operator License
November 2022**

G.4 COMPLIANCE

Provide the following information on whether the applicant or its Key Persons has ever:

- e. Been denied a gaming-related license or finding of suitability, in any jurisdiction –
*if so, submit a detailed statement describing the denial and/or related findings***

No. See also Answer G.4(d) above.



**Blue Tarp reDevelopment, LLC d/b/a MGM Springfield
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November 2022**

G.4 COMPLIANCE

Provide the following information on whether the applicant or its Key Persons has ever:

- f. Had a gaming license suspended, in any jurisdiction – *if so, include a detailed statement regarding each suspension***

No. See also Answer G.4(d) above.



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November 2022**

G.4 COMPLIANCE

Provide the following information on whether the applicant or its Key Persons has ever:

- g. Had a gaming license revoked, in any jurisdiction, or has had disciplinary action initiated to revoke a license – *if so, submit a detailed description of each revocation or action initiated***

No, except for the New Jersey matter described in Answer G.4(d) above, which was initiated, in part, by a question raised by the New Jersey Division of Gaming Enforcement, in a Special Report, as to whether MGM Resorts International (MGMRI) continued to meet the standards for qualification, which matter was ultimately settled with no admission of culpability by MGMRI. Such matter was fully considered by the Commission in or about November 2013.



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November 2022**

G.4 COMPLIANCE

Provide the following information on whether the applicant or its Key Persons has ever

- h. Had a gaming license non-renewed or considered for non-renewal, in any jurisdiction
– if so, provide a detailed description of the circumstances**

No, except for the New Jersey matter described in Answer G.4(d) above, which matter was fully considered by the Commission in or about November 2013.



**Blue Tarp reDevelopment, LLC d/b/a MGM Springfield
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November 2022**

G.4 COMPLIANCE

Provide the following information on whether the applicant or its Key Persons has ever:

- i. Been found unsuitable gaming license non-renewed or considered for non-renewal, in any jurisdiction – if so, provide a detailed description of the circumstances**

No, except for the New Jersey matter described in Answer G.4(d) above, which matter was fully considered by the Commission in or about November 2013.