

**APPLICATION FOR CATEGORY 1, 2, & 3
SPORTS WAGERING OPERATOR LICENSE**



APPLICANT NAME: Massasoit Greyhound Association, Inc.

Applicant: Massasoit Greyhound Association, Inc.

INSTRUCTIONS

When using this application please use the tab on the side to attach all sections requiring submissions. Each attachment should be named for its corresponding section (see (c) under Electronic Application for greater detail). Please make sure to fill out all sections where prompted. If a field does not apply please place N/A. The application must be filled out in its entirety to be accepted by the Massachusetts Gaming Commission.

General Information

This *Application For Category 1, 2, & 3 Sports Wagering Operator License* form (the form itself "Application Form", and along with all attachments "application") was designed by the Massachusetts Gaming Commission ("Commission") as a vehicle for each applicant to demonstrate that it has thought broadly and creatively about creating a sports wagering operation in Massachusetts that will provide a significant and lasting benefit to the Commonwealth of Massachusetts and will deliver an overall experience that both offers an exceptional sports wagering experience and includes significant responsible gaming and consumer protection measures.

The application must be completed in accordance with these instructions. In accordance, any discrepancies may be taken into consideration by the Commission when evaluating the application.

To the extent that an applicant is a newly formed entity or to date has been a largely non-operational entity, any information required to be provided relative to past performance or general practice shall, at a minimum, be provided in relation to the primary controlling and/or operating entity of the proposed sports wagering operator and/or its significant business units.

If an applicant is unable to comply with or respond to any part of the application, it may apply for a waiver or variance from the Commission in accordance with 205 CMR 102.03(4) {update reg info when available} in advance of the filing deadline.

All communications, including general questions and application inquiries, should be directed to the Executive Director or Commission staff.

How to submit a general question and/or application inquiry:

1. Please go to: <https://massgaming.com/about/sports-wagering-in-massachusetts/applications-for-sports-wagering-licenses/>
2. Select "Inquiry Regarding Sports Wagering Application" from the Reason for Submitting Form drop down menu
3. Complete all of the required fields
4. Click "Submit."

A Commission representative will respond to each inquiry in a timely manner. *At no time during the application process should any applicant, agent of the applicant, qualifier, or another associated individual contact or attempt to contact a Commissioner directly.*

This Application Form does not constitute an offer of any nature or kind to any applicant or its agents. The Commission is under no obligation to issue a license to any of the applicants. By submitting an Application, the applicant is deemed to agree to all of the terms of this process.

To the extent that anything contained in this application is inconsistent with any other guidance or policy-related document issued by the Commission in the past, this application shall control. To the extent that anything contained in this application is inconsistent with any provision of 205 CMR or G.L. c.23N, the governing law shall control.

Terms used in the application shall be given their most logical, plain meaning in the context of the application. The Commission reserves the right to amend or clarify this application at any time prior to the deadline for the submission of applications.

For each Application, all of the Commission's costs and expenses of the administrative proceedings pursuant shall be borne by the applicant. All such costs and expenses shall be assessed to the applicant and collected by the Commission.

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The Commission will utilize its website, www.massgaming.com, to provide notices of hearings, a notice of amendment or clarification of the Application Form, general updates, and general information relative to the application process.

Please be advised that any portion of this Application Form and any associated requests for information or documents may be changed at any time.

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Non-Refundable Processing Fee

Pursuant to G.L. c. 23N, § 7(a), an applicant for an operator license shall pay to the commission a nonrefundable processing fee of \$200,000 for the costs associated with the processing of the application and investigation of the applicant; provided, however, if the costs of the investigation exceed the initial application fee, the applicant shall pay the additional amount to the commission not more than 30 days after notification of insufficient fees or the application shall be rejected.

Applicants may pay the \$200,000.00 processing fee via wire transfer, certified check, or cashier's check. Wiring information may be obtained by contacting:

**Douglas O'Donnell
Revenue Manager
(617) 979-8425**

Checks must be made out to the Massachusetts Gaming Commission and mailed to:

**Massachusetts Gaming Commission
c/o Revenue Division
101 Federal Street, 12th Floor
Boston, MA 02110**

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Completing the Application

The application is divided into seven primary sections, each section containing questions relating to that section. The applicant should answer each question fully. While a cross-reference to other sections within the application may be included as part of an answer to a particular question, a cross-reference may not serve as the entire answer to any particular question. Please make sure to include the name of the applicant in the provided space at the top of the page for each question. If the answering of any question requires an attachment, please see below.

Format: Answers to questions should be formatted in the "Times New Roman" font, with a font size of 12.

Attachments: Where an applicant may wish to attach a document in response or to supplement its written response, or another exhibit of any nature, it may attach such documents and/or exhibits as set forth in the instructions for "Electronic Application Format." All attachments must be named and listed for the corresponding question. If the same attachment is responsive to multiple questions within the application, a copy of the attachment should be attached to each question, not just cross-referenced.

Every question must be answered completely. If a question or portion thereof is not applicable, enter "N/A" into the appropriate space on the application.

Applicants for Category 1 Sports Wagering Licenses and Category 2 Sports Wagering Licenses may refer the Bureau and Commission to prior application forms submitted to the Commission by the Applicant or previous information otherwise obtained by the Bureau or Commission regarding the Applicant.

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Submission of Materials

The Application must be submitted by the application deadline. The deadline for **all applications (Category 1, 2 & 3) is Monday, November 21, 2022, at 2 p.m.** The Commission shall have no obligation to accept or review an application submitted after the established deadline.

How to Submit an MGC Sports Wagering Operator License Application

Entities interested in applying for a Sports Wagering Operators License must request a link to the MGC Secure File Transfer Site prior to submitting their application form and any additional documents. This link will allow for the secure and confidential upload and storage of all application materials.

How to Request a Link to the MGC Secure File Transfer Site:

Please Note: All link requests must be received no later than one week before the application deadline (November 14, 2022).

1. Please go to: <https://massgaming.com/about/sports-wagering-in-massachusetts/applications-for-sports-wagering-licenses/>
2. Select "Request Secure Link to Submit Completed Sports Wagering Application" from the Reason for Submitting Form drop down menu
3. Complete all of the required fields
4. Click "Submit."

A Commission representative will provide the requested link and additional instructions on uploading the application materials securely via email. The information will be sent in two emails, with the link being in the first email and the password sent separately in the second email, for security purposes.

Electronic Application Format

When the electronic version of the application materials is submitted via the MGC Secure File Transfer Site and uploaded to the Commission's server, the applicant must abide by the following:

- (a) The applicant must submit this original completed Application Form that has not been printed, signed, and scanned, but with all answers electronically filled in, all attachments identified, and all necessary boxes checked. This version is being required so that it may be searched electronically by the Commission during the evaluation process. This document must be in PDF format.
- (b) The applicant must also submit this completed Application Form with all answers electronically filled in, all attachments identified, all necessary boxes checked, and all required signatures affixed. This version is identical to the document described in (a) above, but it should also be printed, signed, and scanned. This scanned document must be in PDF format.
- (c) The applicant must submit each attachment as its own electronic file. No electronic file should contain more than one document. Each attachment should be in PDF format unless otherwise required. The file names of all of the attachments must be named strictly in accordance with the following rules:
 - The first portion of the filename must contain the section number and subsection of the question followed by a hyphen, then and the attachment number for that particular question with a leading zero for numbers under 10 (e.g. "B1-b-##").
 - The file name should then contain the descriptive name of the attachment, in at most 20 characters.
 - The name of the attachment must not contain the name of the applicant.
 - The final portion of the filename should be the extension, such as ".pdf" or ".xls".
 - The file name should correspond to the list of attachments on the Application Form.
 - If the Applicant believes the attachment to be confidential, in whole or in part (i.e.- exempt from disclosure under the Public Records Law), then the filename must have the word "CONFIDENTIAL" in all capital letters placed directly before the file extension. Failure to include this label may result in the public release of the document.

Although a PDF version of each attachment is required, in certain cases providing an alternative file format may be helpful to the Commission in reaching its decision. For example, where the applicant is required to submit tables of calculations, such as a revenue projection, it should be submitted in spreadsheet format so that the Commission may numerically analyze this information. The applicant may also, although not required, provide other documents such as videos, interactive documents, or physical models. These types of documents do not readily lend themselves to conversion into PDF format. For these documents, the applicant should provide both the document in original format, and a PDF file describing the existence of such a document within the applicant's application materials. The file name of the alternate format, if it is in fact a computer-readable file, and the filename of the PDF format of the attachment should be identical, excluding the file extension.

No electronically submitted document to the Commission may be password protected. The individual documents should not be encrypted separately.

Any attachments containing a table of calculations, such as a revenue projection, should be included in the electronic submission in a spreadsheet format, preferably Microsoft Excel ".xls" files.

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The following is an example of select files of a properly organized application:

B2-a-01 Additional Sports Wagering Licensure Information.pdf

B2-a-02 Additional Sports Wagering Jurisdiction Information.pdf

C2-a-01 Revenue Projections CONFIDENTIAL.pdf

C2-b-01 Revenue Projections CONFIDENTIAL.xls

Application.pdf

Signed Application.pdf

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Public Records

Pursuant to G.L. c. 23N, §6(i), “[a]pplications for operator licenses shall be public records” Applicants should be mindful of this prior to submission of an Application. However, the law also provides “that trade secrets, competitively-sensitive or other proprietary information provided in the course of an application for an operator license under [chapter 23N], the disclosure of which would place the applicant at a competitive disadvantage, may be withheld from disclosure under [the Massachusetts public records law].”

To help inform applicants of the Commission’s intentions, a guide has been attached at the end of the Application advising which answers and attachments submitted with this form will be considered to presumptively meet the exception to the public records law and withheld from public disclosure. There is also space for an applicant to request exempt treatment of a specific document identified in the Application. **FAILURE TO FOLLOW THE INSTRUCTIONS PROVIDED IN THE GUIDE MAY RESULT IN PUBLIC RELEASE OF THE DOCUMENTS.**

Please note, though the Commission will use its best efforts to protect any information it deems subject to an exemption, final appeals are adjudicated by the Secretary of the Commonwealth in accordance with G.L. c.66, §10.

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Checklist

Complete this checklist prior to submitting any materials to the Commission.

- The applicant has answered all of the questions in this Application Form that it was required to respond to
- Any question requiring an attachment has the attachment noted on the Application Form
- The applicant properly named all the files
- The applicant has properly organized all of the attachments
- No files have been password protected
- The applicant has signed all required pages of this application
- The applicant has paid the \$200,000.00 non-refundable processing fee
- The applicant will update the Commission if there are any changes to the information presented in the Application or any of the attachments.

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SECTION A: GENERAL INFORMATION

A.1 APPLICANT NAME

Massasoit Greyhound Association, Inc.

Name

A.2 CATEGORY OF LICENSE APPLYING FOR (check one)

- Category 1 (In-Person Wagering at a Gaming Establishment)
 Category 2 (In-Person Wagering at a Live Horse Racing or Simulcasting Facility)
 Category 3 (Mobile Sports Wagering)

A.3 IF APPLYING FOR CATEGORY 3 (MOBILE SPORTS WAGERING) LICENSE, IS THIS APPLICATION TETHERED TO A CATEGORY 1 OR CATEGORY 2 APPLICATION (check one)

- No (Independent Application)
 Yes, Tethered to Category 1 or Category 2 Applicant (applicant name):

n/a

A.4 STATE/COUNTRY IN WHICH THE BUSINESS ENTITY IS INCORPORATED, ORGANIZED, FORMED, OR REGISTERED

Massachusetts

State/Province

United States

Country

A.5 IDENTIFY THE APPLICANT'S TYPE OF BUSINESS (check one)

- Limited Liability Company Partnership Other (please describe):
 C-Corporation Limited Partnership
 S-Corporation Trust
 Sole Proprietorship

A.7 FEDERAL TAX ID NUMBER

[REDACTED]

Federal Tax ID Number

A.6 APPLICANT LOCATION INFORMATION

1900 Broadway

Number and Street Address

Raynham, MA 02767-0172

City, State, & Zip Code

508-824-4071

Phone Number

srodrigues@rtgp.com

Email Address

www.raynhampark.net

Website

A.7 APPLICANT PRINCIPAL PLACE OF BUSINESS INFORMATION

1958 Broadway

Number and Street Address

Applicant: Massasoit Greyhound Association, Inc.

Raynham, MA 02767-0172

508-824-4071

City, State, & Zip Code

Phone Number

srodrigues@rtgp.com

Email Address

A.7 PRIMARY CONTACT FOR THIS APPLICATION

Joseph Capucci

CFO

Name

Title

jac@rtgp.com

508-824-4071

Email Address

Phone Number

SECTION B: SPORTS WAGERING EXPERIENCE & EXPERTISE

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
- b. Experience and licensure in other jurisdictions with sports wagering
- c. Plans to offer the platform in coordination with other applicants or person
- d. Intention to limit participation in any allowable sports events

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
- b. Overview of wagering activity
- c. Estimated volume of wagering activity (*annually*)
- d. Estimated market share within each jurisdiction

B.3 SPORTS WAGERING EXPERIENCE - DESCRIPTION OF SPORTS WAGERING PLATFORM
(Category 3 Applicants Only)

Provide a thorough description of the sports wagering platform to be operated in the Commonwealth. This should include the following:

- a. Description of the customer experience, including options, promotions, and offers
- b. Overview of wagering activity
- c. Estimated volume of wagering activity (*annually*)
- d. Jurisdictions where the platform is currently licensed and operating
- e. Current integration in use with other wagering operators
- f. The number of user accounts maintained
- g. Estimated market share within each jurisdiction

B.4 SPORTS WAGERING EXPERTISE – TECHNICAL FEATURES & OPERATION OF PLATFORM
(Category 3 Applicants Only)

Provide a thorough description of the applicant's expertise in sports wagering and how it would be applicable in the Commonwealth. This should include the following:

- a. Overview of technical standards, features, and operation of the platform
- b. List of all current certifications or approvals from certified independent test labs and jurisdictions
- c. Plan for continuous support, maintenance, and change management of the platform
- d. Outline the features of the platform designed to support the customers
- e. Sample wagering menu the Applicant intends to offer, *pending approval from the Commission*
- f. Description of Applicant's proposed ability to commence mobile sports wagering on the platform
- g. How the Applicant intends to prevent wagering by prohibited persons, including underage persons, problem gamblers, employees, etc.
- h. Outline any technology to be used or features offered that the applicant believes sets their platform apart from those of (potential) other applicants

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
- b. The number of current work locations within the Commonwealth
- c. The number of proposed full-time and part-time positions that will be created within the Commonwealth
- d. The title, job description, salary, and benefits information for each of the proposed positions
- e. The training that will be required and made available for all proposed positions
- f. The number of proposed work locations that will be created within the Commonwealth
- g. Description of plans for workforce development opportunities for Applicant's staff within the Commonwealth
- h. Outline the strategy for focusing on job opportunities and training in areas and demographics with high unemployment and/or underemployment

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:

- a. Projected figures for sports wagering revenue and methodology used to arrive at these projections
- b. Projected figures for any non-sports wagering revenue and methodology used to arrive at these projections
- c. Projected figures for all tax revenue to the Commonwealth and methodology used to arrive at these projections
- 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*
- 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

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
- b. Proposed location within the gaming establishment, including plans for the construction of a new section within the gaming floor and/or any potential additions to the facility
- c. Approximate square footage of the sports wagering area
- d. Secure location for storing funds issued by a cage, to be used in the operation, including all security measures and procedures

- e. Proposed security and surveillance of the sports wagering area and operation and how the applicant intends to prevent wagering by prohibited persons, including underage persons, problem gamblers, employees, etc.
- f. Reasonable measures the applicant will take to ensure the safety and security of all employees and patrons of any sports wagering related events
- 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
- h. Number and location(s) of ticket window(s)
- i. Number and location(s) of wagering kiosk(s)
- j. Location and display format for all wagers, available to the public
- k. Location of posting of house rules
- l. *If applicable* – description regarding any proposal of providing food, beverages, and other concessions to patrons

C.4 CONSTRUCTION – LIVE HORSE RACING/SIMULCASTING FACILITY (Category 2 Applicants Only)

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

- a. Location of proposed sports wagering operation (*address*)
- b. A detailed timeline of construction
- c. Proposed location of sports wagering area within the facility, including plans for the construction of a new section and/or any potential additions to the facility
- d. Approximate square footage of the sports wagering area
- e. Secure location for storing funds issued by a cage, to be used in the operation, including all security measures and procedures
- f. Proposed security and surveillance of the sports wagering area and operation and how the applicant intends to prevent wagering by prohibited persons, including underage persons, problem gamblers, employees, etc.
- g. Reasonable measures the applicant will take to ensure the safety and security of all employees and patrons of any sports wagering-related events
- h. 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
- i. Number and location(s) of ticket window(s)
- j. Number and location(s) of wagering kiosk(s)
- k. Location and display format for all wagers, available to the public
- l. Location of posting of house rules
- m. *If applicable* – description regarding any proposal of providing food, beverages, and other concessions to patrons

Capital Investment

In accordance with G.L. c.23N, §3, Category 2 licensees shall make a capital investment of not less than \$7,500,000.00 within 3 years after receiving a sports wagering license, which the applicant must agree to expend.

Please provide a thorough description, including the following:

- n. How the applicant proposes to realize the required capital investment
- o. The financial commitments and guarantees the applicant is prepared to provide the Commission
- p. How the applicant will ensure that the project is completed, the license conditions are fulfilled, and sufficient working capital is available to allow operation in the promised fashion
- q. Any mitigation measures the applicant will take to reduce any impact on the local community

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 customers

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*
- b. Applicant's workforce diversity, equity, and inclusion policy
- c. Workforce demographics, demonstrating the applicant's current workforce diversity
- d. Efforts to be made to cultivate workforce diversity, equity, and inclusion by identifying, recruiting, and hiring minorities, women, persons with disabilities, and veterans
- 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

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:

- a. Minority-owned business enterprises
- b. Women-owned business enterprises
- c. 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

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*
- a. 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

SECTION E: RESPONSIBLE GAMING

E.1 RESPONSIBLE GAMING POLICIES

Referencing the following documents:

- MGC Responsible Gaming Framework
- Applying Principles of the Massachusetts Responsible Gaming Framework to Sports Wagering Policy & Practice
- GameSense Logic Model
- Responsible Gaming Considerations for Gambling Advertising

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

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
- b. Promotion and player loyalty programs
- c. Advertising plans – *must include information for any third-party marketing firm applicant plans to partner with for advertising in the Commonwealth*
- d. Measures to ensure that marketing reaches the target audience and not underage or vulnerable populations
- e. Player acquisition models – *specify minimum age to participate*
- f. Plans to incorporate responsible gaming and problem gambling information
- g. Strategies for converting those customers wagering via unlicensed or illegal means to wagering legally in the Commonwealth
- h. Examples of marketing, advertising, and promotional materials/activities recently used in other jurisdictions

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

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

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

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
- b. Systems for monitoring structured wagers, real-time data feed, and any unusual or suspicious wagering activity
- c. Description, location, and periodic testing of servers
- d. Security of servers, applications, and communications networks
- e. Security of patron personal and wagering information
- f. Integrity monitoring and reporting, including any current affiliations related to integrity monitoring

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

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

G.3 FINANCIAL STABILITY & INTEGRITY

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

- 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*
- 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*
- 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
- What are the Applicant's annual liquidity, leverage, and profitability ratios, including current ratio, debt-to-equity ratio, and gross/net margin ratios?
- 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*
- 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
- 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
- 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*
- Examples and/or narratives that substantiate the applicant's understanding of and experience with Internal Controls.

G.4 COMPLIANCE

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

- Been employed by the Massachusetts Gaming Commission
- 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*
- Held or holds a direct, indirect, or attributed interest in any business that intends to apply for a license with the Commonwealth
- Withdrawn a gaming license application, in any jurisdiction – *if so, please submit a detailed description of each withdrawal*
- 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*
- Had a gaming license suspended, in any jurisdiction – *if so, include a detailed statement regarding each suspension*
- 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*
- Had a gaming license non-renewed or considered for non-renewal, in any jurisdiction – *if so, provide a detailed description of the circumstances*
- Been found unsuitable gaming license non-renewed or considered for non-renewal, in any jurisdiction – *if so, provide a detailed description of the circumstances*

Applicant: Massasoit Greyhound Association, Inc.

SIGNATURE FORMS

Applicant: Massasoit Greyhound Association, Inc.

VERIFICATION AND AUTHENTICATION

The applicant, Massasoit Greyhound Association, Inc., hereby authorizes the Commission, the Executive Director of the Commission, the Investigations and Enforcement Bureau, and/or their respective designees to take all necessary and reasonable steps to verify and authenticate any information or materials submitted in conjunction with this application and agrees to fully cooperate in such an inquiry. Further, the applicant is aware that if any of the responses to any question in this application are determined to be false, or if they are misleading, the application may be denied. The applicant acknowledges its continuing duty to provide updated information and/or promptly notify the Commission of any changes to the information or materials, of which it becomes aware or should be aware, that were provided in response to any question in this application.

Joseph Cappucci

Name of Authorized Individual

CFO

Position with Applicant

Joseph A Cappucci

Signature of Authorized Individual

1/12/2023

Date

Applicant: Massasoit Greyhound Association, Inc.

ATTESTATION

I, Joseph Cappucci, on behalf of Massasoit Greyhound Association, Inc. hereby swear or affirm under the pains and penalties of perjury that the information contained in this Application form and all materials accompanying said form are true and accurate to the best of my knowledge and understanding; that I have reviewed the information contained in the Application form for accuracy; that I read and understand the questions and responses on the Application form; that any document accompanying this Application that is not an original document is a true copy of the original document; that I have read and understood all applicable provisions of 205 CMR and G.L. c.23N; that the applicant agrees to all terms, conditions, and obligations made applicable to all applicants for a sports wagering operator license; that in the event that the applicant is awarded an operator license it agrees to all obligations, terms, and conditions imposed upon a successful applicant; and that I am authorized to submit this application on behalf of the applicant.

Joseph Cappucci

Name of Authorized Individual

CFO

Position with Applicant

Joseph Cappucci

Signature of Authorized Individual

11/12/2023

Date

Applicant: Massasoit Greyhound Association, Inc.

WAIVER OF LIABILITY

Massasoit Greyhound Association, Inc.

hereby holds the Commonwealth of Massachusetts and its instrumentalities and agents, including but not limited to the Massachusetts Gaming Commission and its agents, representatives and employees harmless, both individually and collectively, from any and all claims of liability for damages of whatever kind, resulting at any time from any disclosure or publication of information acquired during the application process or the use of any information provided in furtherance of this application.

Joseph Cappucci

Name of Authorized Individual

CFO

Position with Applicant

Joseph Cappucci

Signature of Authorized Individual

1/12/2023

Date

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SECTION B: SPORTS WAGERING EXPERIENCE & EXPERTISE

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

Massasoit Greyhound Association, Inc. ("MGA" or "Raynham Park") has operated a greyhound racing and simulcast betting facility in Massachusetts since 1964. MGA currently holds a chapter 128C greyhound meeting license issued by the Legislature and regulated by the Commission. As provided in Chapter 23N, MGA conducted simulcast wagering as of December 31, 2020.

MGA is pleased to enter into an agreement with American Wagering, Inc. ("AWI" or "Caesars Sportsbook"), a Nevada corporation, and a wholly owned subsidiary of Caesars Entertainment, Inc. ("Caesars Entertainment"), to provide comprehensive retail sportsbook services to MGA as the Category 2 Licensee and responsible operator. Caesars Sportsbook has the largest footprint of any sports betting company in North America with sports betting operations in 29 jurisdictions across North America, including Arizona, Colorado, Delaware, District of Columbia, Illinois, Indiana, Iowa, Kansas, Louisiana, Maryland, Michigan, Mississippi, Nevada, New Jersey, New Mexico, New York, North Carolina, Ohio, Pennsylvania, Puerto Rico, Rhode Island, Tennessee, Virginia, Washington, Wyoming and West Virginia, as well as Ontario, Canada, St. Kitts, and The Bahamas. Caesars Sportsbook offers retail sports wagering at over 180 sportsbooks across 25 jurisdictions and mobile sports wagering in 21 jurisdictions.

Caesars Sportsbook's Proprietary Liberty Platform

Caesars Sportsbook owns and controls its proprietary sports betting technology platform, referred to as "Liberty." The development of the platform is primarily done in-house at its Jersey City, New Jersey and Las Vegas, Nevada offices. Components of the platform include: [REDACTED]

The pricing and trading operations are owned and operated by Caesars Sportsbook, including the proprietary algorithmic models that predominantly power most of its markets. Some of the sports data feeds used to feed the models, power lower tier sports, or settle certain markets are provided by [REDACTED]

[REDACTED] AWI's platform is integrated with a variety of data feeds and live scoreboards from sports around the world, and it uses official data feeds from the major U.S. sports leagues, including from the MLB, NBA, NHL, and NFL.

Caesars Sportsbook employs over 1,750 people in its sports betting and online gaming division. In addition to its technology services, it provides marketing, trading and risk management, customer service,

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compliance, financial reporting, and responsible gaming as part of its sports and online gaming operations.

Sports Betting Offerings

Caesars Sportsbook offers wagering on all major sports and sporting events. Caesars Sportsbook covers every NFL, MLB, NBA, NHL, and MLS game and has extensive NCAA sports coverage as regulations permit. Additionally, Caesars Sportsbook covers select games and events from other sports, as regulations permit, including:

- Australian Rules Football
- E-Sports
- Soccer
- Auto Racing
- Golf
- Table Tennis
- Boxing
- Handball
- Tennis
- Cricket
- Mixed Martial Arts
- Volleyball
- Cycling
- Rowing
- Darts
- Snooker

Below is a sample menu of Caesars Sportsbook’s current futures and other wagering options. Note, the menu may vary from state to state to comply with local state regulations.

Sport	Current Futures and Other Wagering Options
Football	<ul style="list-style-type: none"> • 2022–23 Select Pro Football Playoff Matchups • 2022–23 Futures To Win 22-23 AFC Championship • 2022–23 Futures To Win Pro Football Championship 57 • 2022–23 Regular Season MVP Award • 2022–23 Division To Win Pro Football Championship 57 • 2022–23 Pro Football Championship Props • 2023 To Win 2023 Heisman Trophy
Basketball	<ul style="list-style-type: none"> • 2022–23 Pro Basketball Regular Season MVP • 2022–23 Pro Basketball Rookie of the Year Futures • 2022–23 Pro Basketball Futures to Win Championship • 2023 Women’s Pro Basketball Futures To Win 2023 Championship • 2023 To Win Women’s College Basketball Championship • German BBL Basketball • Euroleague Basketball Matches
Baseball	<ul style="list-style-type: none"> • 2023 To Win 2023 Pro Baseball Championship • 2023 Regular Season Win Totals • 2023 To Win Divisions • 2023 To Win American/National League • 2023 Home Run Title • 2023 To Win 2023 World Baseball Classic
Hockey	<ul style="list-style-type: none"> • 2022–23 Pro Hockey Futures To Win Championship

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Sport	Current Futures and Other Wagering Options
	<ul style="list-style-type: none"> • 2022–23 Hart Trophy Futures • 2022–23 President’s Trophy Futures • 2022–23 Pro Hockey Regular Season Goal Scoring Leader • 2022–23 Pro Hockey Make/Miss Playoff Prop for Select Teams • 2022–23 Pro Hockey Division Futures • 2022–23 Pro Hockey Regular Season Points Prop
Soccer	<ul style="list-style-type: none"> • Copa America Matches • English Premier League Matches • UEFA Champions League Matches • La Liga Soccer Matches • 2022–23 English Premier League Futures • 2023 MLS Cup Soccer Futures and Select Matchups • 2023 Liga MX Clausura Futures
Golf	<ul style="list-style-type: none"> • 2023 Masters Futures, Matchups, and Props • 2022–23 To Win Fed Ex Cup • 2023 To Win PGA Championship • 2023 To Win US Open • 2023 To Win The Open • 2023 PGA Tour Event Futures • 2023 LPGA Tour Event Futures
Auto Racing	<ul style="list-style-type: none"> • 2023 To Win NASCAR Cup Championship • 2023 F1 Drivers Championship • 2023 Daytona 500 • 2023 Indianapolis 500 • 2023 Formula 1 Las Vegas Grand Prix Futures • 2023 F1 Constructors Future • 2023 F1 Drivers Champion Future
Boxing / MMA	<ul style="list-style-type: none"> • UFC 283 on January 28, 2023 • Kongo vs Essuman on January 21, 2023 • Yarde vs Beterbiev on January 28, 2023 • Wilson vs Navarrete on February 3, 2023 • Cruz vs Serrano on February 4, 2023 • Professional Fighters League 2023 Matches • UFC Contender Series Select fights
Tennis	<ul style="list-style-type: none"> • 2023 Select Tennis Matches • To Win 2023 Men’s Aussie Open Futures • To Win 2023 Women’s French Open Futures • To Win 2023 Women’s Wimbledon Futures

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Sport	Current Futures and Other Wagering Options
	<ul style="list-style-type: none"> • To Win 2023 Men’s Wimbledon Futures • To Win 2023 Women’s US Open Futures • To Win 2023 Men’s US Open Futures
Cycling	<ul style="list-style-type: none"> • 2023 to Win the Tour De France
Rugby	<ul style="list-style-type: none"> • 2023 NRL Grand Final Futures • 2023 To Win Rugby World Cup • 2023 Rugby Six Nations Futures
Lacrosse	<ul style="list-style-type: none"> • 2023 Select Premier Lacrosse League Matchups • 2023 To Win PL Lacrosse Championship and Matches
Cricket	<ul style="list-style-type: none"> • 2023 Select Cricket Matchups

Self-Service Kiosks

In addition to teller-operated terminals, Caesars Sportsbook offers self-service wagering via kiosks. At Raynham Park, kiosks will be placed in permitted areas (all restricted to those 21 years of age and older), making retail wagering convenient and accessible to patrons. Caesars Sportsbook’s kiosks enable betting on its pre-match and live wagering menu via cash, vouchers, and accounts. Caesars Sportsbook’s kiosks include a high-resolution, dual-screen system for point-of-sale marketing, statistics, streaming content and include video surveillance for security purposes.



Odds Display Screens

Betting opportunities are displayed on screens around the sportsbook. Information delivered to the odds display provides patrons with up-to-date lines and the betting menu.

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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

As set forth in response to question B.1(a) Raynham Park has operated a greyhound racing and simulcast betting facility in Massachusetts since 1964. MGA currently holds a chapter 128C greyhound meeting license issued by the Legislature and regulated by the Commission. As provided in Chapter 23N, MGA conducted simulcast wagering as of December 31, 2020. MGA is pleased to enter into an agreement with Caesars Sportsbook to provide comprehensive retail sportsbook services to MGA as the Category 2 Licensee and responsible operator.

Caesars Sportsbook is licensed and operating sports wagering or providing sports wagering trading and risk management services in the following 29 North American jurisdictions.

- Arizona
- Colorado
- Delaware
- District of Columbia
- Illinois
- Indiana
- Iowa
- Kansas
- Louisiana
- Maryland
- Michigan
- Mississippi
- Nevada
- New Jersey
- New Mexico
- New York
- North Carolina
- Ohio
- Pennsylvania
- Rhode Island
- Tennessee
- Virginia
- West Virginia
- Washington
- Wyoming
- Ontario, Canada
- Puerto Rico
- St. Kitts
- The Bahamas

Caesars Sportsbook offers retail sports wagering at over 180 sportsbooks across 25 jurisdictions. Below are select examples of Caesars Sportsbook's retail wagering experiences.

Harrah's Hoosier Park (Indiana)

The Caesars Sportsbook at Harrah's Hoosier Park, which opened in September 2019, features eight odds display screens, a high-definition video wall, and luxury seating. The state-of-the-art sportsbook has three betting windows and 10 self-service kiosks. It is adjacent to The Terrace Showroom with convenient access to horse racing, food and beverage outlets and the casino.

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Horseshoe Indianapolis (Indiana)

The Caesars Sportsbook at Horseshoe Indianapolis, which opened in September 2019, features eight odds display screens, a high-definition video wall, and is adjacent to the Brew Brothers restaurant. The sportsbook has three betting windows and eight self-service kiosks.



Winner's Circle – Clarksville, Indianapolis, & New Haven (Indiana)

The Caesars Race & Sportsbooks at Winner's Circle in Clarksville, Indianapolis, and New Haven, which opened in September 2019, each offer state-of-the-art sports betting technology, high-definition television screens, and comfortable accommodations, as well as convenient access to horse racing, and delicious pub and bar offerings.

The Clarksville sportsbook features eight odds display screens, over 40 television screens, and five betting windows and 24 self-service kiosks. The Indianapolis sportsbook features six odds display screens, a high-definition video wall, over 25 television screens, and five betting windows and 11 self-service kiosks. The New Haven sportsbook features six odds display screens, over 30 television screens, and four betting windows and nine self-service kiosks.

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Monmouth Park Racetrack (New Jersey)

The Caesars Sportsbook at Monmouth Park Racetrack opened in June 2018 and features a 75-foot video wall and over 100 television screens on the first floor of the Monmouth Park Grandstand. Adjacent to the sportsbook is the Caesars Sports Bar, which features an additional 50 television screens.



Chase Field (Arizona)

The Caesars Sportsbook outside of Chase Field in Downtown Phoenix, in partnership with the Arizona Diamondbacks, opened in June 2022. The two-story, 20,000 square-foot, state-of-the-art sportsbook features 10,000 square feet of indoor and outdoor dining space, 1,500 square feet of indoor and outdoor LED screens, and seating capacity for over 300 people. The sports betting space, spanning across two floors, includes nine betting windows and 13 self-service kiosks. The food and beverage concept, Guy Fieri's Downtown Phoenix Kitchen + Bar, is operated by Levy Restaurants and is part of a brand licensing agreement with celebrity chef Guy Fieri.

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Capital One Arena (District of Columbia)

The Caesars Sportsbook at Capital One Arena, in partnership with Monumental Sports & Entertainment, owner of the Washington Capitals and Washington Wizards opened in May 2021 and was the first ever sportsbook to open within a U.S. professional sports venue. The two-story, 18,000 square-foot, state-of-the-art sportsbook and restaurant features a custom 1,500 square-foot LED screen that wraps the entire venue, and more than 100 television screens, including four positioned on all sides of a jumbotron (a replica of the one inside Capital One Arena at center ice/center court) that hangs from the ceiling in the center of the venue. The sports betting space, spanning across two floors, includes 17 betting windows and 20 self-service kiosks. The food and beverage concept, Guy Fieri's DC Kitchen + Bar, is operated by Aramark.



Other Caesars Sportsbooks in racing facilities and professional sports venues include Arizona Downs, Louisiana Downs, Mountaineer Park in West Virginia, Prairie Meadows in Iowa, and Eldorado Scioto Downs and Rocket Mortgage FieldHouse in Ohio.

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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**

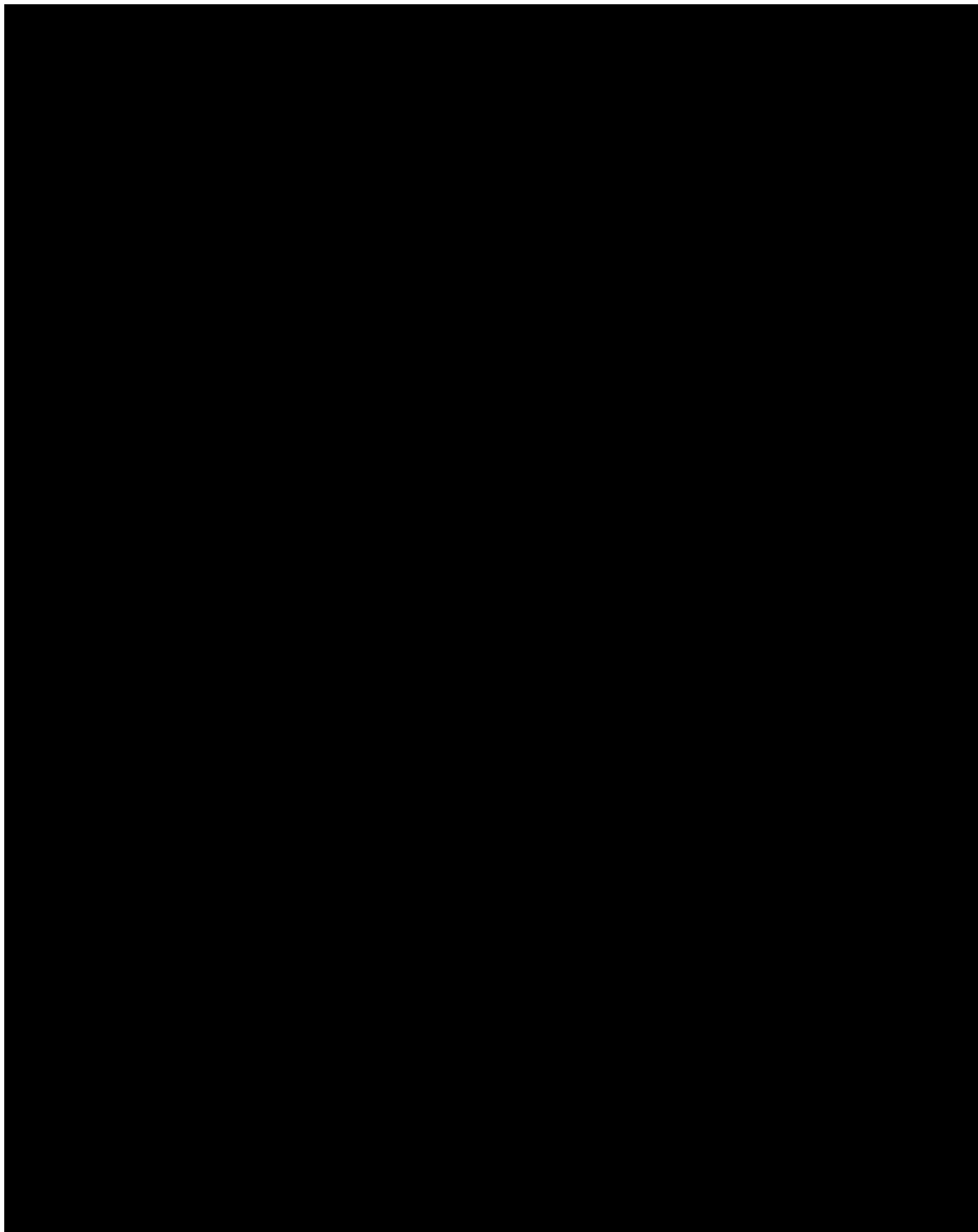
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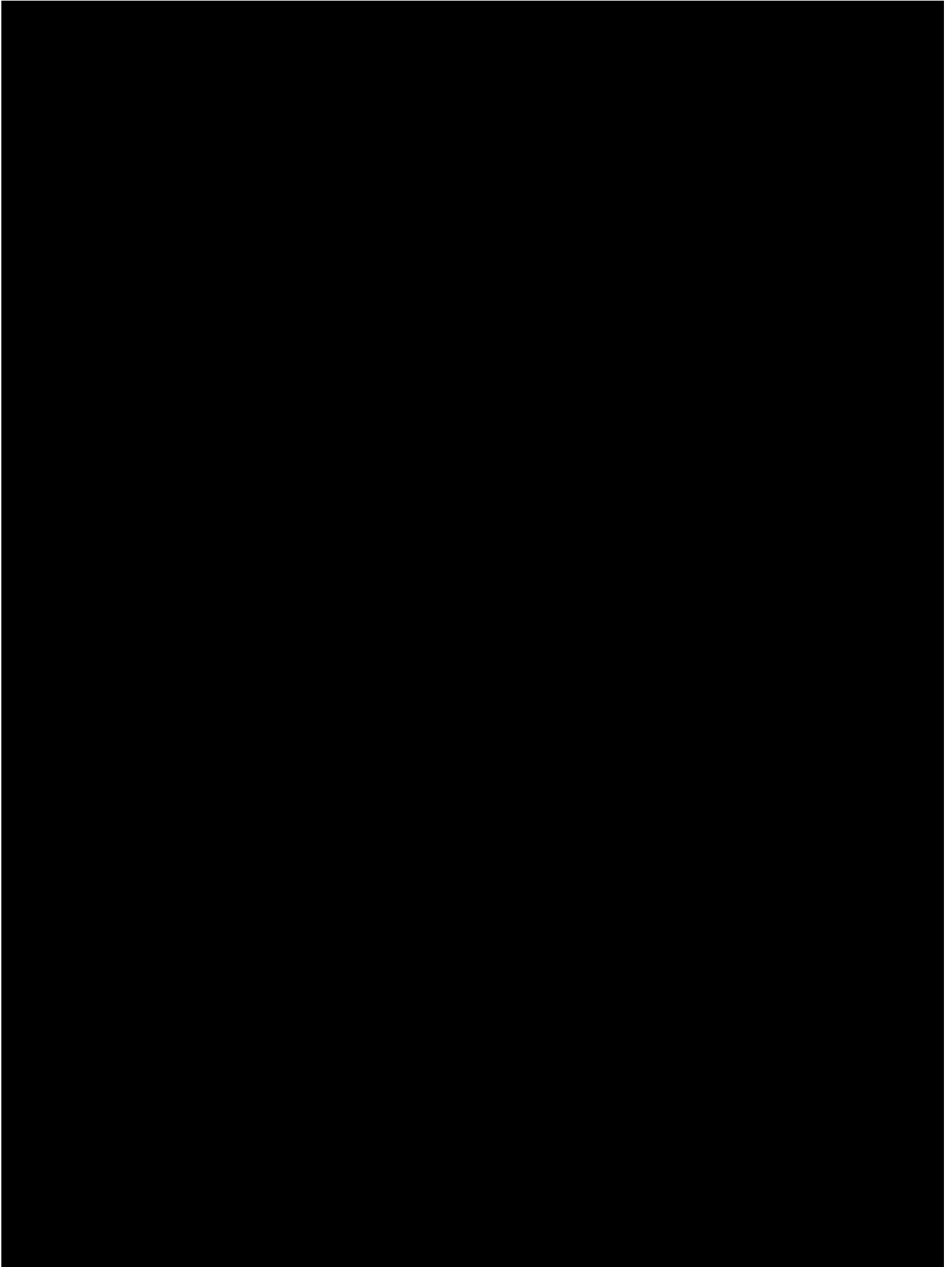
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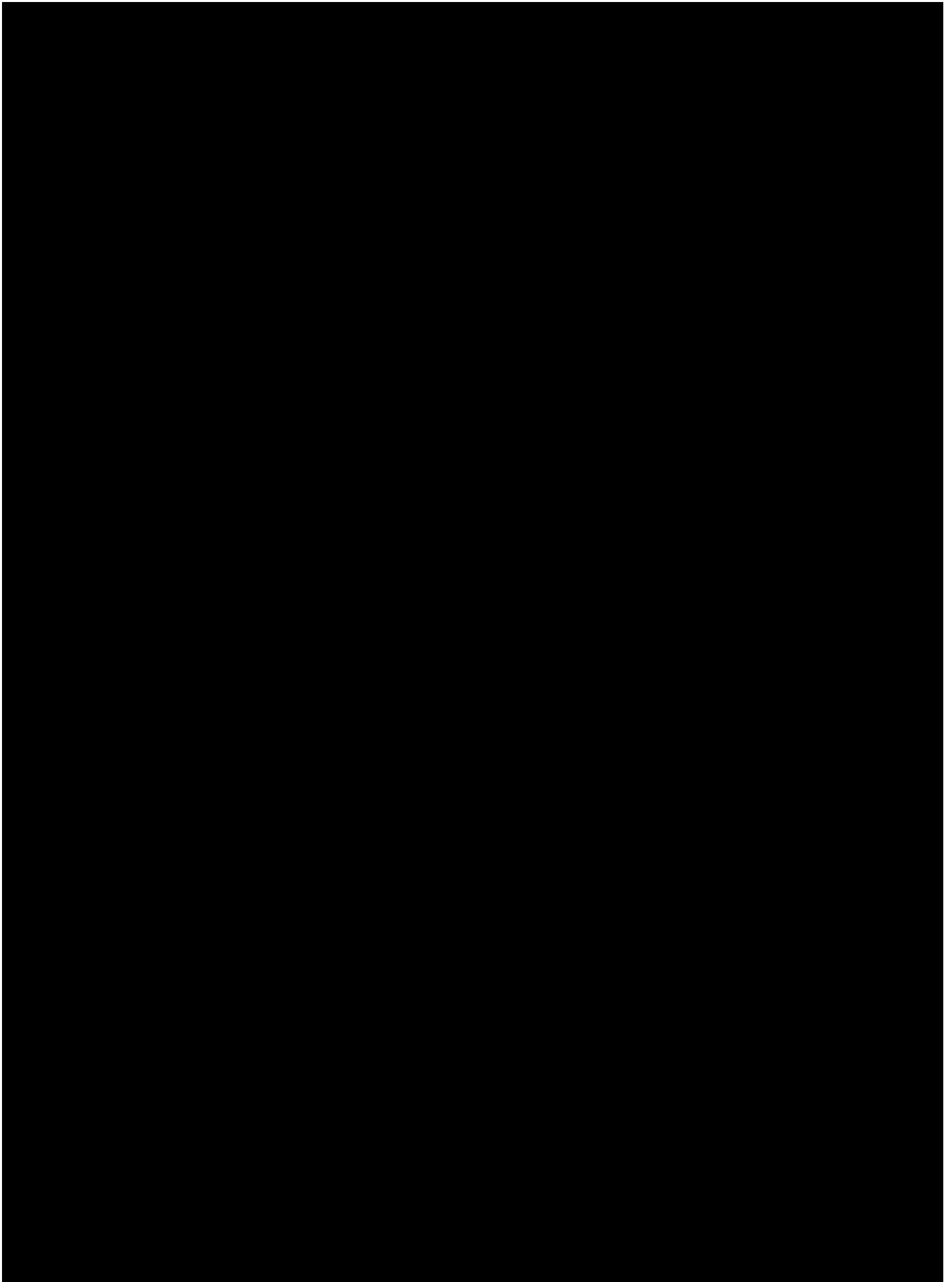
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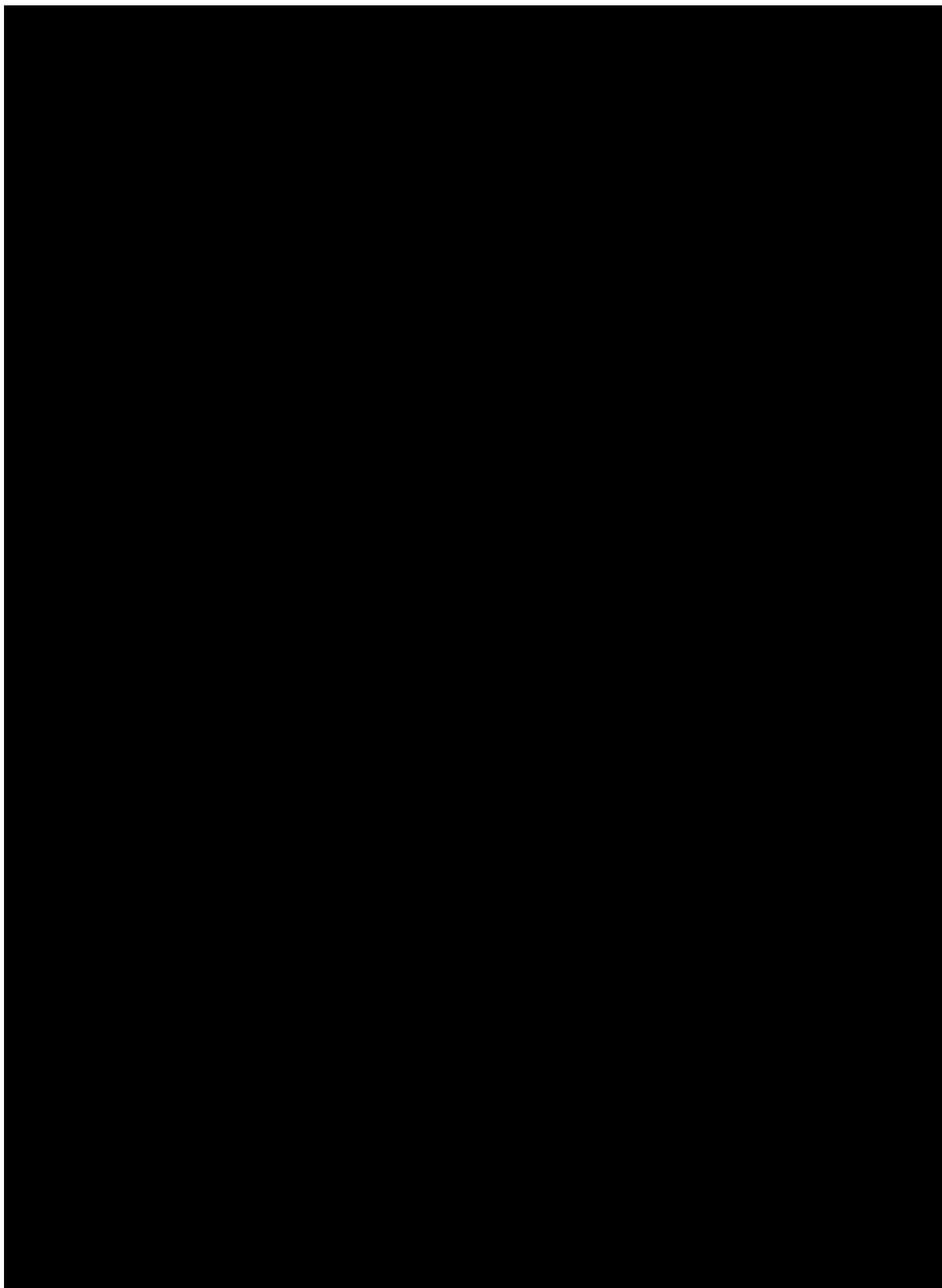
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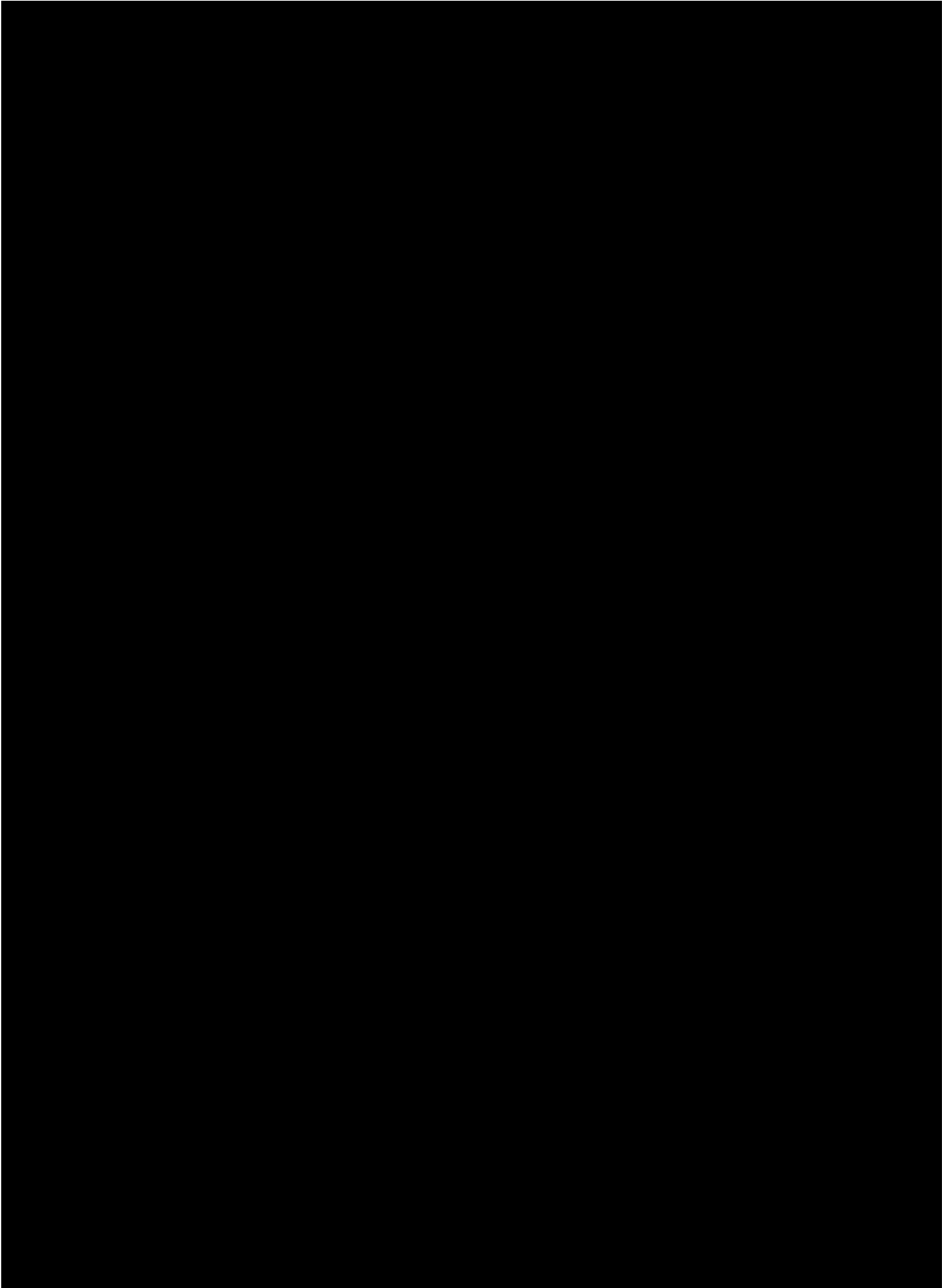
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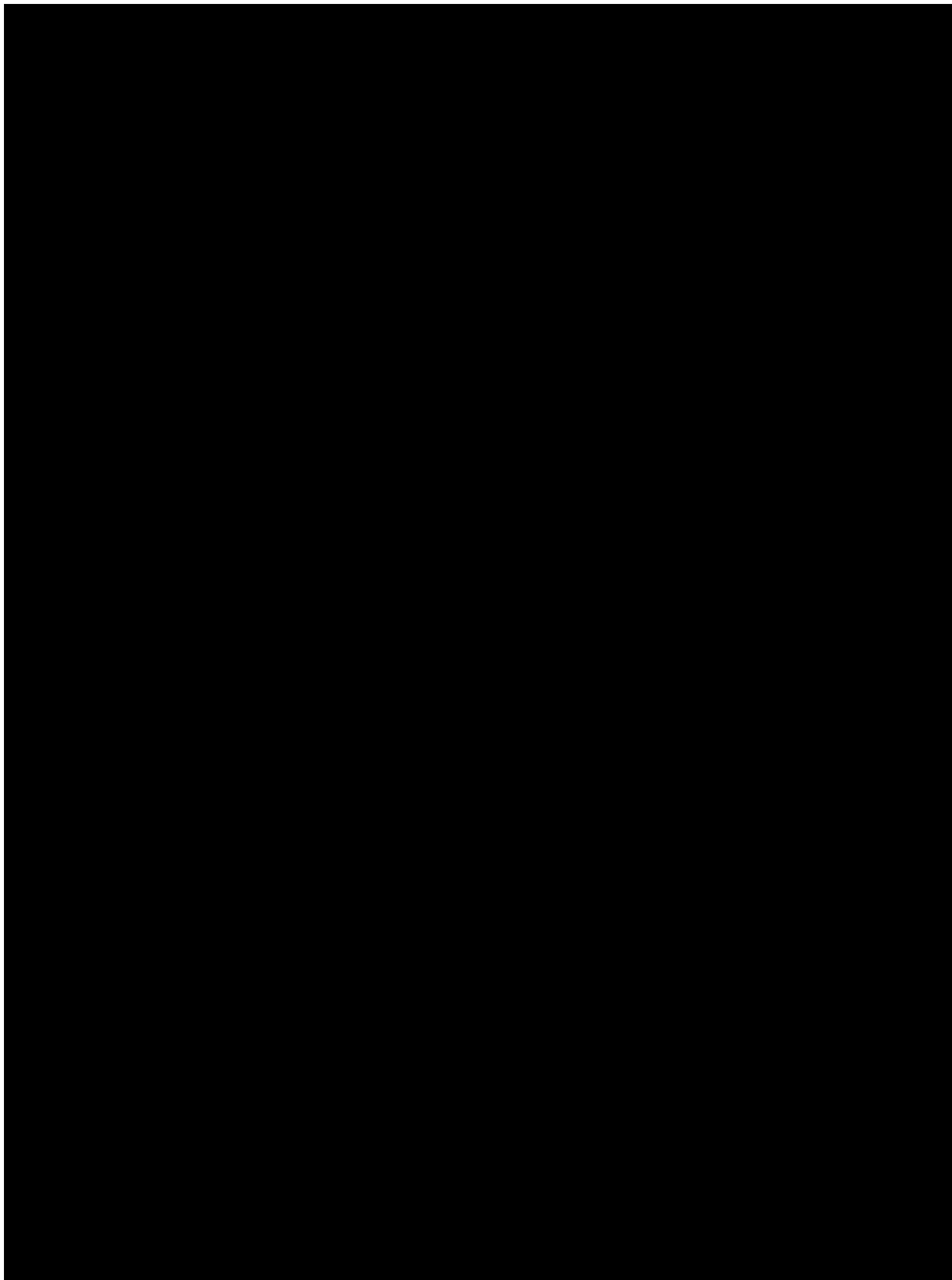


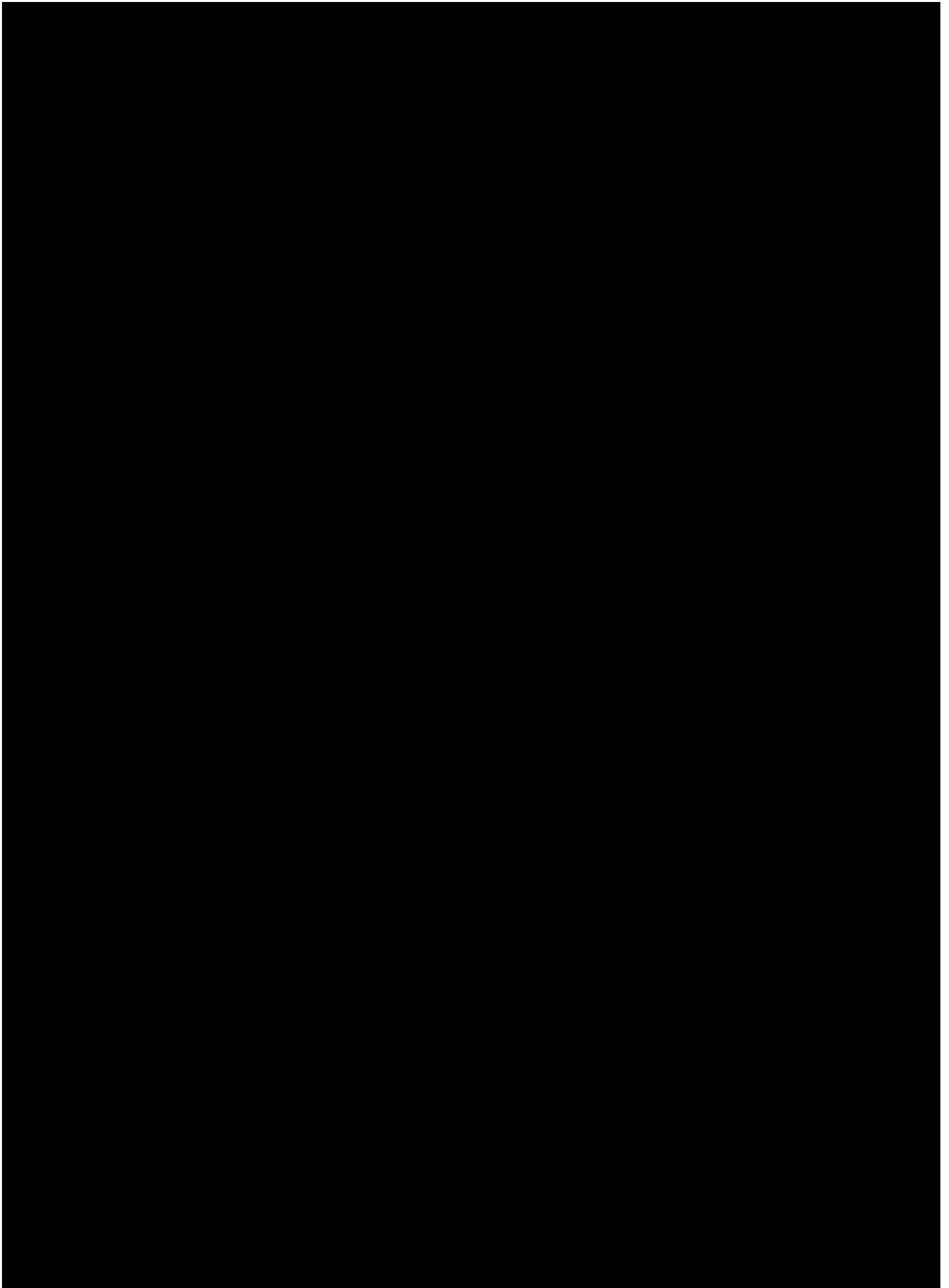


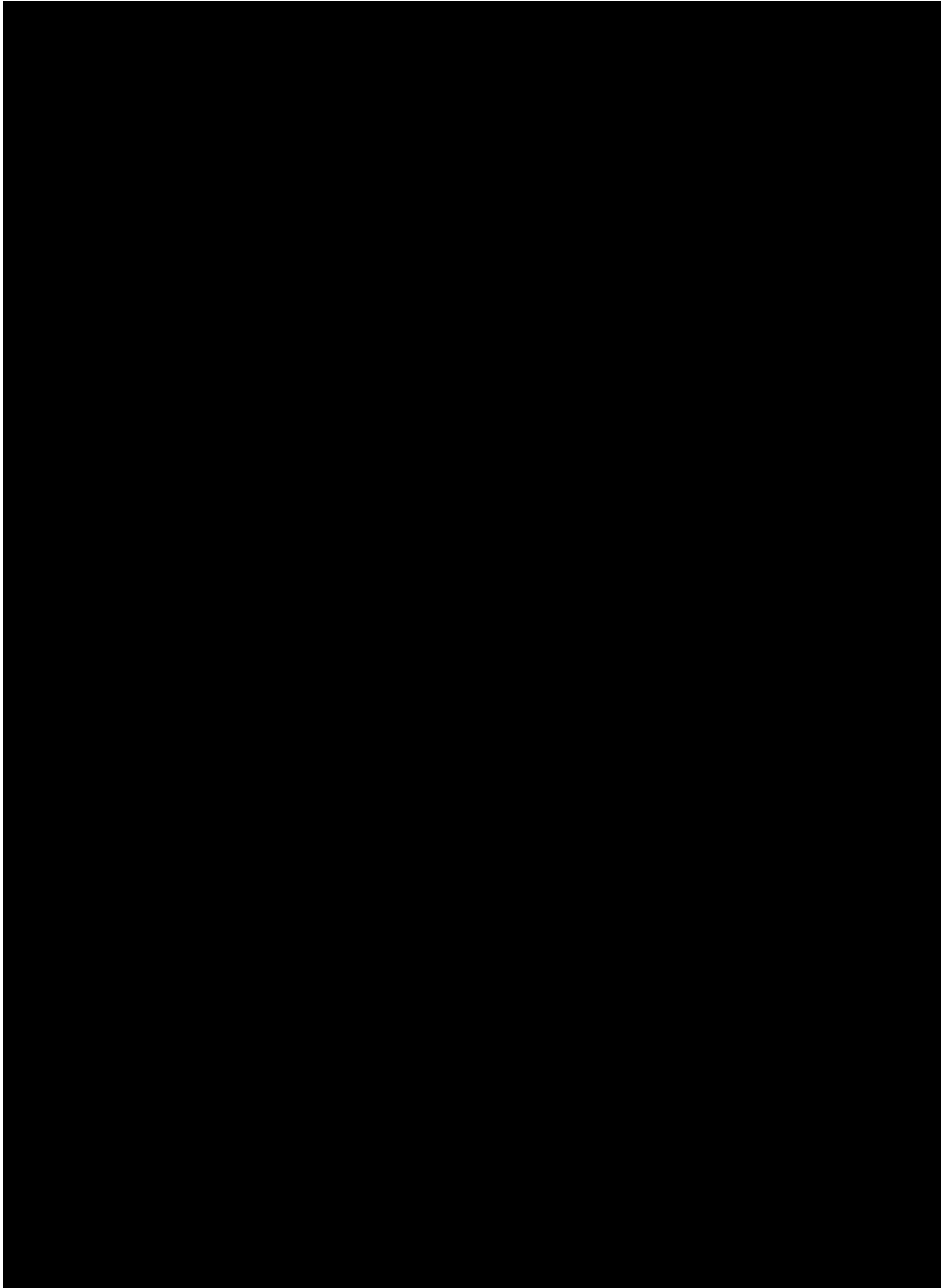


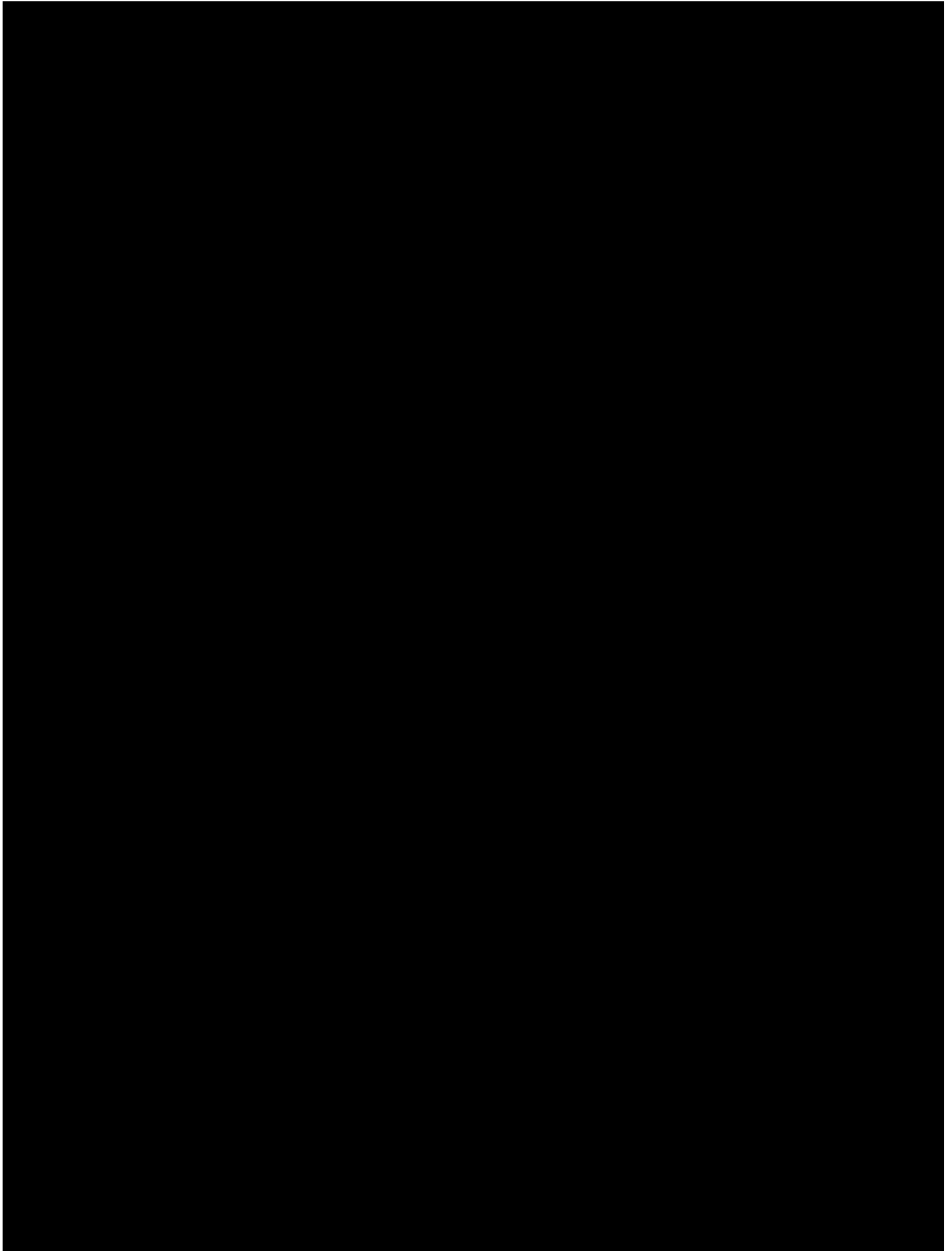


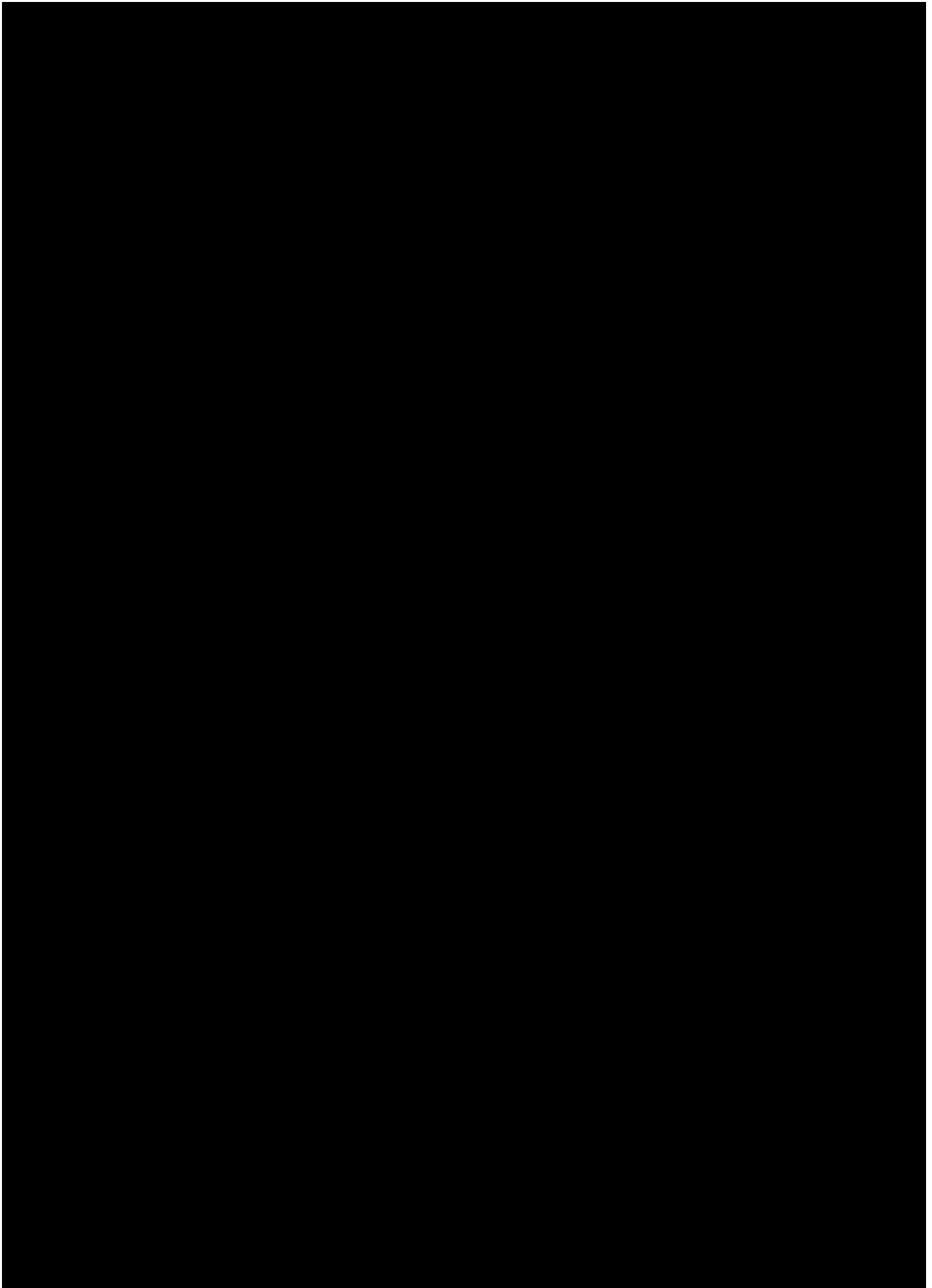


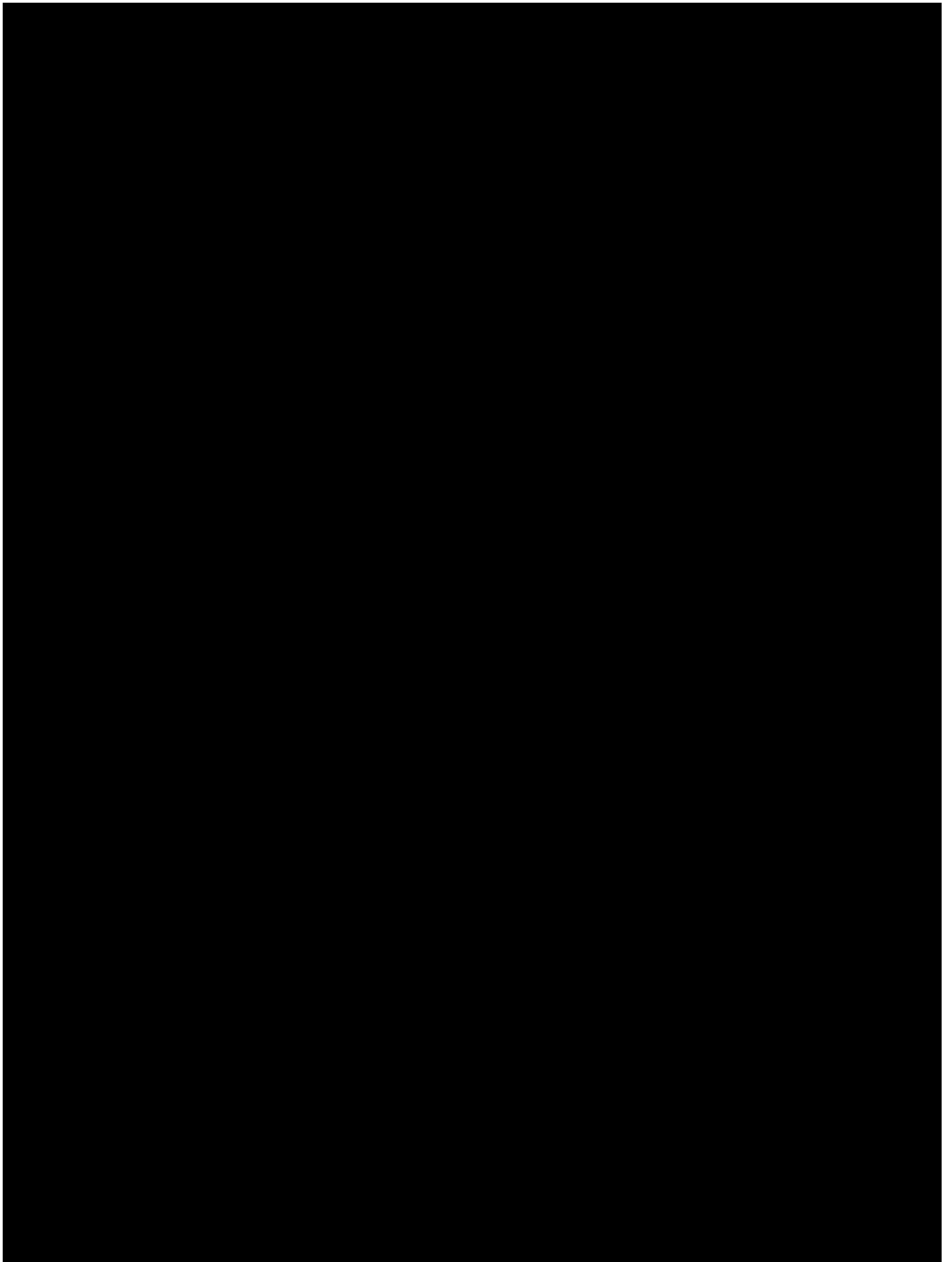


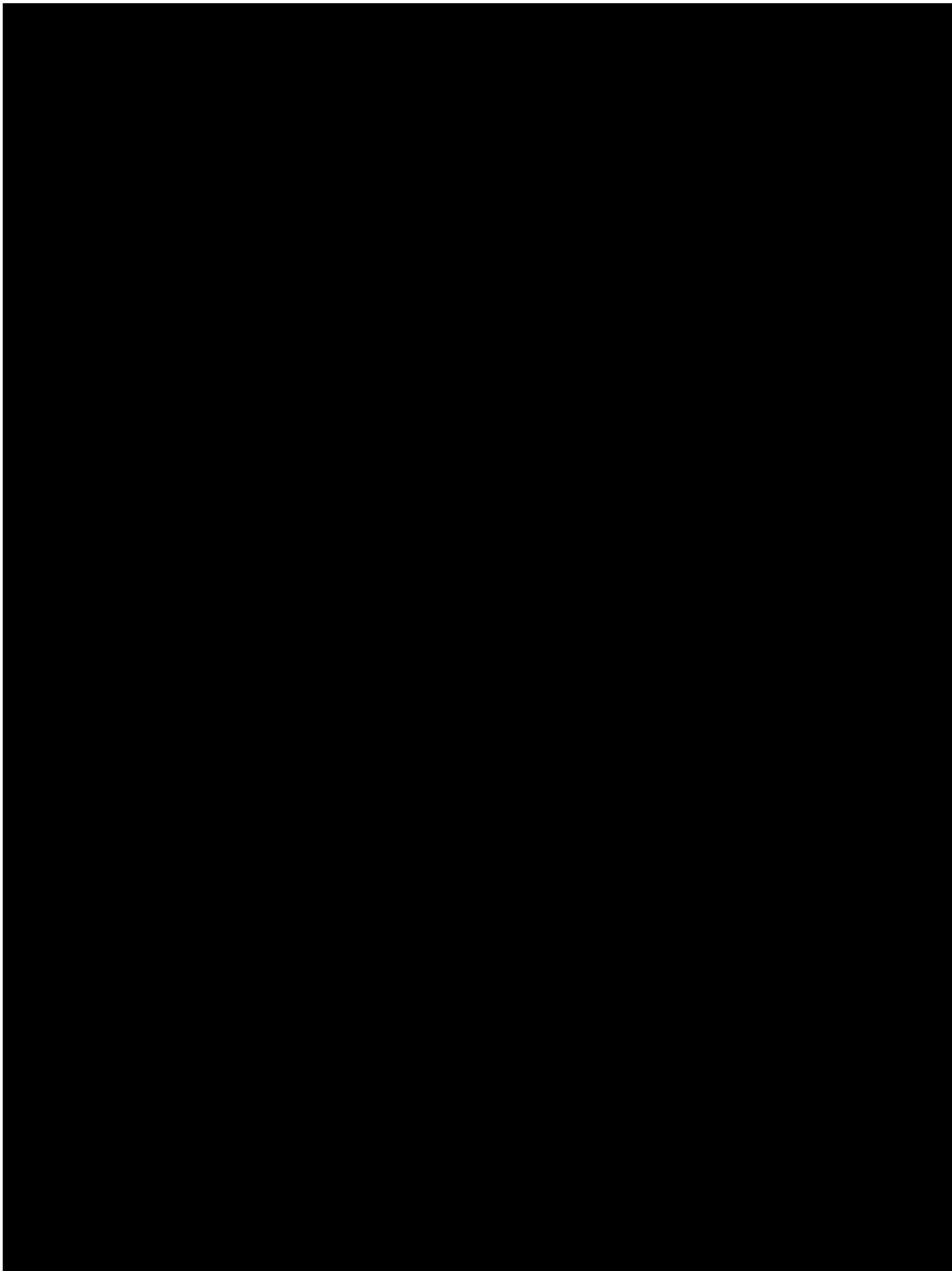


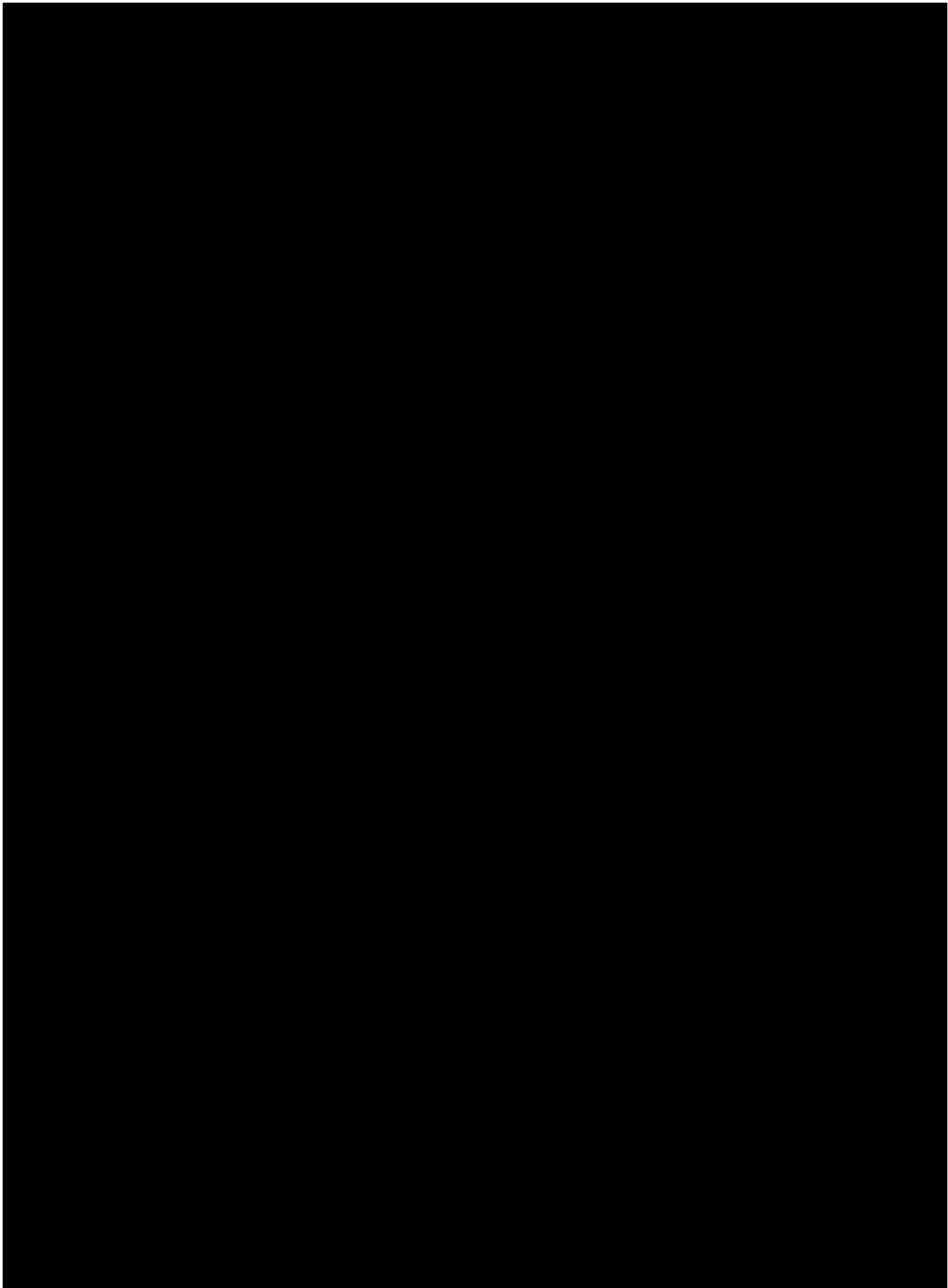


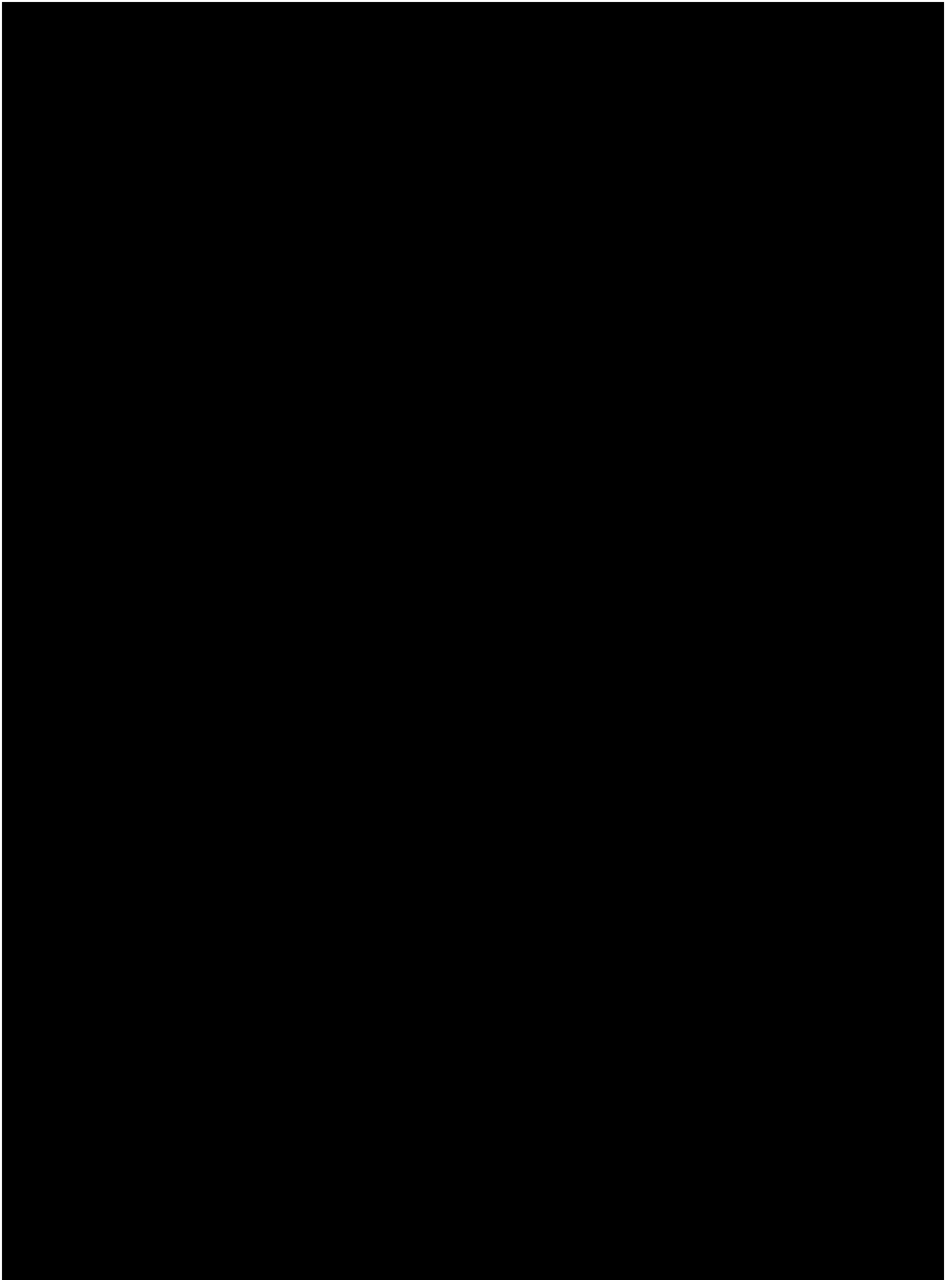


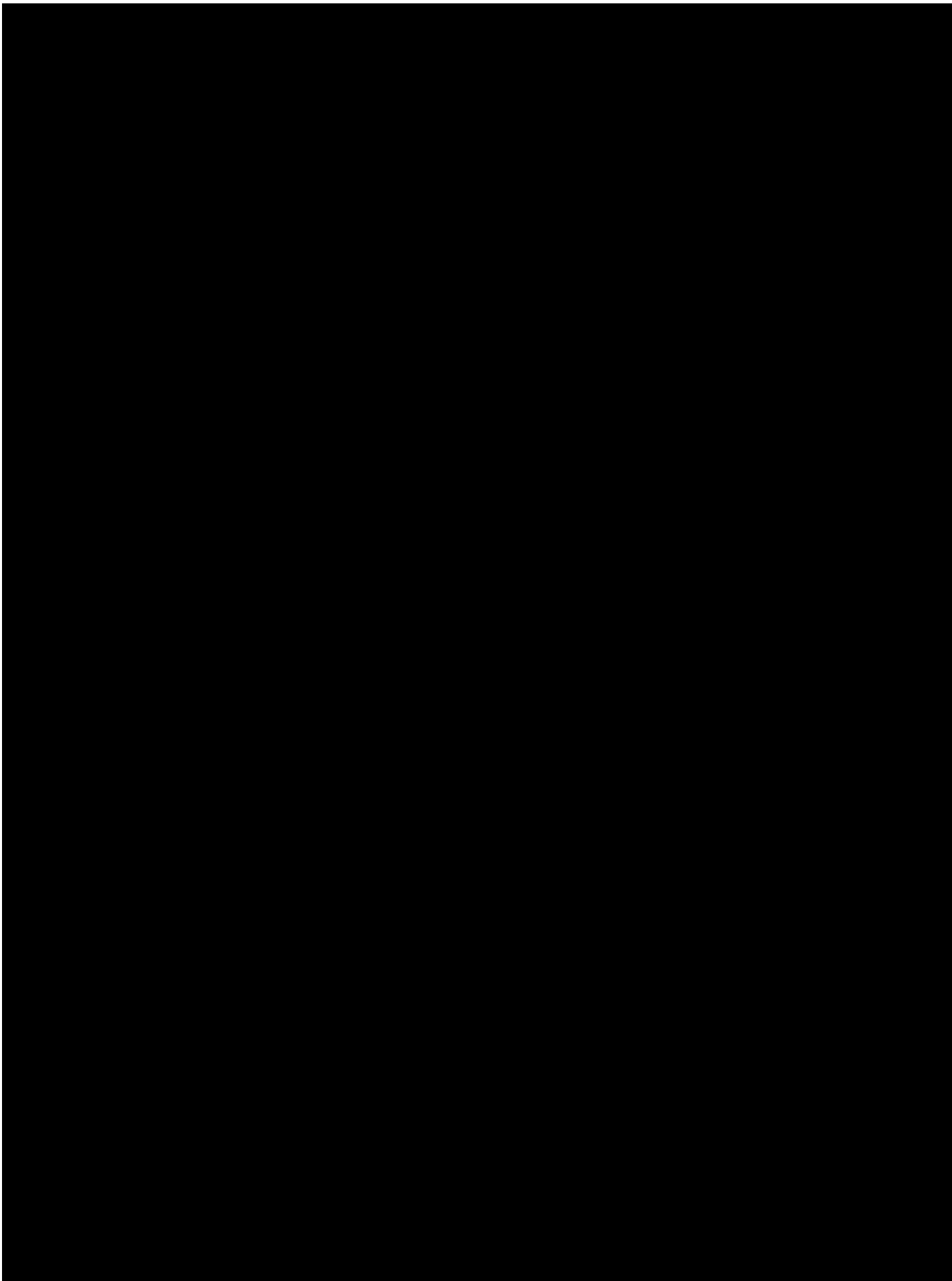


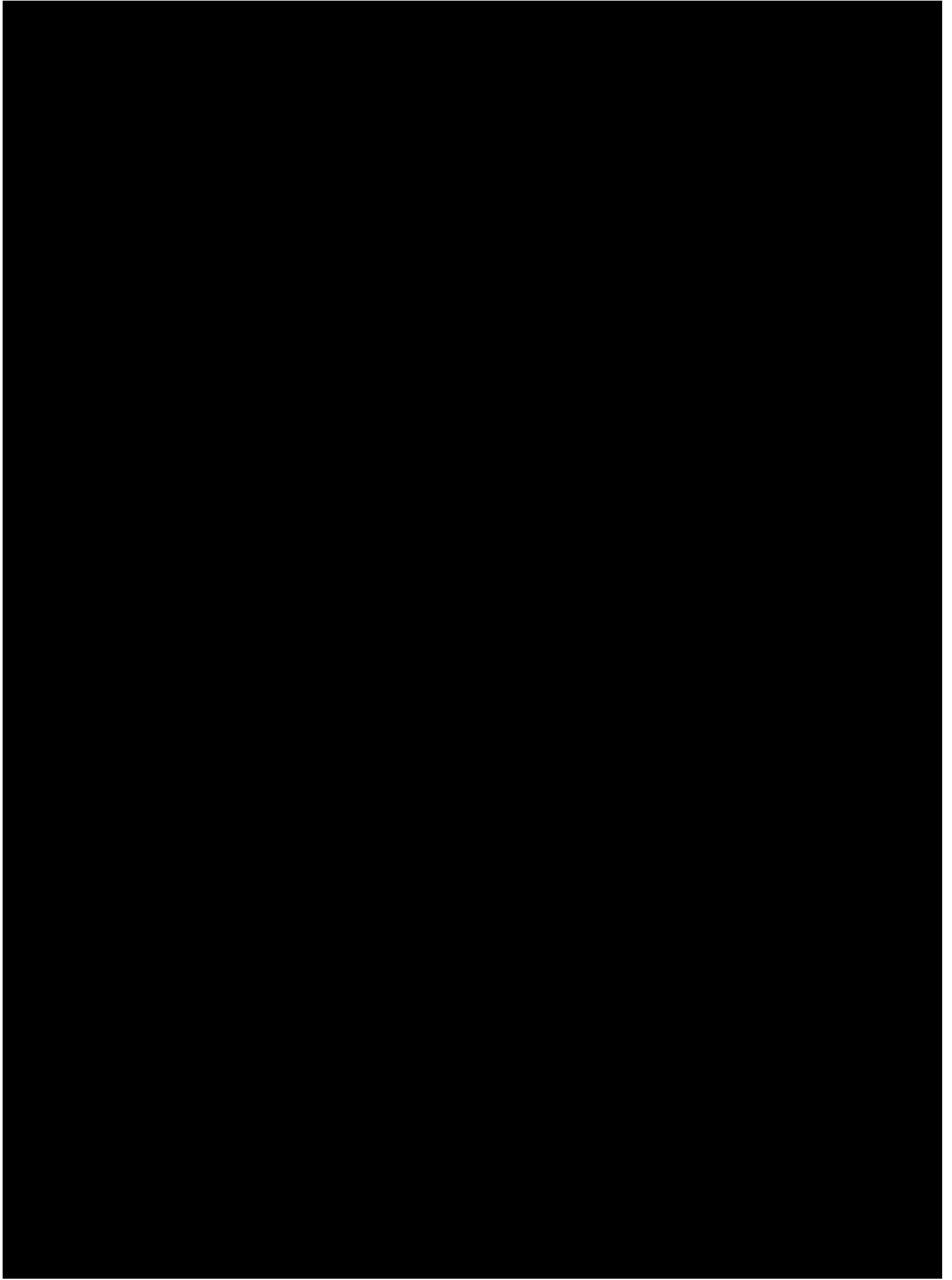


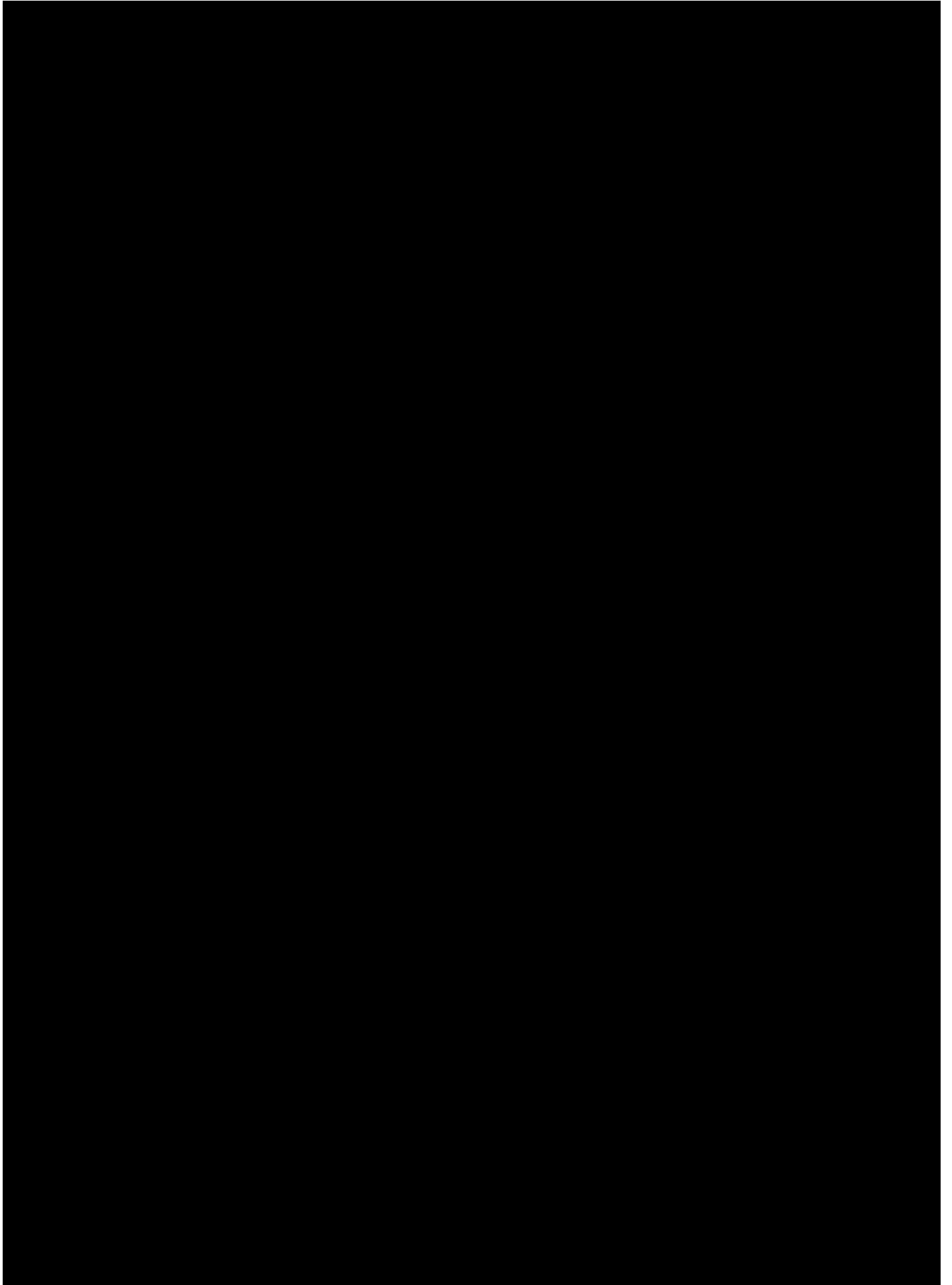


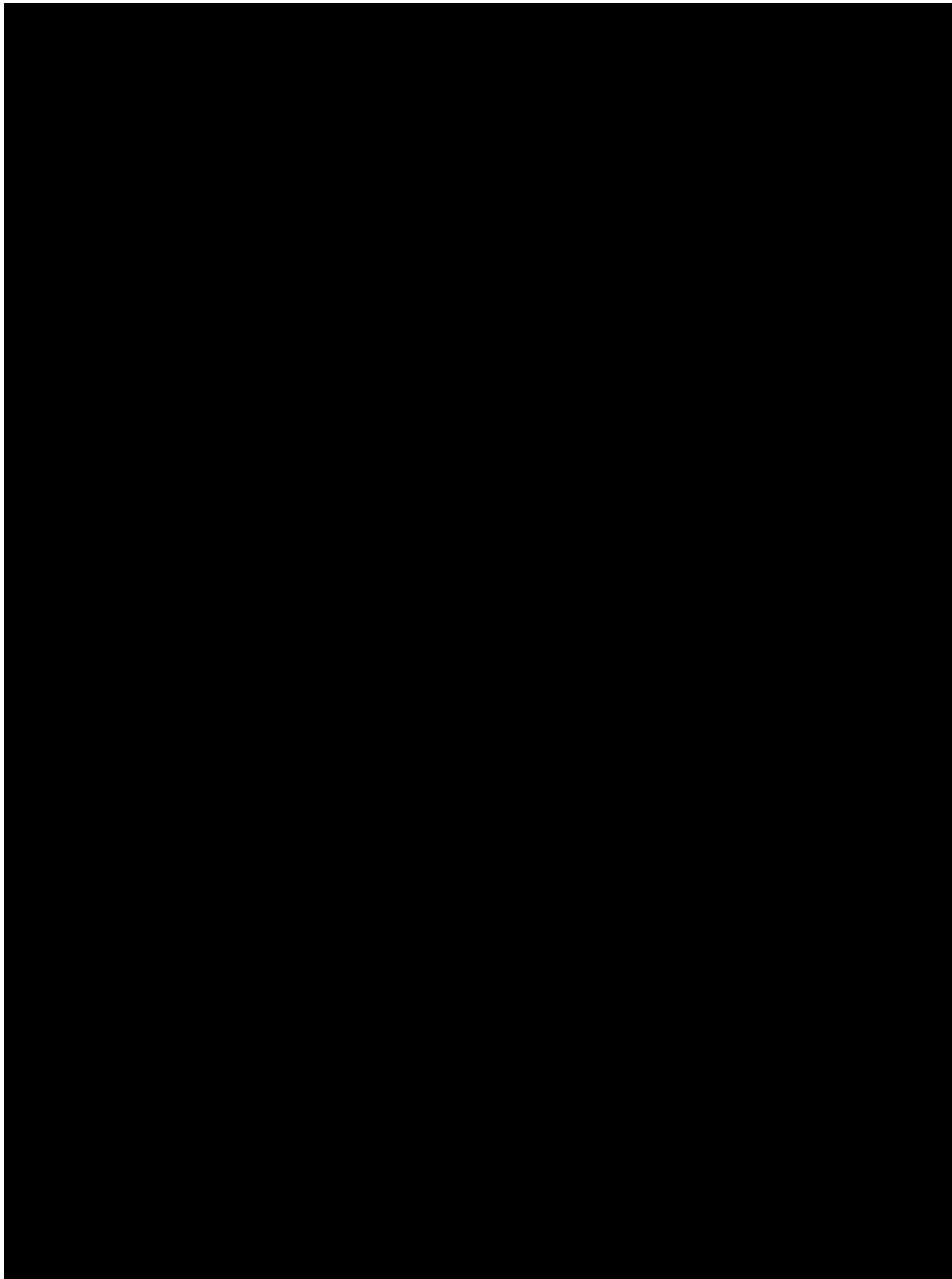


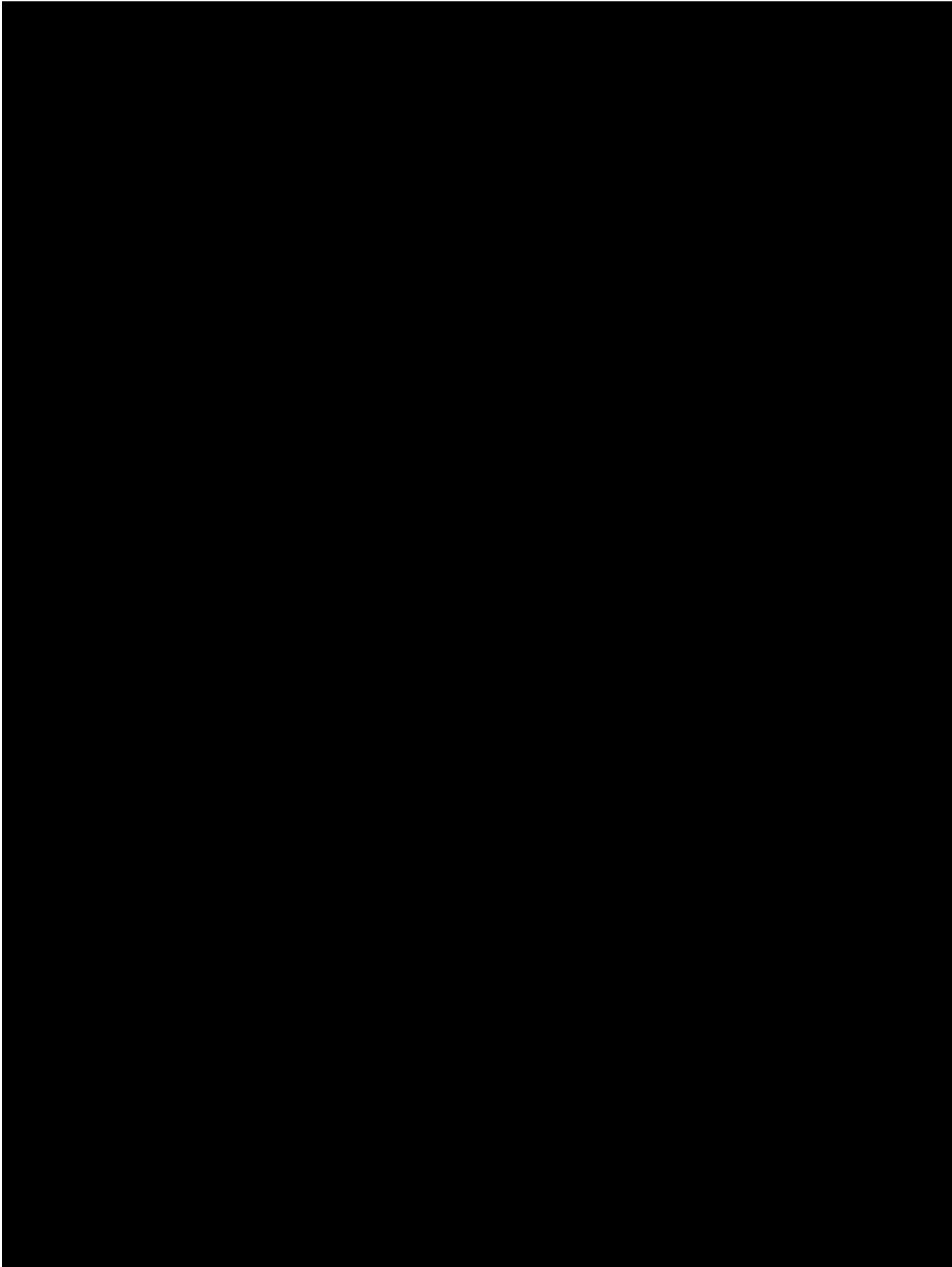


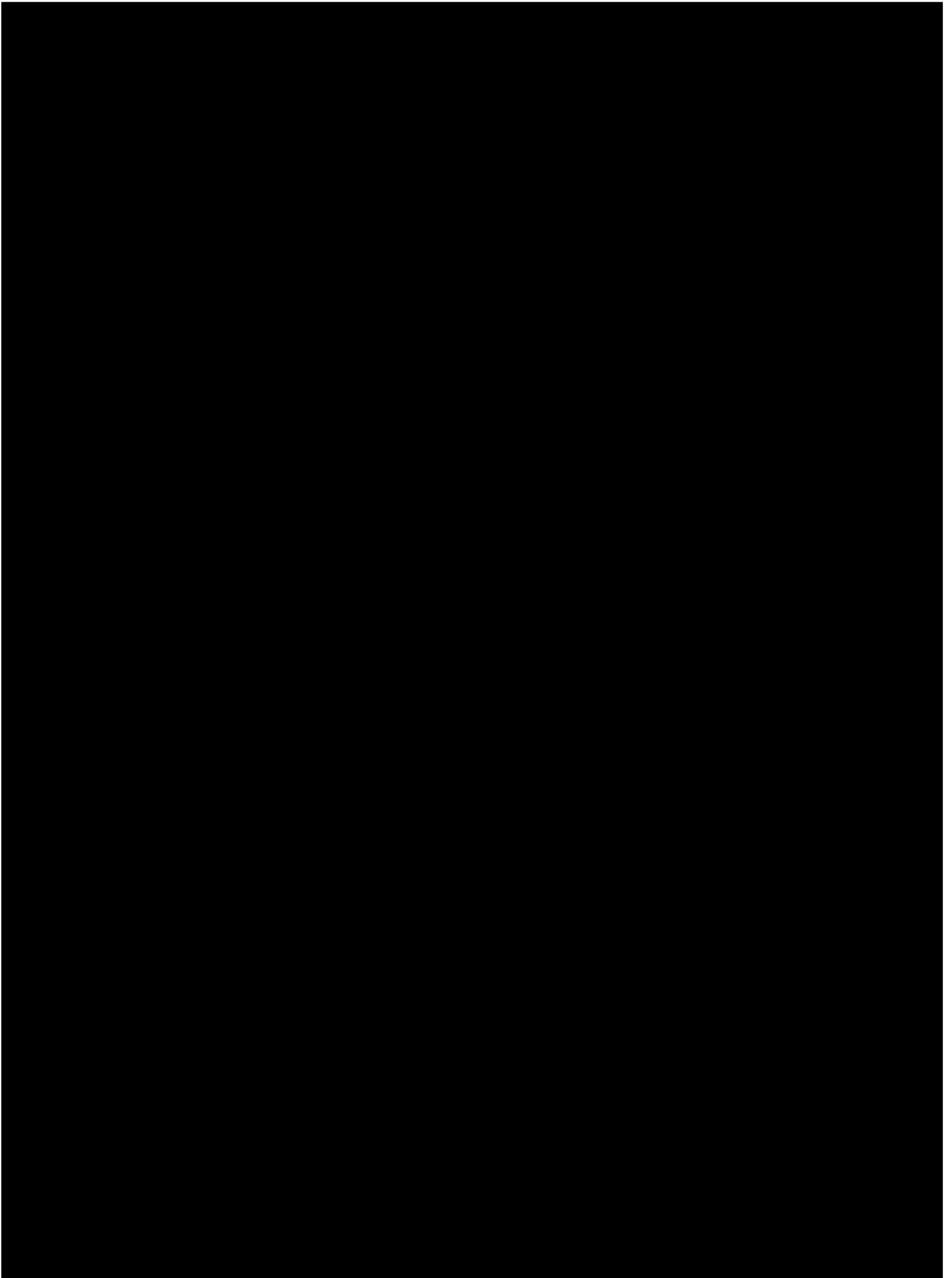


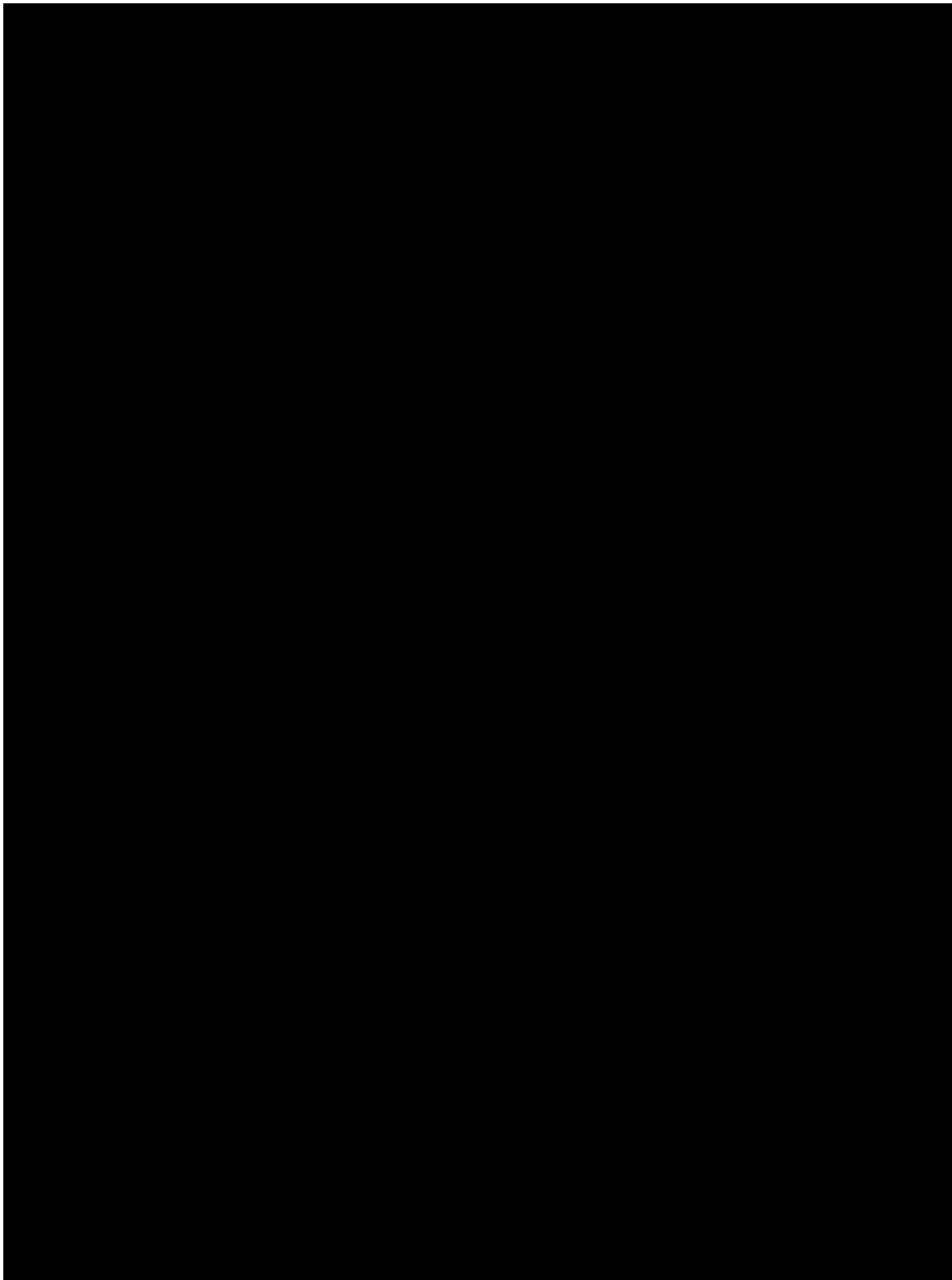


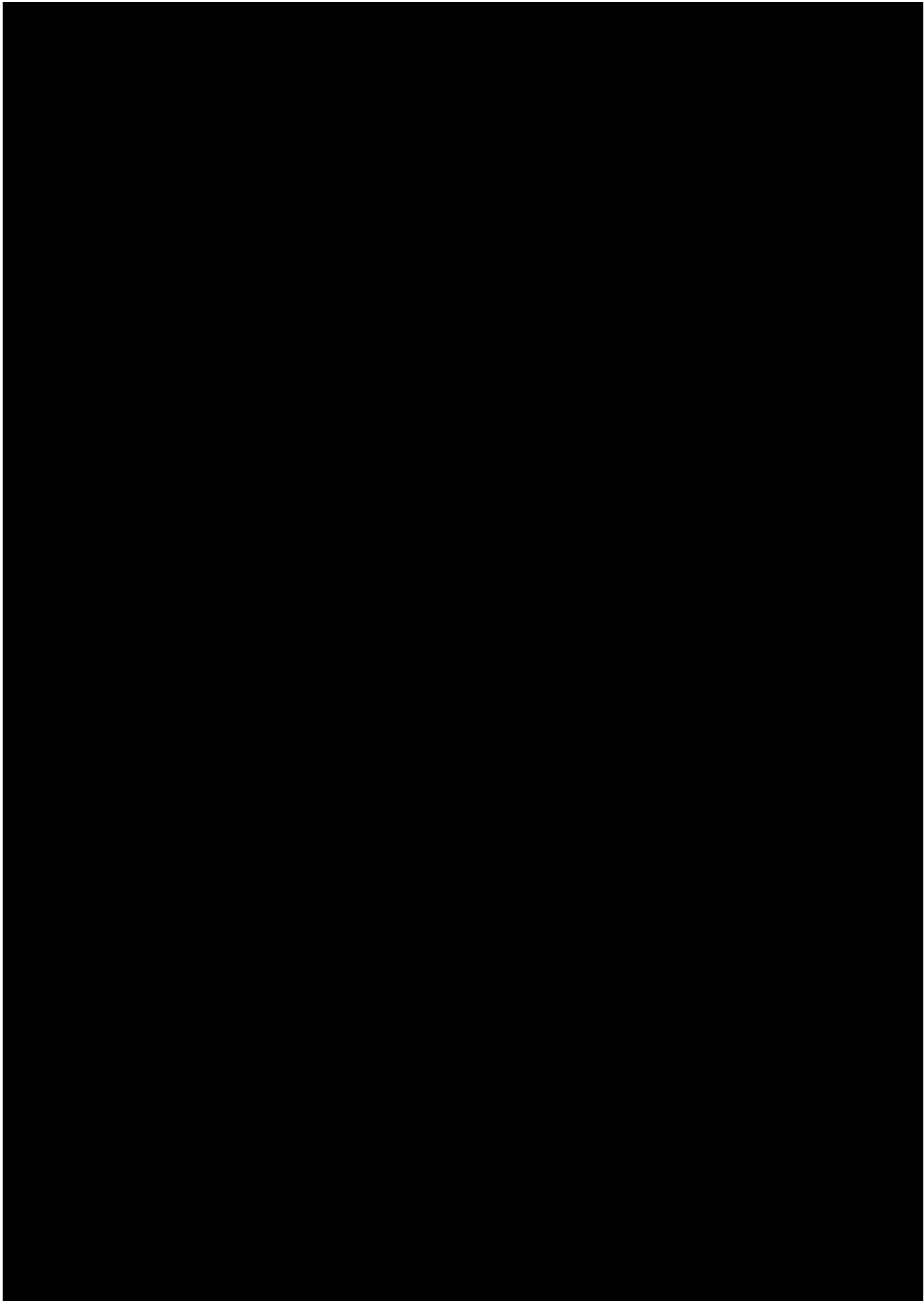


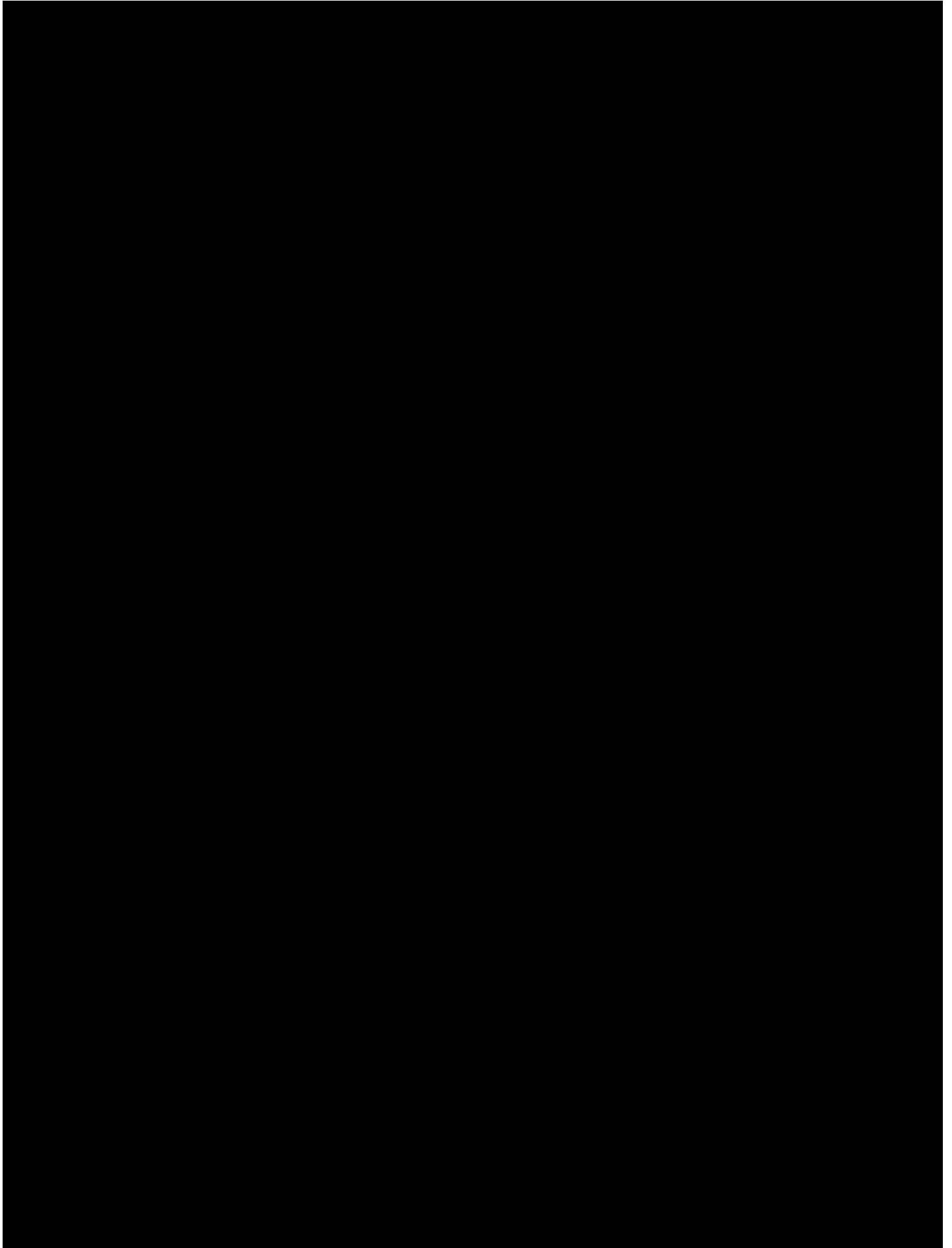


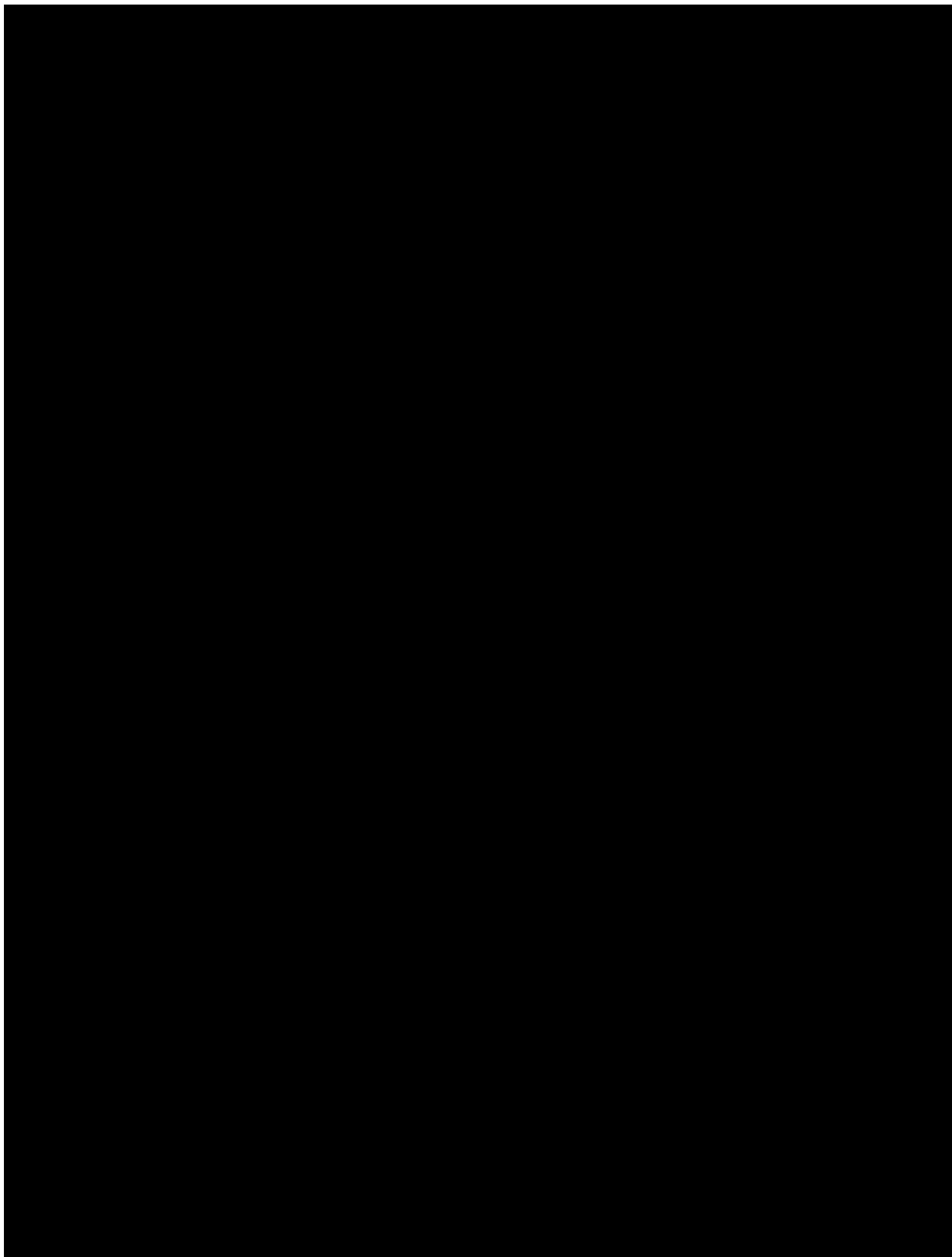


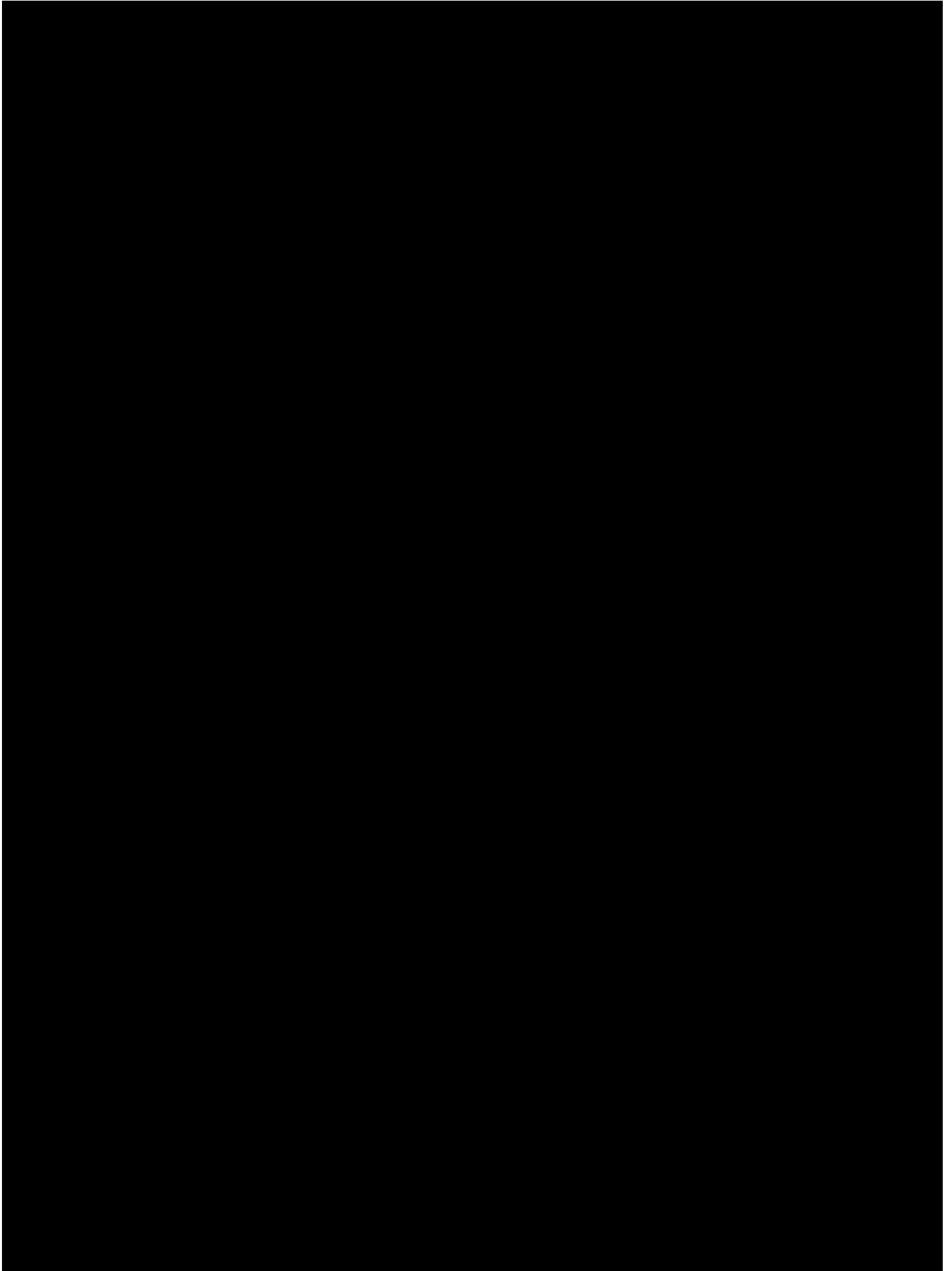


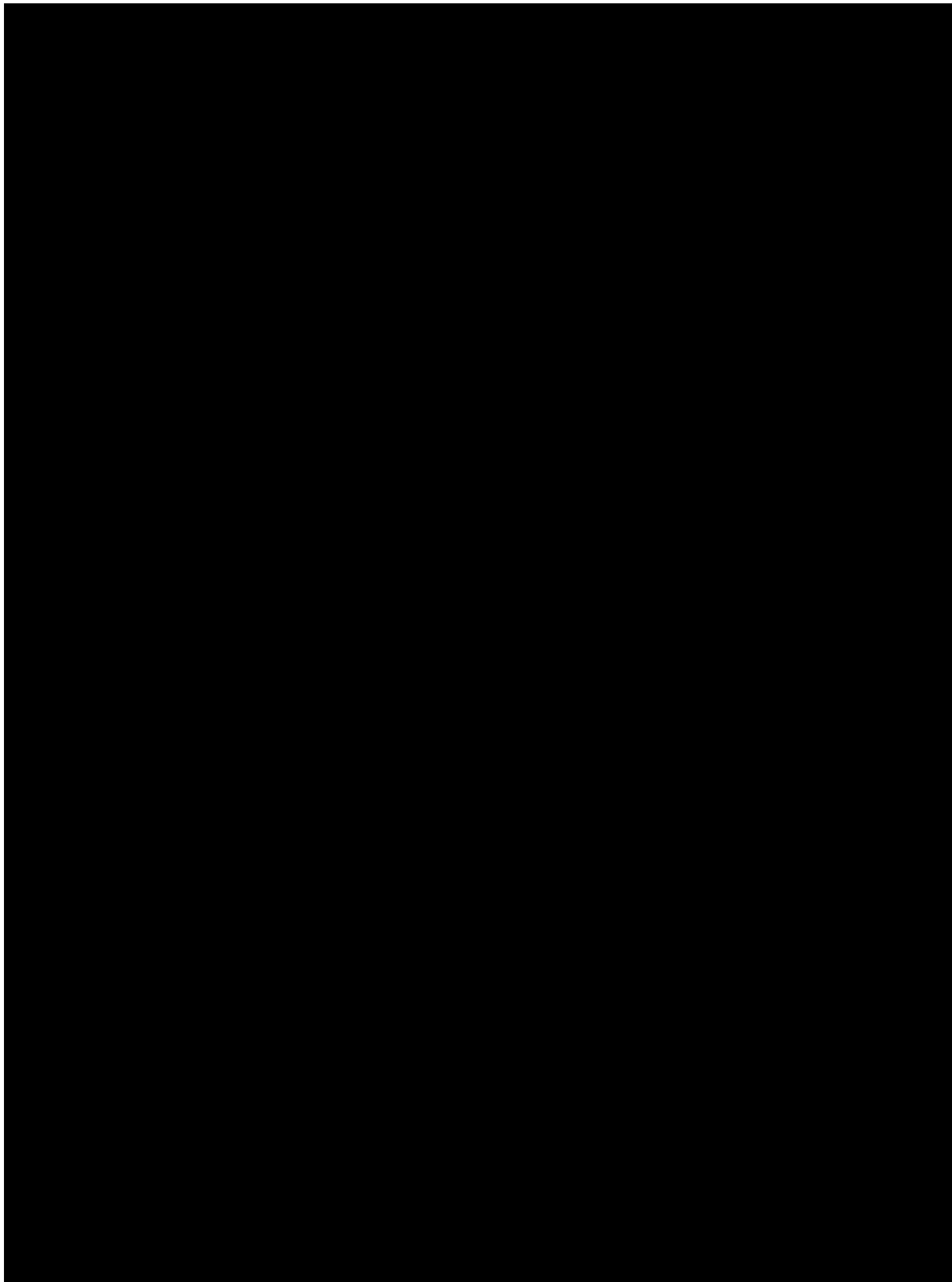


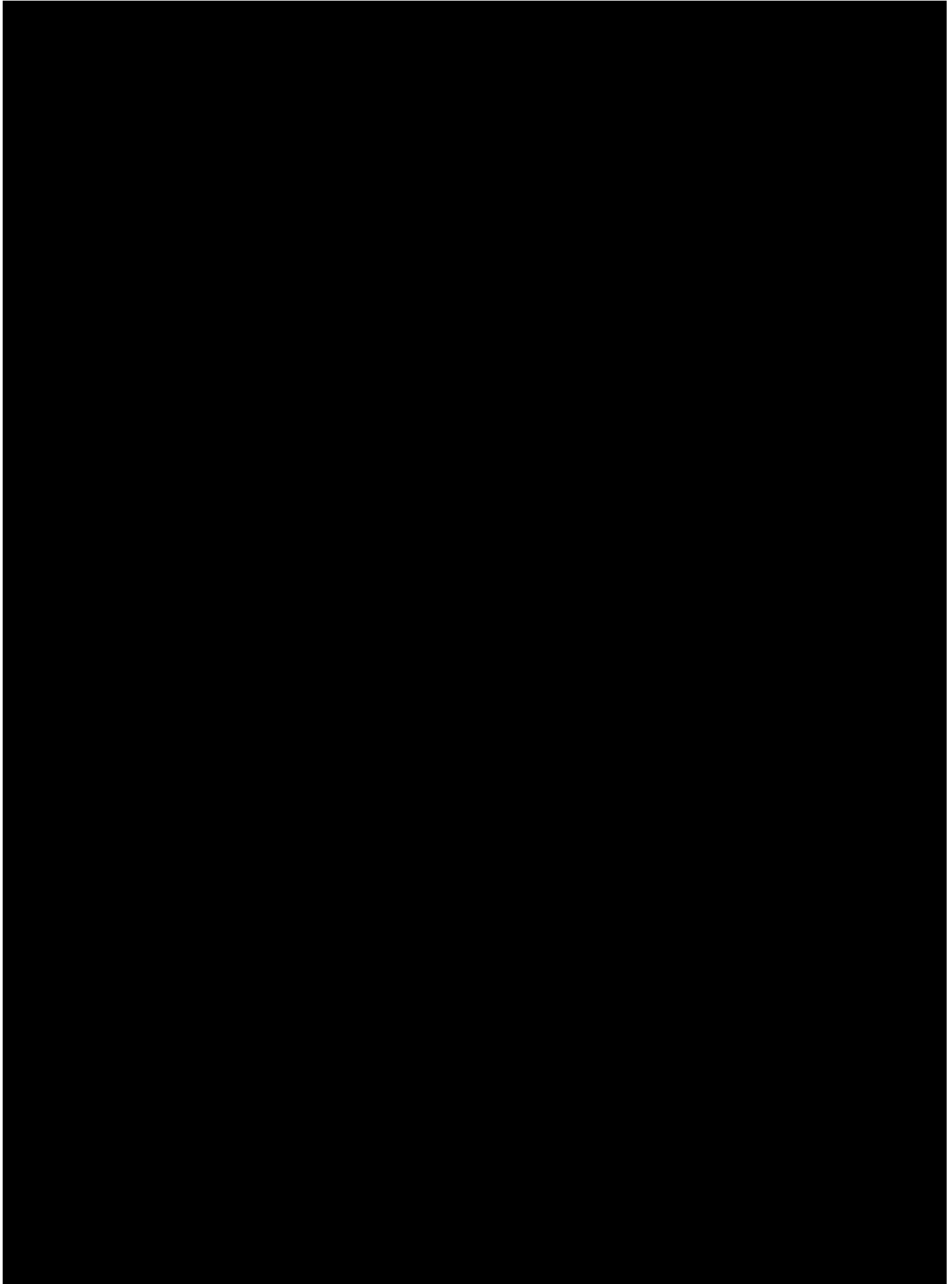


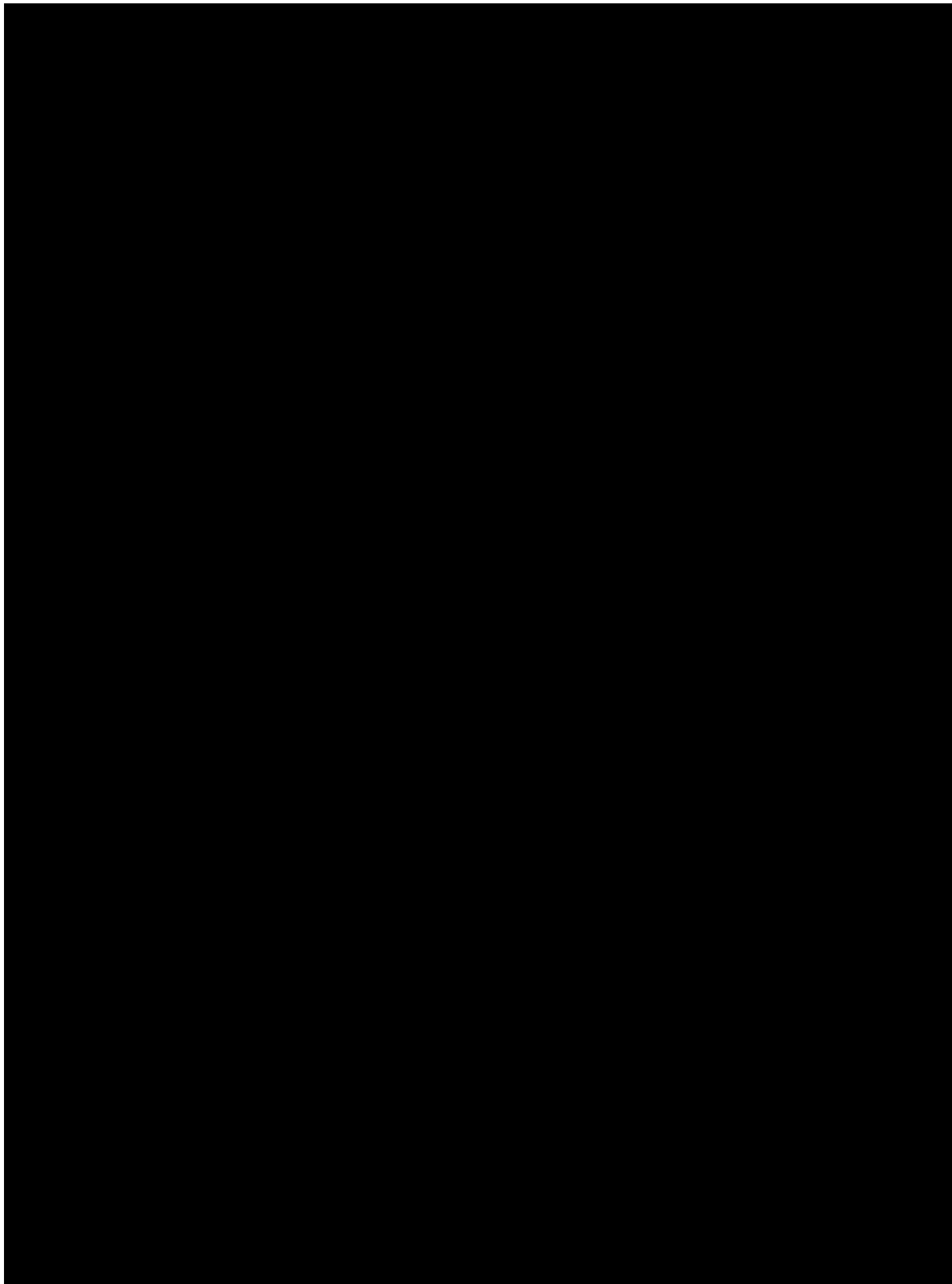


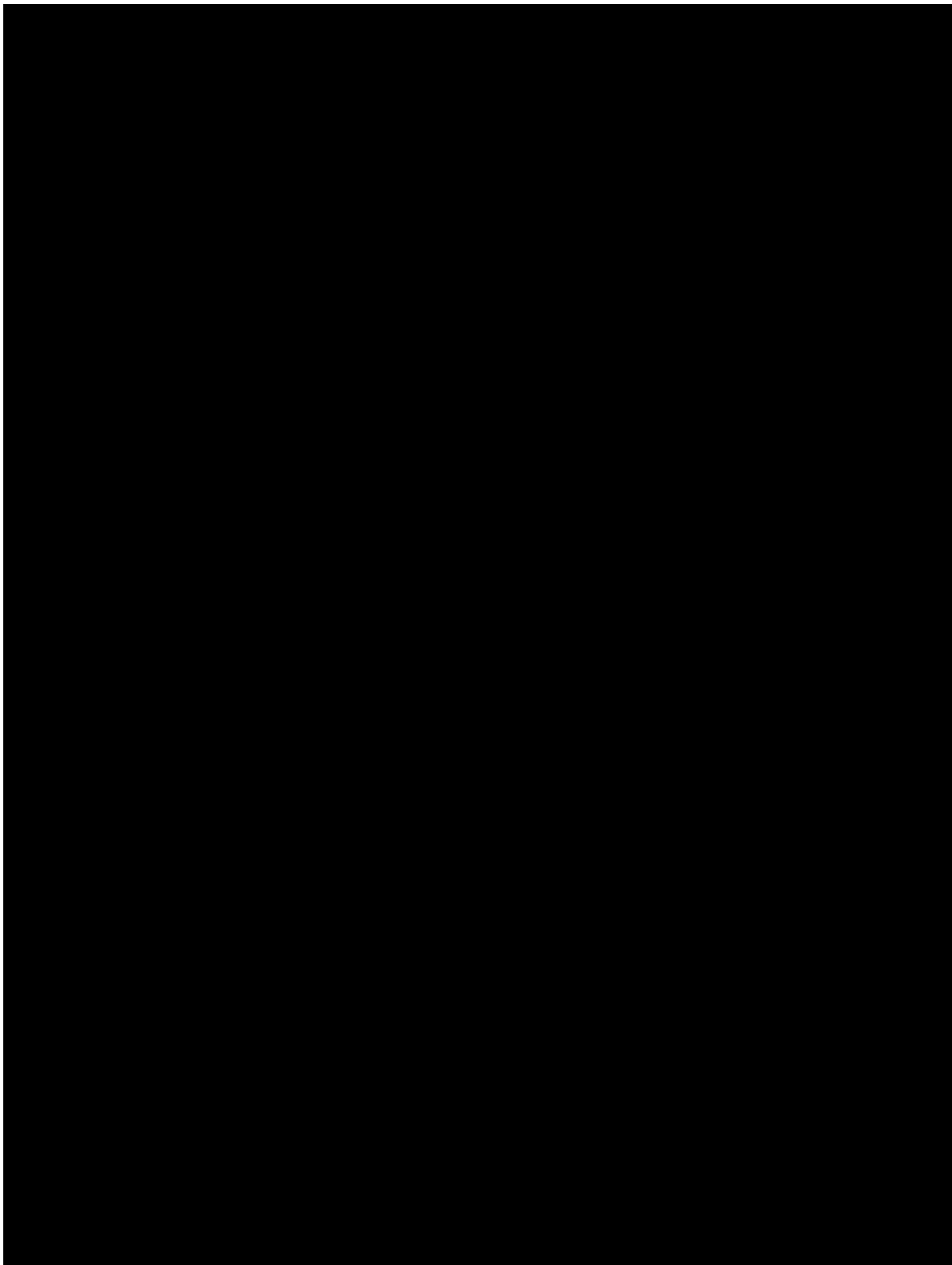


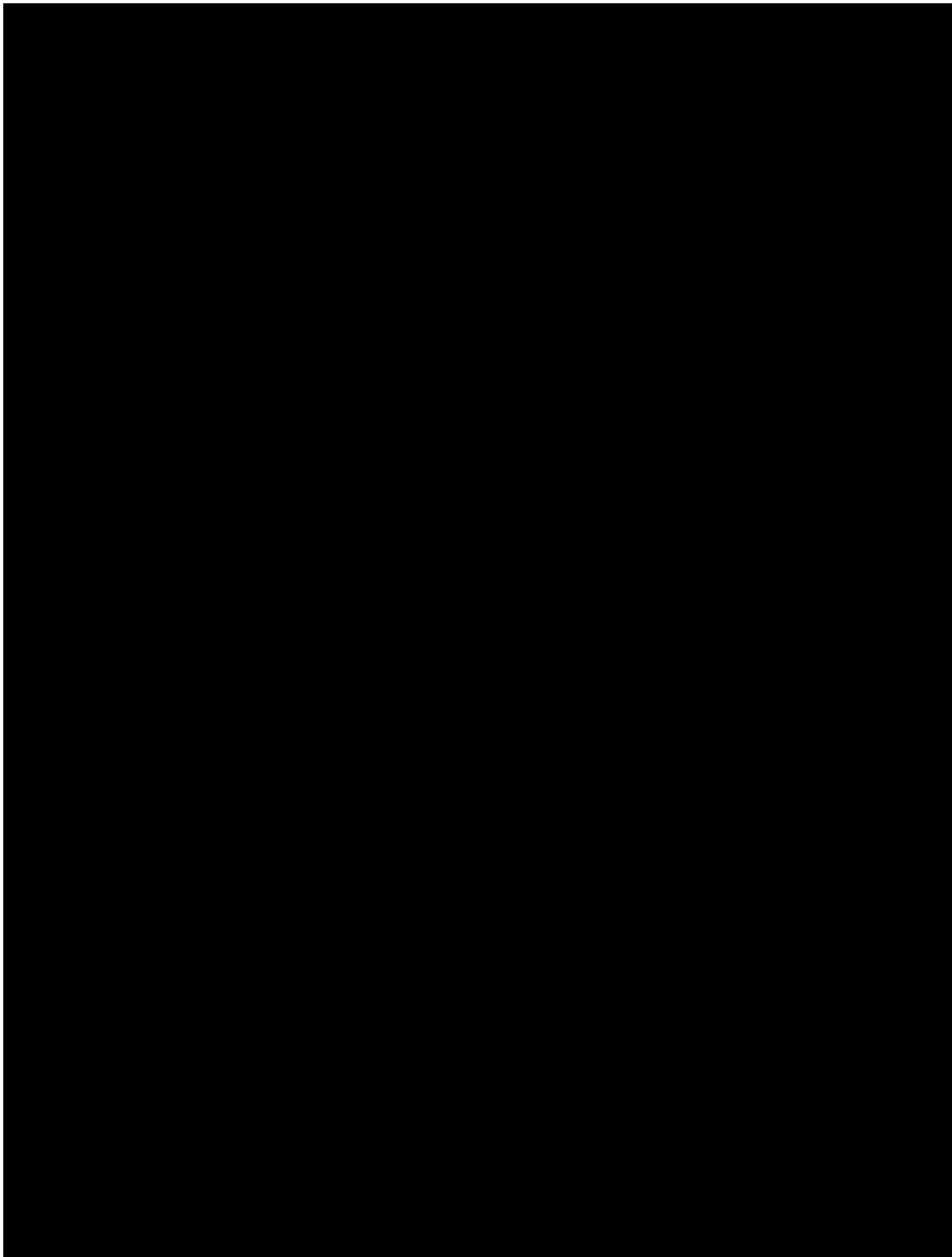


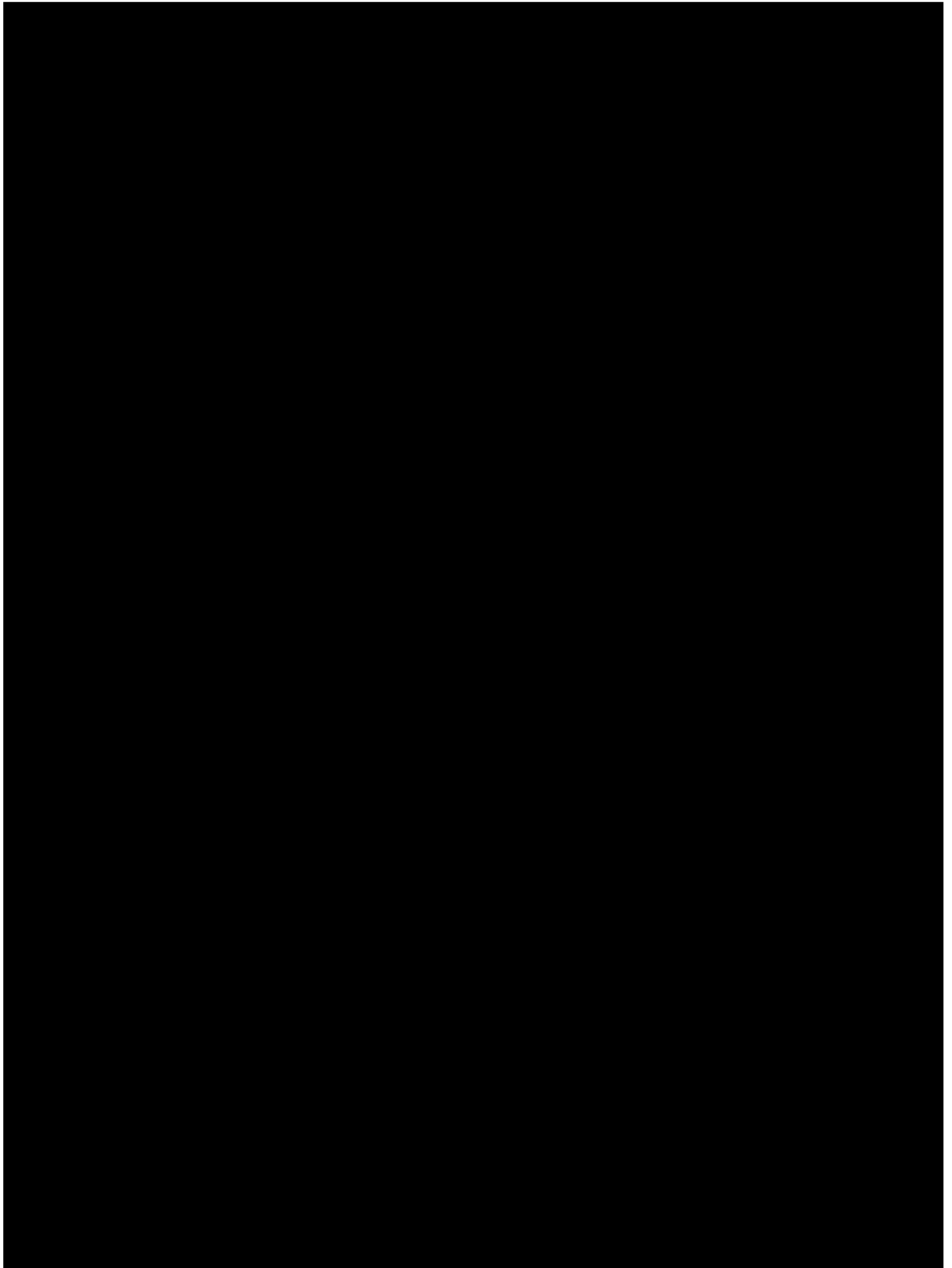


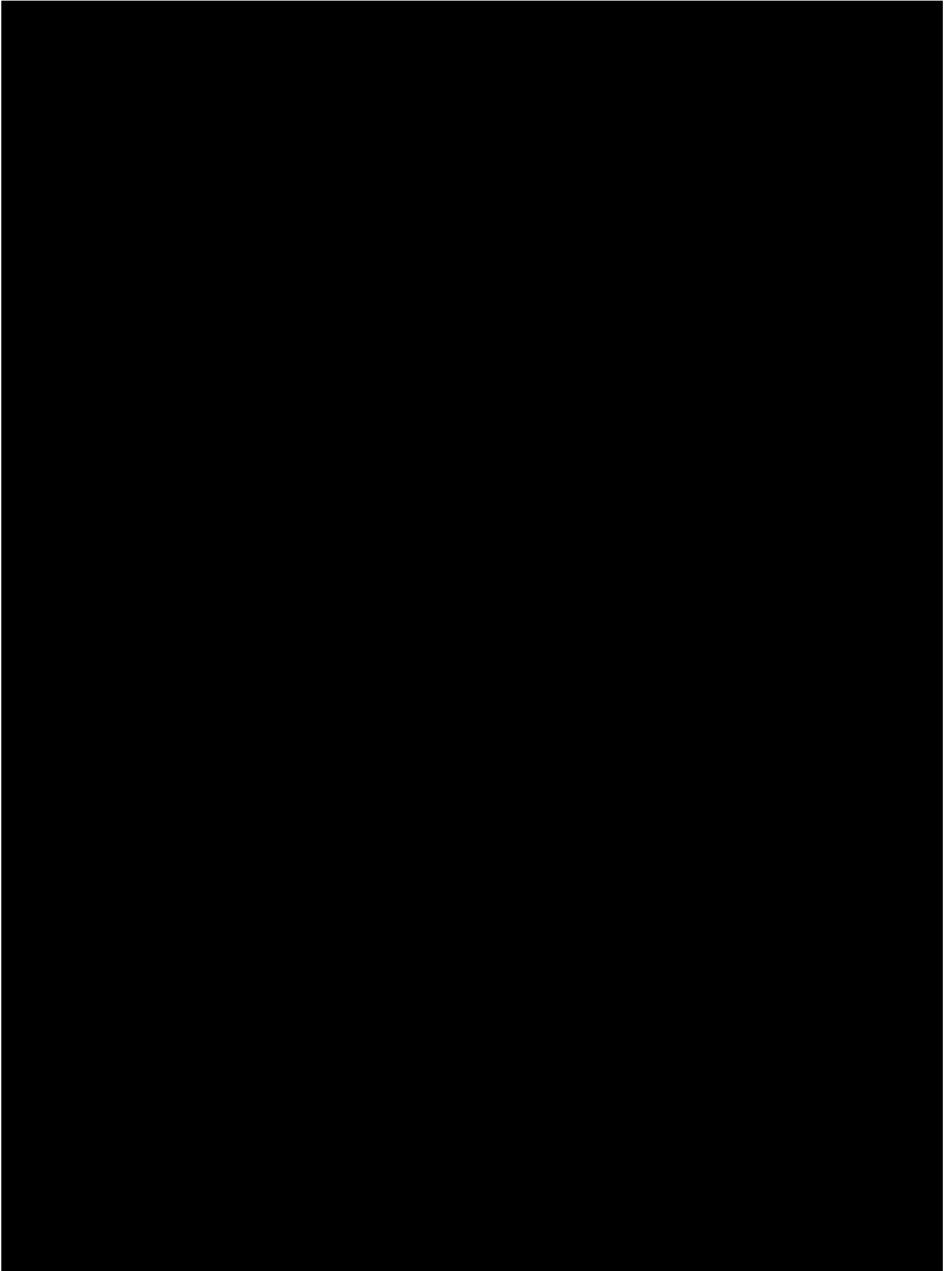


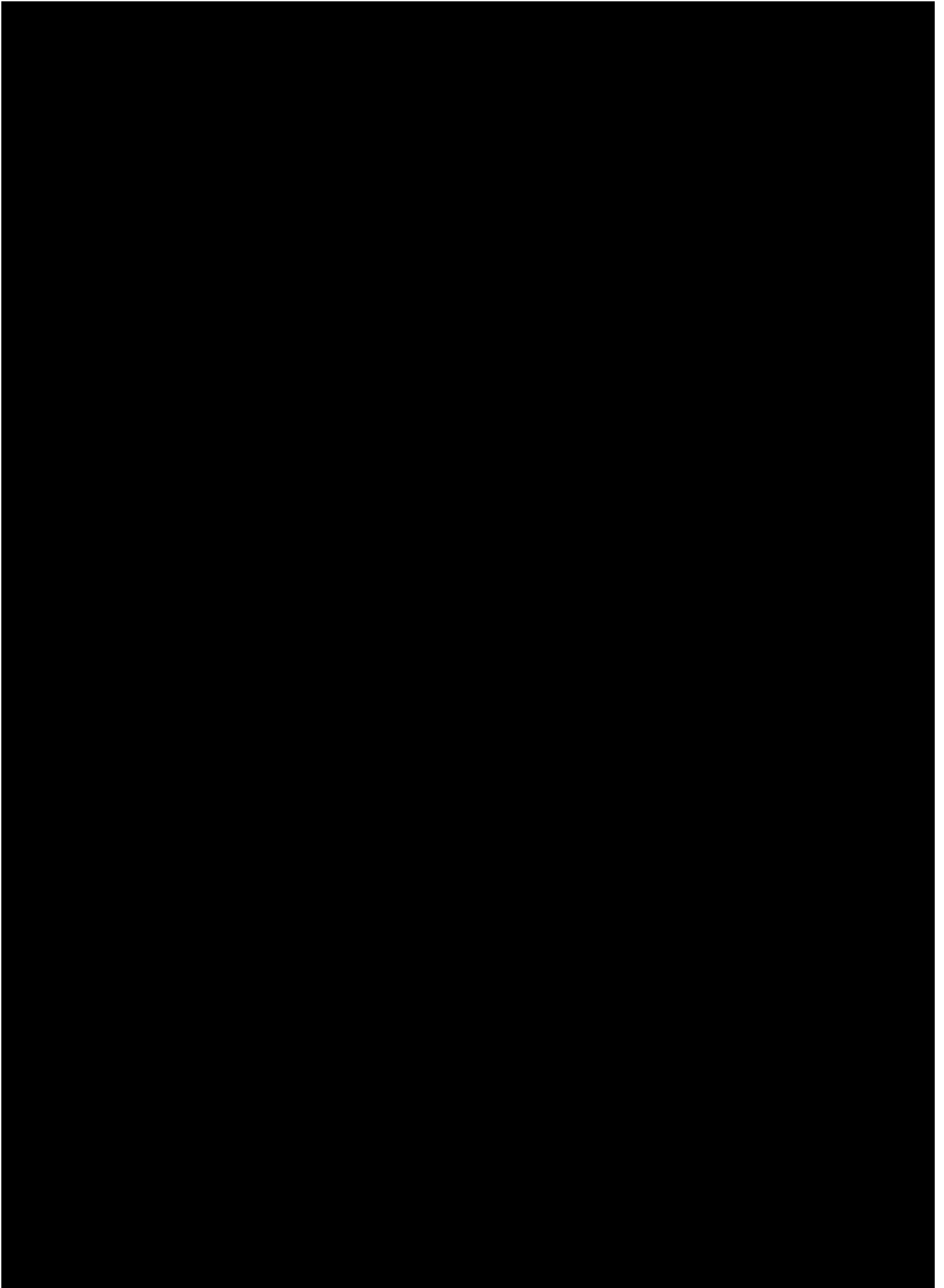


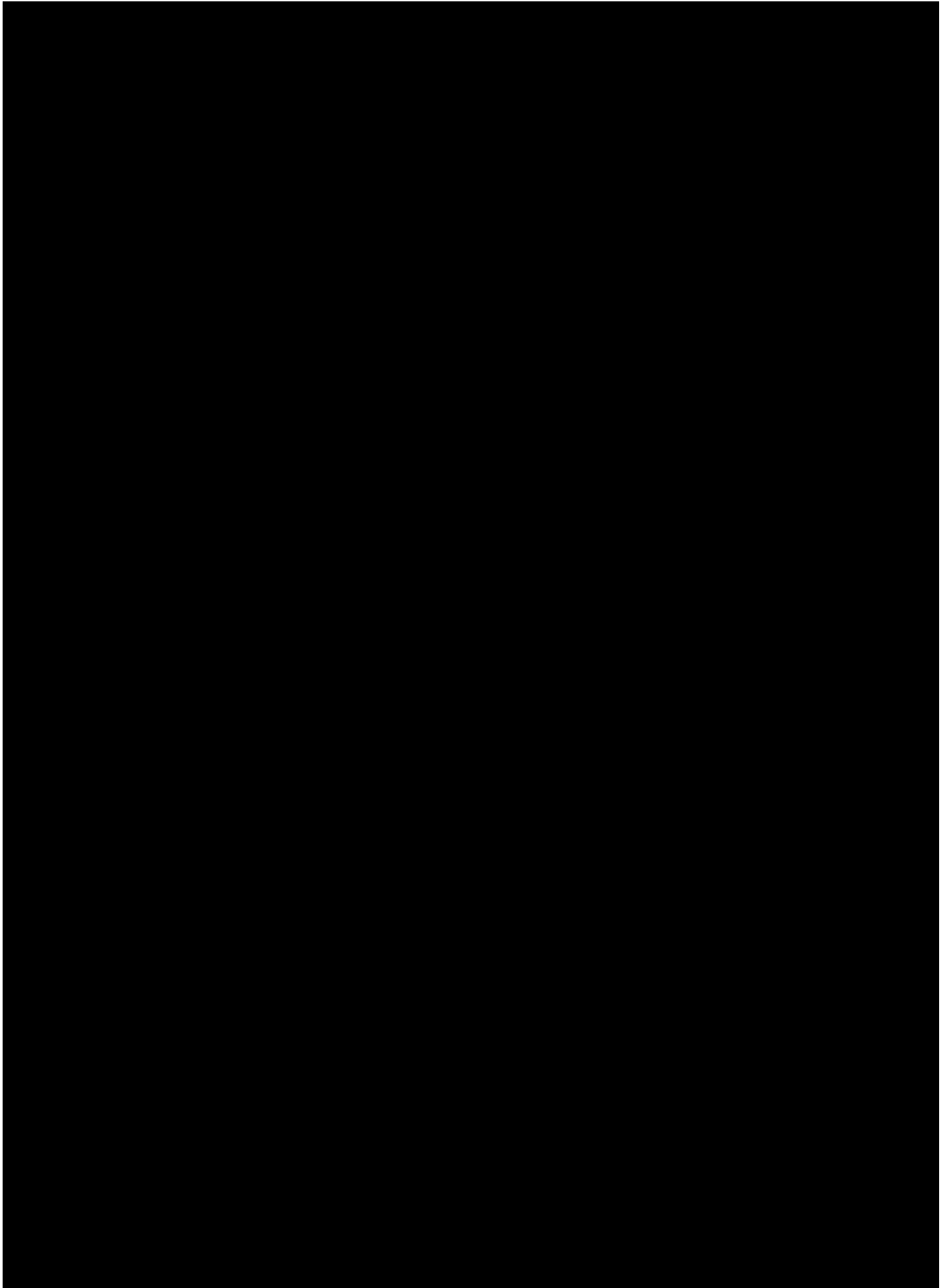


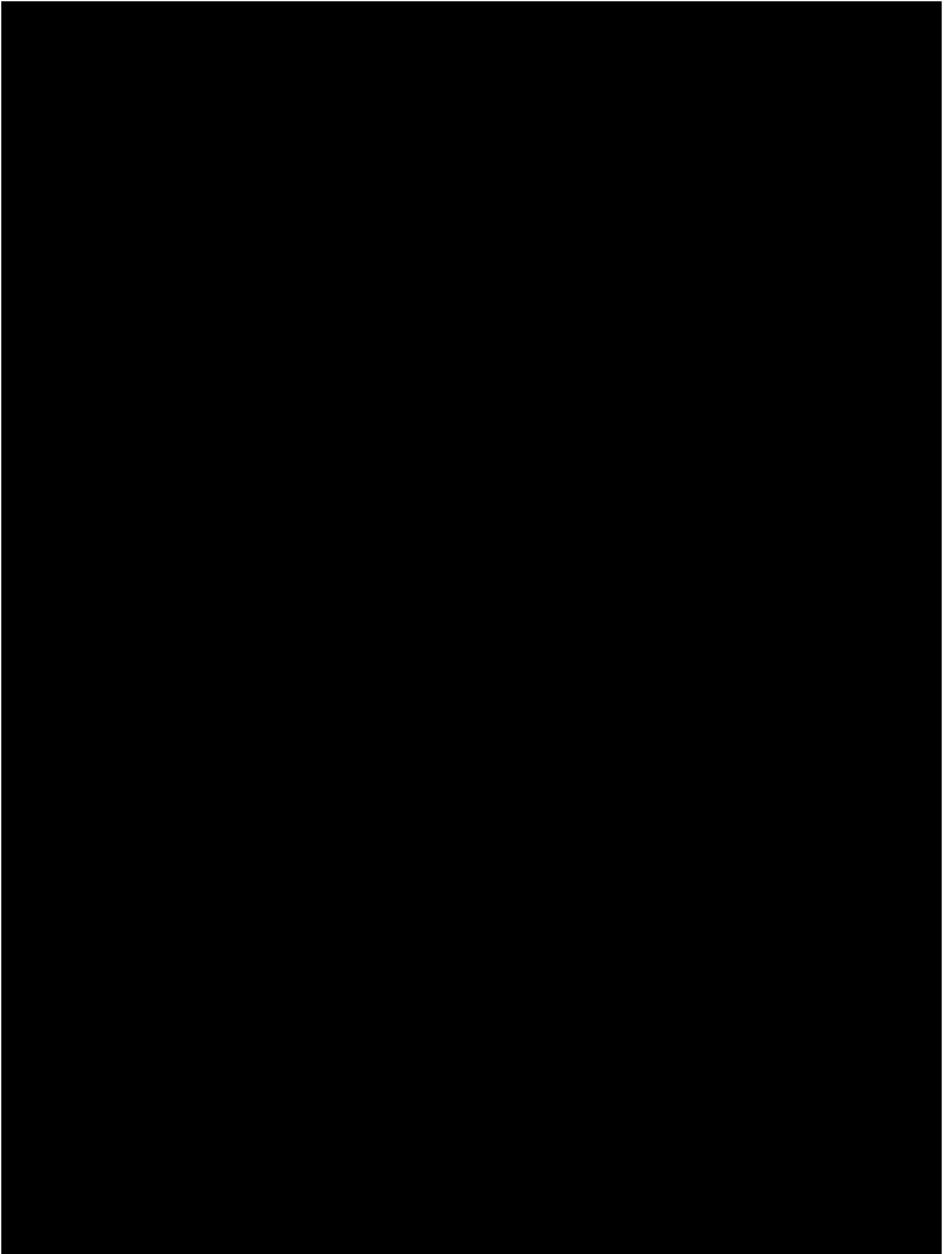


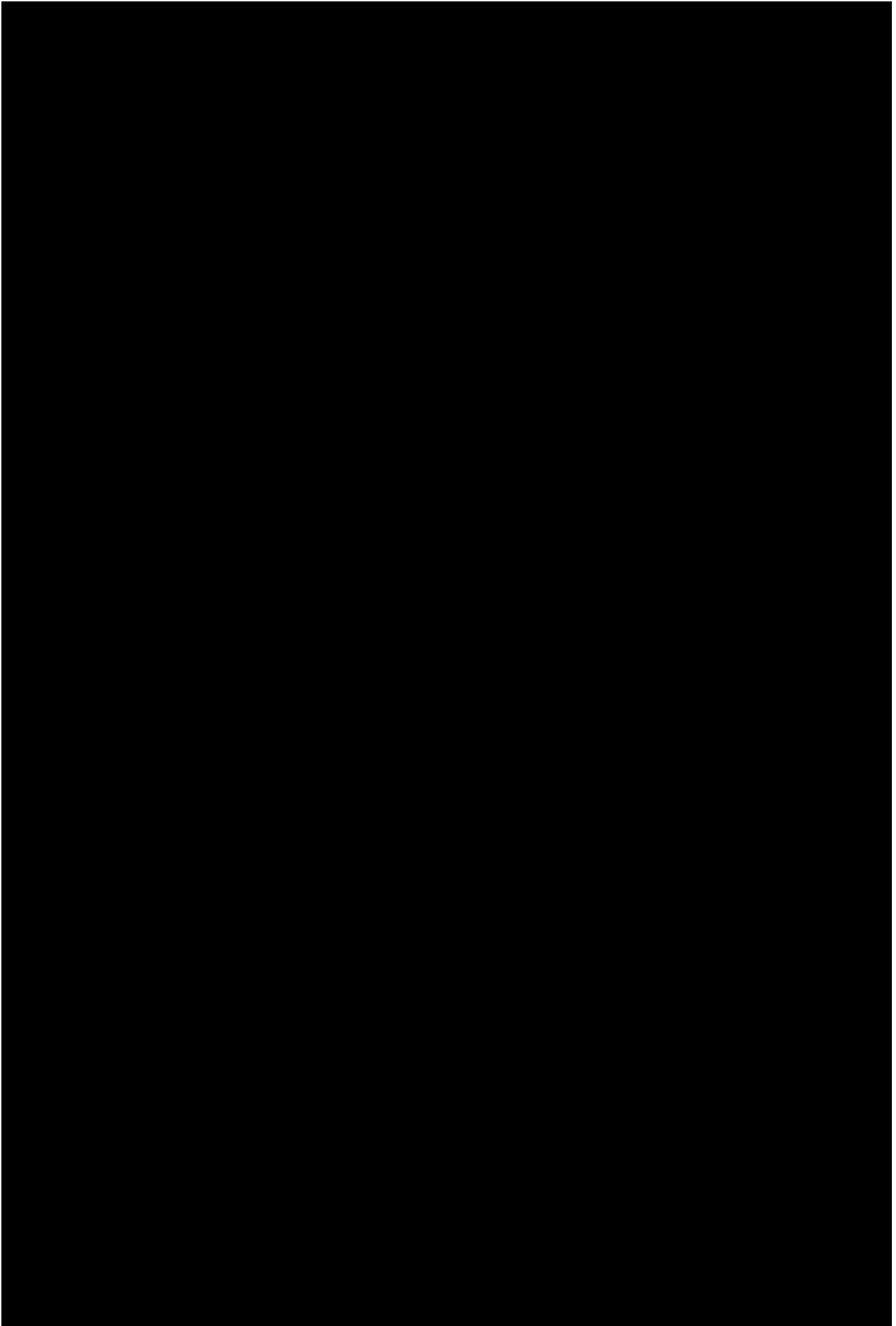


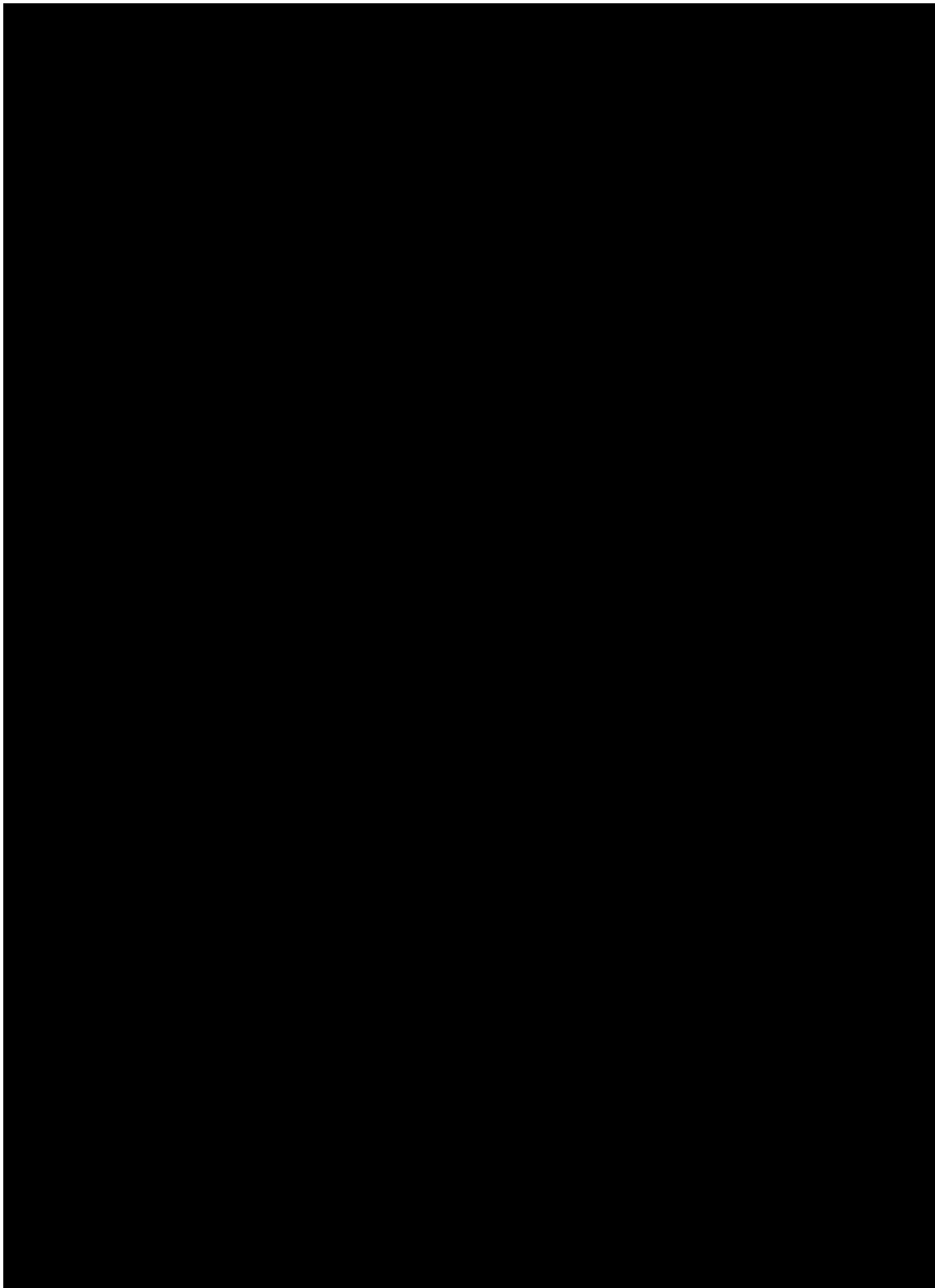


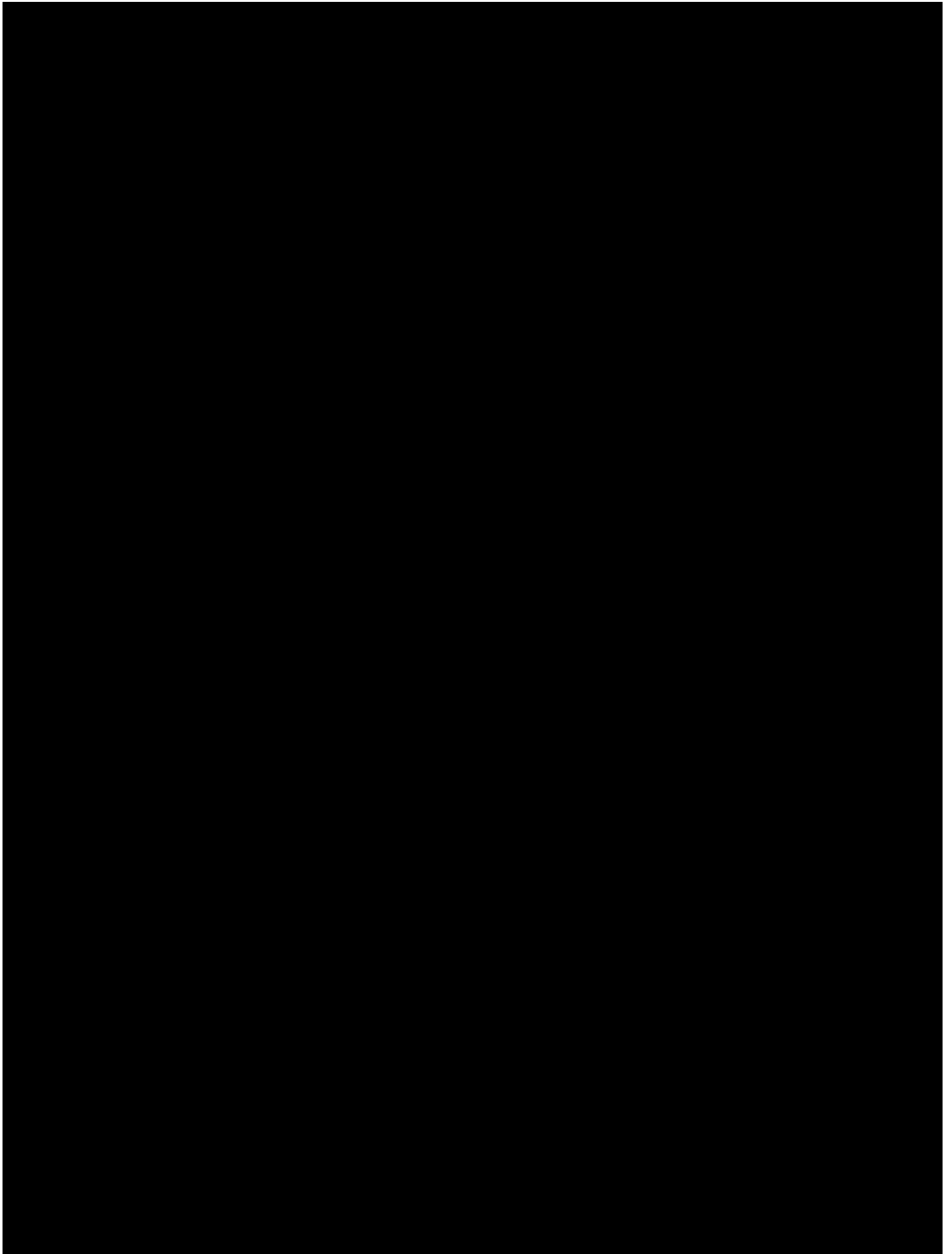


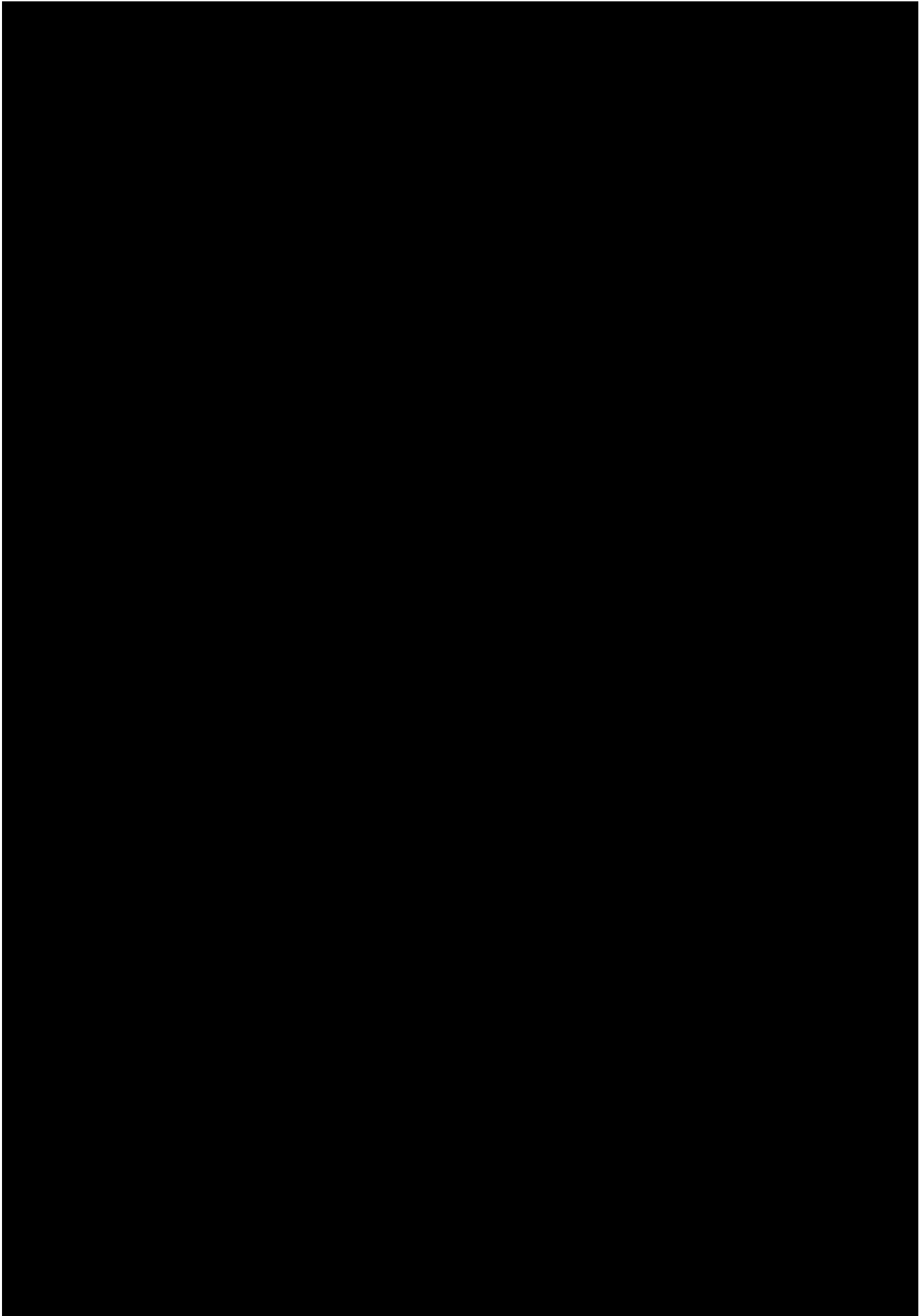


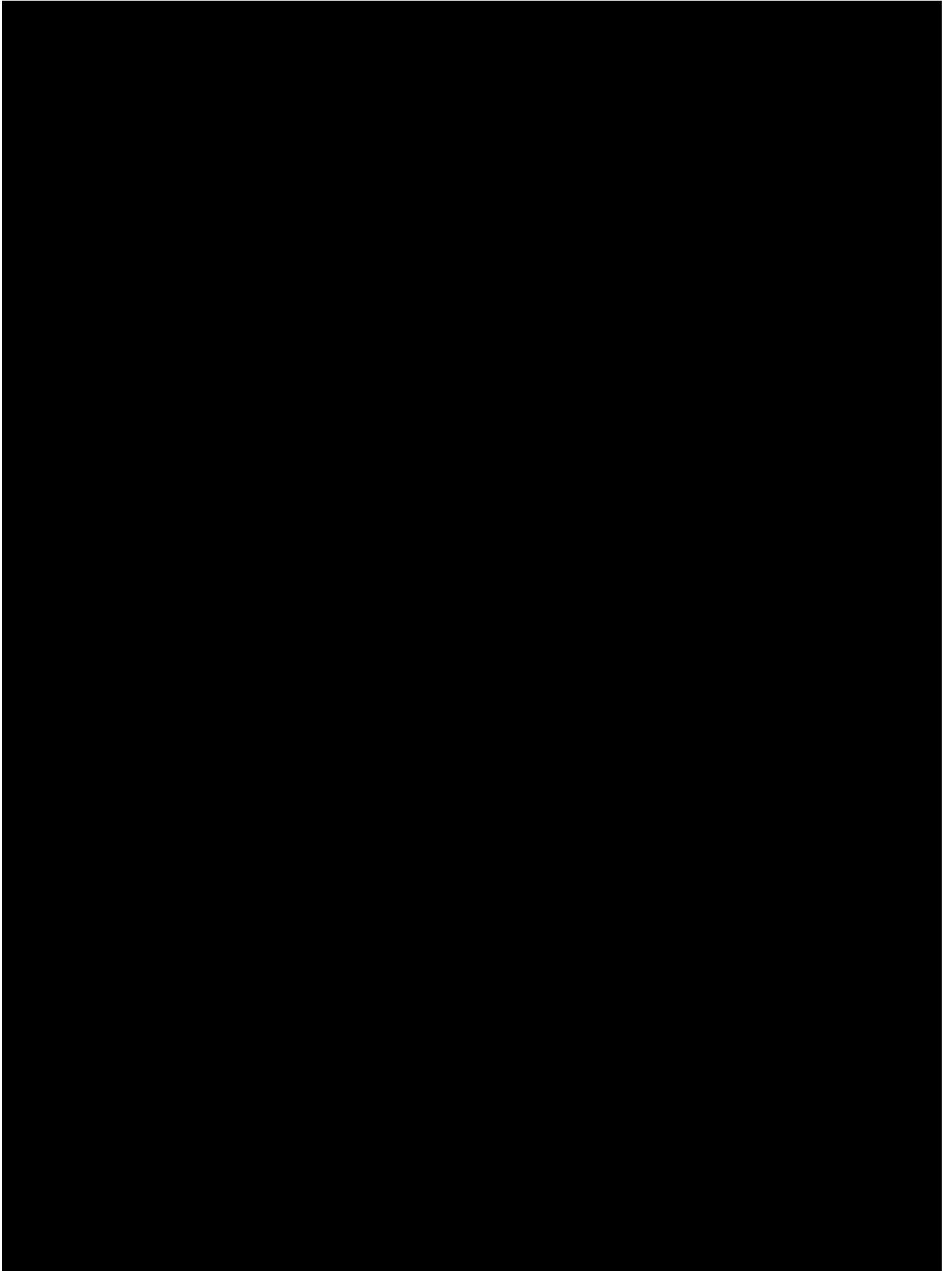












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B.1 APPLICANT'S ABILITY TO OFFER SPORTS WAGERING IN THE COMMONWEALTH

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

First, as Raynham Park's sportsbook service provider, Caesars Sportsbook will have controls in place to ensure that all sports wagering markets are limited to only those that are approved by the Massachusetts Gaming Commission. Its systems have the capability to restrict any markets that are not permissible. Additionally, Caesars Sportsbook has a substantial in-house trading team that regularly monitors markets that are available which is noted in Section B.1.a. At this time, Caesars does not intend to limit participation in allowable sports events.

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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

The key features of the customer experience that will be provided by Raynham Park at its new, state-of-the-art sports wagering and pari-mutuel race betting facility include the following:

- Raynham Park is constructing a brand-new sports wagering facility, boasting over 30,000 square feet of gaming floor space, expected to contain at least 20 self-service kiosks. These kiosks will be placed strategically throughout the space. Raynham Park will also be pre-wired for additional future kiosk growth throughout the space if demand warrants. The sportsbook will also provide the customer with other locations to place wagers, at an expected total of at least 5 betting windows. These betting windows will be clearly visible and marked with signage.
- Customers electing to utilize self-service kiosks will be greeted by Raynham Park team members, to assist with the electronic wagering process during the initial launch.
- The sports wagering area will contain \$2,800,000 of audio-visual equipment, to include a stadium seating area overlooking a 63'x10' LED board, two 52'x7' LED boards, one 30'x7' LED board, one 12'x6' LED board, two 120'x2' LED sport tickers (displaying game odds), and hundreds of LED television screens located throughout the space – leading to over 400 video displays. This visual experience should be unrivaled in any venue in New England.
- Two dining options will be offered to Raynham Park customers. There will be a 70' counter service station for American-style casual fare and non-alcoholic beverages. Customers can also order these options at all table and bar seating from the waitstaff. Raynham Park will operate its own fine dining restaurant inside the facility, offering a more upscale Italian-American menu.
- Two VIP rooms, one of which accommodates up to 15 people, the other, 35 people, will provide an unparalleled private experience. Both VIP rooms will offer private waitstaff, self-service kiosks, and phone charging stations.

Caesars Sportsbook's proprietary betting technology and trading platform will give players more options to bet (e.g., live wagering), while also enjoying the social atmosphere and ambiance. With over 180 retail sportsbooks operating across North America, Caesars Sportsbook is the leader in retail sports wagering.

Caesars Sportsbook provides best-in-class experiences and connect patrons to the sportsbooks so that they're more than just transactional locations. The goal is to create an environment where customers can

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come to watch the game while enjoying the sportsbook experience. For more experienced bettors, Caesars Sportsbook will create a seamless environment to place a wager at the betting window or self-service kiosk. Caesars Sportsbook's proprietary betting technology and trading platform will give players more options to bet (e.g., live wagering and parlays), while also enjoying the social atmosphere and ambiance.

While some customers prefer to wager with a live teller, particularly for larger transactions, self-service kiosks, tend to be the most popular method of placing a wager, especially in new markets. Caesars Sportsbook envisions kiosks distributed throughout the sportsbook and other approved areas at Raynham Park.

At the Caesars Sportsbook at Raynham Park, Caesars Sportsbook will create an integrated customer experience to complement the mobile offering. Retail will help build consumer trust and aids in driving digital customer acquisition and growth. Caesars Sportsbook knows from experience that multi-channel customers are the most valuable customers. While Caesars Sportsbook expects the vast majority of handle and revenue in Massachusetts to come via online and mobile channels, they know that the social, experiential aspect of sports betting remains attractive to a significant portion of the population. In its experience, having convenient retail locations where customers can deposit and withdraw funds in person enhances brand loyalty. Caesars Sportsbook believes in customer service, and in-person locations provide another opportunity for Caesars Sportsbook to answer questions and help patrons face-to-face.

To attract and retain retail customers, Caesars Sportsbook deploys a range of offers, including free bets, branded Caesars Sportsbook merchandise, and Caesars Rewards and Tier Credits. Caesars Sportsbook utilizes in-app messaging, email, social media, and direct mail to engage with its customers. Customers can stop by the retail sportsbook for assistance from Caesars Sportsbook Team Members, or contact customer support through in-app chat, text, email, or by phone.

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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

Caesars Sportsbook's ultimate parent company, Caesars Entertainment, Inc. ("Caesars Entertainment"), completed its purchase of William Hill in April 2021. With the purchase, Caesars Entertainment took full control and operation of its own sports betting technology platforms.

Caesars Sportsbook's Liberty platform, which is operative and received GLI approval in multiple jurisdictions, and Computerized Bookmaking Systems ("CBS"), its legacy platform (which is primarily utilized in Nevada), handled ██████████ in retail sports wagers in the 12 months November 2021 to October 2022. Caesars Sportsbook is currently in the process of migrating its entire business from the CBS platform to Liberty and plans to deploy Liberty in Massachusetts.

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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:

c. Estimated volume of wagering activity (*annually*)

<i>in millions</i>	Year 1	Year 2	Year 3	Year 4	Year 5
Wagering Volume (Handle)					

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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:

d. Estimated market share within each jurisdiction

The following table shows Caesars Sportsbook’s retail sports wagering market share by jurisdiction, based on handle for the 12 months November 2021 to October 2022, except where noted. The market shares are calculated based on publicly reported sports wagering handle (where available). In jurisdictions where figures are not broken down at the operator level, Caesars Sportsbook’s market share is calculated using its unreported handle divided by the jurisdiction’s overall handle.

U.S. Jurisdiction	LTM Market Share
Delaware ¹	
North Carolina ²	
Rhode Island ¹	
District of Columbia ⁴	
Indiana	
Nevada	
New York ³	
Louisiana	
Arizona ⁴	
Mississippi	
Iowa	
West Virginia	
New Jersey	
Maryland	
Pennsylvania	
Illinois ⁴	
Colorado ⁴	
Michigan	
New Mexico ⁵	
Washington ⁵	
Ontario, Canada ⁶	
Puerto Rico ⁶	
Ohio ⁶	

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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**

Raynham Park currently has ■ employees of which ■ are full-time and ■ are part-time.

Caesars Sportsbook is based in Las Vegas, Nevada with certain support operations in Jersey City, New Jersey. As such, its Team Member base is in Nevada and New Jersey with some Team Members working remotely in certain positions. As an already established sports wagering operator, its Team Members are trained in the positions for which they were hired. Currently, for its mobile sports wagering operations, Caesars Sportsbook employs ■ full-time Team Members that reside in Massachusetts who work remotely.

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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

One. Raynham Park, 1958 Broadway, Raynham, Massachusetts.

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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**

Raynham Park expects to hire [REDACTED] employees to support the sportsbook operation including for food and beverage and other retail-related services.

To operate the sportsbook at Raynham Park, Caesars Sportsbook plans to create [REDACTED] positions at the retail sportsbook, [REDACTED] full-time and [REDACTED] part-time.

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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**

For Raynham Park: Please see Exhibit C.1.d Raynham Park Job Descriptions and Benefits.

Position	# of Positions	PT/FT	Hourly Rate
Executive Chef			
Security Shift Supervisor			
Restaurant Manager			
Human Resource Generalist			
Benefits Coordinator			
IT Technician			
Accountant			
Payroll Clerk			
Receiving Clerk			
Security Officer			
Special Event Coordinator			
Sous Chef			
Executive Assistant			
Count Room Clerk			
Line Cook			
Lottery Clerk			
Counter Staff			
Hostess			
Maitre d'			
Dishwasher			
Program Coordinator			
Food Runner			
Barback			
Bartender			
Busser			
DR Server			
Food Server			

For Caesars:

Position	Headcount	Type	Pay
Full-Time Sportsbook Ticket Writer			
Part-Time Sportsbook Ticket Writer			

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Assistant Sportsbook Manager/Supervisor	█	█	█
Sportsbook Manager/Shift Manager	█	█	█

CAESARS SPORTSBOOK JOB POSTING

Job Title: Sportsbook Ticket Writer

Reports to: Sportsbook Manager/Shift Manager

WELCOME TO THE EMPIRE! Caesars is one of the biggest names in the world of betting and we are striving to become the largest sports betting platform across America. We share a passion for sports and are industry leaders providing best-in-class service for all our customers.

BEHOLD! Caesars Sportsbook, America's leading sportsbook provider, has immediate openings for Sportsbook Ticket Writer. Do you love interacting with the public? Thrive in a fast-paced work environment? If you answered yes, keep on reading.

The Sportsbook Ticket Writer is the face of our retail operation. By providing a high-level of customer service to both regulars and “novice bettors”, they will ensure everyone is made to feel welcome at our sportsbook(s). As an expert in our menu of sports betting options, the Ticket Writer will help advise and answer customer questions to help them make an informed, responsible decision with their sports wagering.

Why Join Our Team:

- Full-time employees eligible for benefits after waiting period (medical, dental, vision, etc.)
- Flexible scheduling (nights, weekends, mornings, holidays, etc.)
- Advancement opportunities - come grow a career with us!

What You Will Do:

- Provide a high level of customer service to anyone who comes into our sportsbooks
- Adhere to all rules and regulations set forth by the company and the Massachusetts Gaming Commission
- Answer all customer questions to the best of your knowledge or seek to find out the answer in a timely manner
- Try to deescalate customer disputes/complaints and escalate to direct supervisor when needed
- Communicate and promote our menu of sports betting options to customers
- Act in a professional manner, representing Caesars Sportsbook with the highest of standards
- Ensure that all necessary compliance (Title 31) paperwork/documentation is filled out according to company policy and gaming control board standards
- Other duties as assigned

What You Will Need:

- The ability to sit/stand for extended periods at a time

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- Must have basic computer knowledge (Email, MS Excel, internet, etc.)
- H.S. Diploma, GED, or equivalent preferred
- Must be 21 years of age or older
- Successfully pass a drug screen, background check, and obtain a gaming license
- Must have 1+ years of cash handling experience
- High level of customer service
- Ability to work a flexible schedule, including some nights, weekends, and holidays is preferred
- Present yourself in a professional manner
- Strong communication skills, both written and verbal
- Ability to do simple math
- Understanding and a responsibility to adhere to all compliance requirements set forth by the company and Massachusetts Gaming Commission
- Prior work experience in a sportsbook is highly preferred
- Ability to motivate, lead, and mentor staff members
- Effective communication skills, both written and verbal
- Professional appearance and demeanor
- Self-starter attitude who shows initiative
- Committed to delivering an elevated level of customer service

Physical Requirements:

- Must be able to stand for extended periods of time
- Must be able to lift, pull or push 25 lbs.
- Must be able to write for extended periods of time
- Must be able to twist, bend or reach with no significant boundaries
- This position may be exposed to a smoke-filled environment

The above statements are intended to describe the general nature and level of work being performed by people assigned to this classification. They are not intended to be construed as an exhaustive list of all responsibilities, duties and skills required of personnel so classified.

Caesars Sportsbook & Casino reserves the right to make changes to the job description whenever necessary.

As a part of Caesars Sportsbook & Casino's employment process, finalist candidates will be required to complete a drug test and background check upon offer acceptance.

CAESARS SPORTSBOOK JOB POSTING

Job Title: Sportsbook Assistant Manager/Supervisor
Reports to: Sportsbook Manager/Shift Manager

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WELCOME TO THE EMPIRE! Caesars is one of the biggest names in the world of betting and we are striving to become the largest sports betting platform across America. We share a passion for sports and are industry leaders providing best-in-class service for all our customers.

BEHOLD! Caesars Sportsbook, America's leading sportsbook provider, has immediate openings for Sportsbook Assistant Manager/Supervisor. Do you love interacting with the public? Thrive in a fast-paced work environment? If you answered yes, keep on reading.

The Sportsbook Assistant Manager/Supervisor is responsible for effectively managing Sportsbook Supervisors and Ticket Writers in a high-performing, welcoming environment that is focused on customer service and compliance. The position assists with the scheduling of Ticket Writers/ Supervisors to ensure full coverage of sportsbook terminals and generates opportunities to promote a positive image for Caesars Sportsbook within the industry and community.

Why Join Our Team:

- Full-time employees eligible for benefits after waiting period (medical, dental, vision, etc.)
- Flexible scheduling (nights, weekends, mornings, holidays, etc.)
- Advancement opportunities - come grow a career with us!

What You Will Do:

- Effectively manage and schedule Sportsbook Supervisors and Ticket Writers to ensure full coverage of sportsbook terminals
- Place and replenish sheets/parlay cards
- Write compliance paperwork/MTLs
- Manage cash drops and cash replenishment
- Approve ticket cashing as determined by approval matrix and internal controls
- Assist in Reward card signup
- Maintain thorough knowledge of sport betting terminology to assist customers with placing wagers
- Ensure policies and procedures are adhered to daily
- Develop relationships with customers and ensure they feel welcomed
- Keep a par list of supplies for the Manager
- Provide support to Ticket Writers to handle customer complaints/disputes
- Assist in handling the day-to-day activities of a sportsbook
- Foster an environment focused on customer service and compliance
- Promote a positive image for the company within the industry and community
- Enabling and disable kiosks for daily wagering
- Monitoring customer activity on kiosks for compliance and AML purposes
- Reset unregistered cash and payout totals and complete necessary paperwork for kiosk wagering
- Monitor back-office status for kiosk error faults, perform trouble shooting steps for repair, and escalate to next line support when applicable

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What You Will Need:

- 2+ years' experience as a Sportsbook Supervisor
- Must be able to work independently with minimal supervision
- Must be confident in one's ability to assess situations and make informed decisions
- Good interpersonal communication skills
- Ability to manage relationships
- Strong problem-solving skills
- Ability to manage a diverse range of activities and effectively prioritize responsibilities
- Ability to obtain and/or be eligible for work authorization, regulatory licensing (where applicable)
- Prior work experience in a sportsbook is highly preferred
- Ability to motivate, lead, and mentor staff members
- Effective communication skills, both written and verbal
- Professional appearance and demeanor
- Self-starter attitude who shows initiative
- Committed to delivering an elevated level of customer service

Physical Requirements:

- Must be able to stand for extended periods of time
- Must be able to lift, pull or push 25 lbs.
- Must be able write for extended periods of time
- Must be able to twist, bend or reach with no significant boundaries
- This position may be exposed to a smoke-filled environment

The above statements are intended to describe the general nature and level of work being performed by people assigned to this classification. They are not intended to be construed as an exhaustive list of all responsibilities, duties and skills required of personnel so classified.

Caesars Sportsbook & Casino reserves the right to make changes to the job description whenever necessary.

As a part of Caesars Sportsbook & Casino's employment process, finalist candidates will be required to complete a drug test and background check upon offer acceptance.

CAESARS SPORTSBOOK JOB POSTING

Job Title: Sportsbook Manager/Shift Manager

Reports to: Sportsbook Area Manager/Department Manager

WELCOME TO THE EMPIRE! Caesars is one of the biggest names in the world of betting and we are striving to become the largest sports betting platform across America. We share a passion for sports and are industry leaders providing best-in-class service for all our customers.

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BEHOLD! Caesars Sportsbook, America's leading sportsbook provider, has immediate openings for Sportsbook Manager/Shift Manager. Do you love interacting with the public? Thrive in a fast-paced work environment? If you answered yes, keep on reading.

The Sportsbook Manager/Shift Manager is responsible for effectively managing the operations of our sportsbook and fostering a high-performing, welcoming environment that is focused on customer service and compliance.

Why Join Our Team:

- Full-time employees eligible for benefits after waiting period (medical, dental, vision, etc.)
- Flexible scheduling (nights, weekends, mornings, holidays, etc.)
- Advancement opportunities - come grow a career with us!

What You Will Do:

- Effectively assist and manage the day-to-day activities and business levels of the sportsbook: hiring, scheduling, training, and mentoring staff, and fostering an environment focused on high performance, compliance, and excellent customer service
- Act as an ambassador for the property to help promote sports wagering via our kiosks and mobile platforms
- Interact daily with senior leadership of our partner to serve as a brand ambassador to both racing and sportsbook patrons alike
- Manage all aspects of our sports betting equipment
- Demonstrate leadership and ensure operational effectiveness which will yield a successful operation
- Generate opportunities to maximize handle, profitability, and promotion of the Brand
- Ensure all customers (whether regular or infrequent) are made to feel welcome by all team members, always
- Ensure betting control guidelines are adhered to within the sportsbook
- Foster an environment focused on customer service and compliance
- Develop skills and knowledge of the sportsbook team
- Plan and execute an effective staffing model, keeping in line with an approved budget
- Direct and motivate the relevant stakeholders during planning, execution, and opening
- Establish and maintain effective and professional working relationships with internal and external contacts
- Promote a positive image for the company within the industry and community
- Additional duties as assigned

What You Will Need:

- 2+ years of management experience in a retail environment, preferably in a sportsbook
- Must be able to work independently with minimal supervision
- Must be confident in one's ability to assess situations and make informed decisions
- Good interpersonal communication skills
- Ability to manage relationships
- Strong problem-solving skills

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- Ability to manage a diverse range of activities and effectively prioritize responsibilities
- Successfully pass all onboarding requirements necessary for this job (drug screen, background, etc.)
- Prior work experience in a sportsbook is highly preferred
- Ability to motivate, lead, and mentor staff members
- Effective communication skills, both written and verbal
- Professional appearance and demeanor
- Self-starter attitude who shows initiative
- Committed to delivering an elevated level of customer service

Physical Requirements:

- Must be able to stand for extended periods of time.
- Must be able to lift, pull or push 25 lbs.
- Must be able write for extended periods of time
- Must be able to twist, bend or reach with no significant boundaries
- This position may be exposed to a smoke-filled environment

The above statements are intended to describe the general nature and level of work being performed by people assigned to this classification. They are not intended to be construed as an exhaustive list of all responsibilities, duties and skills required of personnel so classified.

Caesars Sportsbook & Casino reserves the right to make changes to the job description whenever necessary.

As a part of Caesars Sportsbook & Casino's employment process, finalist candidates will be required to complete a drug test and background check upon offer acceptance.

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EXHIBIT C.1(d)

Position	# of Positions	PT/FT	Hourly Rate
Executive Chef			
Security Shift Supervisor			
Restaurant Manager			
Human Resource Generalist			
Benefits Coordinator			
IT Technician			
Accountant			
Payroll Clerk			
Receiving Clerk			
Security Officer			
Special Events Coordinator			
Sous Chef			
Executive Assistant			
Count Room Clerk			
Line Cook			
Lottery Clerk			
Counter Staff			
Hostess			
Maitre d'			
Dishwasher			
Program Coordinator			
Food Runner			
Barback			
Bartender			
Busser			
DR Server			
Food Server			

Title: Accountant

Job Description: The Raynham Park Accountant will be responsible for all accounting processes related to A/P, A/R, cash deposits, cash disbursements, and general ledger accounting. In addition, they will ensure ensures timely and accurate payment processing. All duties will be performed in accordance with departmental and company policies, practices, and procedures.

Salary: [REDACTED]

Benefits: [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

Title: Barback

Job Description: The Raynham Park Barback will be responsible for ensuring bartenders and servers have the inventory needed, to include: beer, wine, spirits, glassware, dishware, and utensils. All duties will be performed in accordance with departmental and company policies, practices, and procedures.

Salary: [REDACTED]

Benefits: [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Title: Bartender

Job Description: The Raynham Park Bartender will be responsible for taking orders, preparing and serving beverages, and serving food items, to guests at bar counters. This position requires a strong knowledge of beer, wine, liquor, and preparation of mixed drinks, as well as an understanding and implementation of health and sanitation standards, and safe alcohol service. All duties will be performed in accordance with departmental and company policies, practices, and procedures.

Salary: [REDACTED]

Benefits: [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

Title: Benefits Coordinator

Job Description: The Raynham Park Benefits Coordinator will be responsible for developing and administering employee benefits programs, under the direction of the Human Resource Manager, including: medical, dental, vision, life, short and long term disability insurance, and 401K plans. In addition, they will assist with new employee onboarding, to wellness initiatives and leave policies. Assist with new employee onboarding, changes to benefits, benefits enrollment questions, and newly separated employees. All duties will be performed in accordance with departmental and company policies, practices, and procedures.

Salary: [REDACTED]

Benefits: [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Title: Busser

Job Description: The Raynham Park Busser will be responsible for clearing, cleaning, and setting dining room tables and chairs, in the restaurant. They will work directly with hostess and servers, to ensure tables are ready, for guest seating. All duties will be performed in accordance with departmental and company policies, practices, and procedures.

Salary: [REDACTED]

Benefits: [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Title: Count Room Clerk

Job Description: The Raynham Park Count Room Clerk, under the direction of the Count Room Supervisor, will be responsible for the collection, sorting, counting, and recording of currency, as assigned. All duties will be performed in accordance with departmental and company policies, practices, and procedures, as well as Massachusetts Gaming Commission regulations.

Salary: [REDACTED]

Benefits: [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

Title: Counter Staff

Job Description: The Raynham Park Counter staff will have the primary responsibility of providing high quality food and beverage service to guests, in a fast paced work environment, while following all local Board of Health and ServSafe requirements. All duties will be performed in accordance with departmental and company policies, practices, and procedures.

Salary: [REDACTED]

Benefits: [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

Title: Dishwasher

Job Description: The Raynham Park Dishwasher will be responsible for cleaning and maintaining dishware, glassware, and utensils. They will keep a clean dish area, maintain organized food storage areas, and assist with cleaning projects throughout the kitchen, under the direction of the Executive Chef or their designee. All duties will be performed in accordance with departmental and company policies, practices, and procedures.

Salary: [REDACTED]

Benefits: [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

Title: Dining Room Server

Job Description: The Raynham Park Dining Room Server will be responsible for taking and delivering customer orders, maintaining tables, ensuring guest satisfaction, and finalizing checks. The food server is also responsible for performing side work and general cleaning of assigned stations, under the direction of the Restaurant Manager. All duties will be performed in accordance with departmental and company policies, practices, and procedures.

Salary: [REDACTED]

Benefits: [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

Title: Executive Assistant

Job Description: The Raynham Park Executive Assistant will be responsible for executing assigned tasks, assigned by members of the Executive Management team, answering and screening incoming calls and visitors, directing them to appropriate departments, in a professional, pleasant manner. All duties will be performed in accordance with departmental and company policies, practices, and procedures.

Salary: [REDACTED]

Benefits: [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

Title: Executive Chef

Job Description: The Raynham Park Executive Chef will responsible for all aspects of management of the restaurant and kitchen operations. They will provide direction and leadership for the entire culinary team. They will be responsible for leading the team to achieve the operational and financial goals of the facility; maintaining recipes, inventory, and supply management for the kitchen; overall cost controls; monitoring the performance, scheduling and training of the staff; executing initiatives as implemented by property F&B leadership; maintaining the facilities in accordance with ServSafe and Board of Health standards. All duties will be performed in accordance with departmental and company policies, practices, and procedures.

Salary: [REDACTED]

Benefits: [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

Title: Food Runner

Job Description: The Raynham Park Food Runner will be responsible for working with servers, bar and kitchen staff, to ensure efficient delivery of food to servers and/or guests, throughout the facility. They will ensure that the food order is accurate, before leaving the kitchen. All duties will be performed in accordance with departmental and company policies, practices, and procedures.

Salary: [REDACTED]

Benefits: [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

Title: Food and Beverage Server – Gaming Floor

Job Description: The Raynham Park Gaming Floor Food and Beverage Server will be responsible for taking customer orders, ensuring efficient delivery of orders, maintaining tables, guest satisfaction, and finalizing checks. They will also be responsible for performing side work and general cleaning of assigned stations. All duties will be performed in accordance with departmental and company policies, practices, and procedures.

Salary: [REDACTED]

Benefits: [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Title: Hostess

Job Description: The Raynham Park Hostess, under the direction of the Restaurant Manager, will be responsible for fielding and maintaing incoming restaurant reservations, welcoming and greeting guests, and directing guests to their dining seats. All duties will be performed in accordance with departmental and company policies, practices, and procedures.

Salary: [REDACTED]

Benefits: [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

Title: Human Resource Generalist

Job Description: The Raynham Park Human Resource Generalist will be responsible for handling administrative and office support activities for the Human Resource Department, including applicant interviews, employee background and reference checks, onboarding of new hires, and department record keeping. All duties will be performed in accordance with departmental and company policies, practices, and procedures.

Salary: [REDACTED]

Benefits: [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Title: IT Technician

Job Description: The Raynham Park IT Technician will be responsible for ensuring system operations and functionality, so that end users can accomplish business tasks. They will be respond to support requests in a timely manner and be the initial reference point, for all IT support related tickets. All duties will be performed in accordance with departmental and company policies, practices, and procedures, as well as Massachusetts Gaming Commission regulations.

Salary: [REDACTED]

Benefits: [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

Title: Line Cook

Job Description: The Raynham Park Line Cook will prepare food in accordance with applicable federal, state and corporate standards, guidelines and regulations. They will ensure quality food service is provided, at all times. The line cook will work closely, with all culinary team members, under the direction of the Executive Chef. All duties will be performed in accordance with departmental and company policies, practices, and procedures.

Salary: [REDACTED]

Benefits: [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Title: Lottery Clerk

Job Description: The Lottery Clerk will facilitate the sale of all Massachusetts Lottery products, including: instant tickets, daily numbers, Mass Cash, Mega Millions, Powerball, KENO and any new additions, to the Lottery product line. All duties will be performed in accordance with departmental and company policies, practices, and procedures, as well as Massachusetts Gaming Commission regulations.

Salary: [REDACTED]

Benefits: [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

Title: Maitre d'

Job Description: The Raynham Park Maitre d' will oversee the greeting and seating of guests, in the gaming area. They will guide customers to their tables and answer any questions customers may have regarding food, drinks, and specials. They will also resolve customer concerns or disputes. All duties will be performed in accordance with departmental and company policies, practices, and procedures.

Salary: [REDACTED]

Benefits: [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Title: Payroll Clerk

Job Description: The Raynham Park Payroll Clerk will be responsible for maintaining payroll data and records, verifying employees' work hours and payment through the payroll system, issuing deductions, earnings and other statements to employees and updating payroll records regularly. Must possess excellent organizational skills to ensure accurate record maintenance. Ability to use basic computer software applications such as spreadsheets and word processing as well as become proficient with department-specific computer programs. All duties will be performed in accordance with departmental and company policies, practices, and procedures.

Salary: [REDACTED]

Benefits: [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

Title: Program Coordinator

Job Description: The Raynham Park Program Coordinator will be responsible for greeting guests and maintaining inventory and sale of all simulcast racing programs. All duties will be performed in accordance with departmental and company policies, practices, and procedures.

Salary: [REDACTED]

Benefits: [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Title: Receiving Clerk

Job Description: The Raynham Park Receiving Clerk will be responsible for verifying all information on shipment arrivals and ensuring items are received, in a timely manner. They will maintain a log of all shipments received, sign for those shipments, and facilitate internal package deliveries. All duties will be performed in accordance with departmental and company policies, practices, and procedures.

Salary: [REDACTED]

Benefits: [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Title: Restaurant Manager

Job Description: Raynham Park Restaurant Manager will be responsible for all aspects of daily operations including: staffing and labor management, ordering and inventory, guest service and execution of all associated Food & Beverage to standards of preparation and presentation, ensuring an excellent guest and team member experience.

Salary: [REDACTED]

Benefits: [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Title: Security Officer

Job Description: The Raynham Park Security Officer will be responsible for properly executing security duties on assigned shifts, to adequately protect the safety and property of guests, team members, and the facility. They will be responsible for ensuring all patrons entering the facility are at least 21 years of age. All duties will be performed in accordance with departmental and company policies, practices, and procedures, as well as Massachusetts Gaming Commission regulations.

Salary: [REDACTED]

Benefits: [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Title: Security Shift Supervisor

Job Description: The Raynham Park Security Shift Supervisor will be responsible for implementing and maintaining policies and programs, to ensure physical safety of Raynham Park guests, employees, and property. They will supervise all security staff assigned, to their shifts. All duties will be performed in accordance with departmental and company policies, practices and procedures and in compliance with Massachusetts State Gaming Commission regulations.

Salary: [REDACTED]

Benefits: [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

Title: Sous Chef

Job Description: The Raynham Park Sous Chef will be responsible for supervising all culinary operations. They will ensure all food quality is superior, under the director of the Executive Chef. All duties will be performed in accordance with departmental and company policies, practices, and procedures.

Salary: [REDACTED]

Benefits: [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Title: Special Events Coordinator

Job Description: The Raynham Park Special Events Coordinator will coordinate and execute special events and facilitate promotions, in conjunction with the marketing team. All duties will be performed in accordance with departmental and company policies, practices and procedures.

Salary: [REDACTED]

Benefits: [REDACTED]

[REDACTED]

[REDACTED]

[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

For employees hired by Raynham Park, Raynham Park will primarily rely on on-site job training which is customary for the positions Raynham Park expects to hire for food and beverage and other support services such as security. In addition, select employees that will interact with sports wagering patrons will receive annual training regarding responsible gaming, both for their benefit, and to assist in recognition of possible irresponsible wagering of patrons.

For employees directly involved in the sportsbook, Caesars Sportsbook equips its Team Members with the knowledge, skills and tools to perform their roles effectively. This means providing basic training in all necessary on-the-job skills, including responsible gaming, corporate essentials such as ethics, compliance, anti-bribery and anti-corruption, as well as programs for personal and professional development and growth. Caesars Sportsbook's new learning and development framework, Caesars University, incorporates education, development and leadership programs to meet a wide range of training needs. In addition, Team Members take required programs, including Code of Conduct, ethics, safety, security, privacy and more.

Furthermore, all newly hired Team Members must complete a new Team Member orientation class. The course includes all mandatory and basic job training along with an introduction to Caesars Sportsbook culture and history. Alongside identified training needs that emerge through the performance review process, Caesars Sportsbook strongly encourage Team Members to be proactive and undertake additional training to help them achieve their personal and professional goals.

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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:

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

The sportsbook facility is being constructed at Raynham Park, 1900 Broadway, Raynham, MA. This will be the sportsbook's only location.

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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:

g. Description of plans for workforce development opportunities for Applicant's staff within the Commonwealth

Raynham Park has been an employer in the Taunton-Brockton area for over 50 years. Over those years, Raynham Park has employed generations of local families and been a constant source of employment through the height of live racing in the late 90's to its transition to a simulcast only facility due to the statewide ballot initiative banning live greyhound racing. George L. Carney, Jr., Raynham Park's long-time CEO and owner started out at the track as a lead-out boy in 1942 to eventually become the track's owner in 1966. As an applicant for a sports wagering license, Raynham Park is likely the smallest employer to come before the Commission, yet its commitment to its employees is just as strong. While MGA does not have the infrastructure or size for a formal workforce development plan, MGA is committed to looking within its own ranks when opportunities for advancement arise. Just as important as job advancement is job satisfaction – the average years of employment for employees at Raynham Park is 22 years.

Nevertheless, with the new opportunities provided by sports wagering and Raynham Park's partnership with a gaming leader like Caesars Sportsbook, Raynham Park is committed to investing in its existing and future workforce through advancement opportunities. Raynham Park will provide internal postings for any new or open position prior to moving outside the organization for hiring. Priority will be placed on internal applicants for any new or open position. While hiring for any sportsbook-specific position will be within the discretion of Caesars Sportsbook, Raynham Park will coordinate the posting of sportsbook positions internally as well.

Caesars Sportsbook encourages Team Members to consider career advancement and provide visibility to different career paths, across various functions and levels to help them make informed choices and plan future moves. Caesars Sportsbook also assesses its Team Members for performance and potential and aims to build a succession pipeline for key leadership and functional roles.

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

As set forth above, Raynham Park has been a steady employer in the Taunton-Brockton area for over 50 years. This region of Massachusetts does have some economic challenges, and Raynham Park will focus its recruiting efforts and new opportunities in the Taunton-Brockton area. Raynham Park's surrounding communities are diverse, both economically and ethnically. Geographically, the cities of Brockton and Taunton are within a fifteen-minute commute to Raynham Park. Raynham is conducting outreach to the Greater Attleboro and Taunton Regional Transit Authority (GATRA) to add a transportation route to its location. Public Transportation will open up opportunities to those unemployed due to the inability to commute to and from work and increase the diversity of Raynham Park's applicant pool.

Raynham Park will advertise available job opportunities in all local news outlets (e.g., *Brockton Enterprise*, *Taunton Gazette*, *The Sun Chronicle*). We will work with local town and city groups to promote employment opportunities, with us.

In addition, Raynham Park will leverage its partnership with Caesars Sportsbook for its own hiring and will seek to utilize its wide range of channels for diverse recruiting, including outreach to nonprofits that help Caesars Sportsbook source a rich diversity of candidates. Caesars Sportsbook's human resources managers and recruiters receive training on the Company's inclusive and equitable recruitment processes. Additionally, to support hiring initiatives across the enterprise, Caesars Sportsbook maintains a Careers website that includes valuable information on company culture, benefits, open positions and an invitation to apply. The site highlights Caesars Sportsbook's commitment to Corporate Social Responsibility (CSR), including diversity, equity and inclusion, and Caesars Sportsbook welcomes candidates from all backgrounds to consider joining the Company. Caesars Sportsbook encourages Team Members to recommend working at Caesars Entertainment to their family and friends and provides rewards for successful referrals.

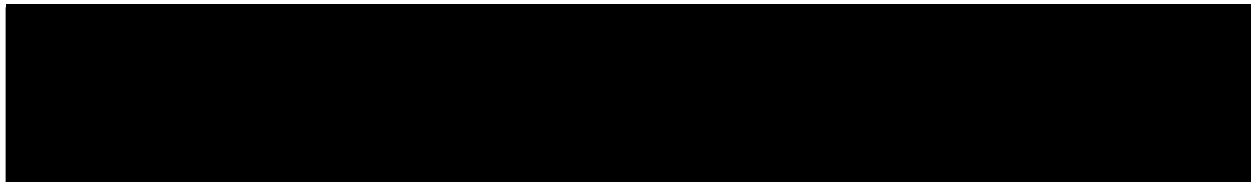
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C.2 PROJECTED REVENUE

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 the following:

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

Caesars Sportsbook projected sports betting revenue using its own methodology. Projected revenue from retail sports wagering is based on several factors, including past performance in other jurisdictions, competitors in the market, population density, location of the property, as well as available market data in other live jurisdictions, and understanding of likely market dynamics.



<i>in millions</i>	Year 1	Year 2	Year 3	Year 4	Year 5
Average Scenario					
Best Scenario					
Worst Scenario					

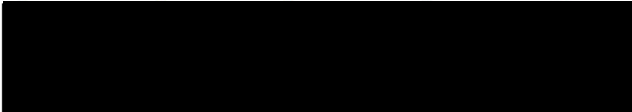
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C.2 PROJECTED REVENUE

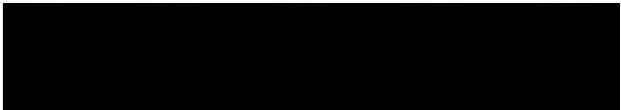
Provide studies and projections for gross sports wagering revenue for each of the first five years of wagering operations on a best, average, and worst-case basis. The studies and information provided should include the following:

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

Projected gross revenue from retail pari-mutuel racing (via simulcast) is based on past performance at Raynham Park, and trending market dynamics.

<i>in millions</i>	Year 1	Year 2	Year 3	Year 4	Year 5
Average Scenario					
Best Scenario					
Worst Scenario					

Raynham Park projects its food and beverage gross revenue using its own methodology: Projected gross revenue from our food and beverage service is based on several factors, including population density, physical location of the property, competitors in the market, and available market data in other jurisdictions. These factors are coupled with competitive price points to arrive at the below projections.

<i>in millions</i>	Year 1	Year 2	Year 3	Year 4	Year 5
Average Scenario					
Best Scenario					
Worst Scenario					

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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 the following:

- c. Projected figures for all tax revenue to the Commonwealth and methodology used to arrive at these projections**

Projected tax revenue from retail sports wagering to the Commonwealth is calculated as projected “adjusted gross receipts” (gross win, less payouts, and federal excise tax) from sports wagering at the retail sportsbook, multiplied by the retail tax rate of 15%. Projected tax revenue from retail pari-mutuel racing (via simulcast) to the Commonwealth is calculated as projected wagers (handle) from pari-mutuel racing at the retail sportsbook, multiplied by the pari-mutuel tax rate of 0.375%.

The projected tax revenues to the Commonwealth based on the average scenario are as follows:

<i>in millions</i>	Year 1	Year 2	Year 3	Year 4	Year 5
<u>Retail Sports</u>					
Gross Receipts					
Less: Federal Excise Tax					
Adjusted Gross Receipts					
Retail Sports Tax Rate	15%	15%	15%	15%	15%
Tax Revenue to the Commonwealth					
<u>Retail Pari-Mutuel</u>					
Pari-Mutuel Handle					
Pari-Mutuel Tax Rate	0.375%	0.375%	0.375%	0.375%	0.375%
Tax Revenue to the Commonwealth					
Total Tax Revenue to the Commonwealth					

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 the following:

d. Profitability of sports wagering operation (in-person & mobile) in other jurisdictions where the applicant is licensed

Retail Sports

In aggregate, Caesars Sportsbook is profitable across its retail sportsbooks. Retail sportsbooks are typically profitable within the first year of two of operations. Retail sportsbooks typically do not carry the level of marketing and promotional costs and intense competition of mobile sportsbooks. Operating expenses, primarily staffing, can be adjusted based on wagering volumes, and customers increasingly prefer to use self-service wagering kiosks. Most of Caesars Sportsbook's retail sportsbooks are in Nevada, which is a profitable state for the company.

Mobile Sports

Profitability for mobile sports wagering operations – depending on the competitive landscape, tax rate, and other market dynamics within the jurisdiction – will typically be negative in the first few years from launch due to the high costs of market access, licensing, and customer acquisition through marketing and promotional spend. Mobile sports wagering in most jurisdictions has only recently launched in the last 2-3 years, including during the COVID-19 pandemic when many sporting events were shortened or canceled.

Earlier in the year, [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

Once mobile sports wagering launches in Massachusetts, Caesars Sportsbook will continue to refine its marketing and operational strategies to adapt to the market dynamics. [REDACTED]
[REDACTED]
[REDACTED]

The Adjusted EBITDA (and additional details) for Caesars Digital, a segment of the ultimate parent company, Caesars Entertainment, Inc. ("Caesars Entertainment"), which include retail and mobile sports wagering, online horse racing wagering, online casino, and online poker, can be found in Caesars Entertainment's public reports, in the following links:

- Q3 2022 Earnings Release – <https://investor.caesars.com/static-files/58a8bc05-ac31-4398-a90e-cecad98cfcc0>
- 2022 Third Quarter Report (Form 10-Q) – <https://investor.caesars.com/node/32976/html>

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 the following:

- 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***

Caesars Sportsbook’s retail sports wagering revenue in each jurisdiction is dependent on several factors, including past performance in other jurisdictions, competitors in the market, population density, location of the property, as well as available market data in other live jurisdictions, and understanding of likely market dynamics.

Caesars Sportsbook has reviewed its revenue projections against its prior launches, and the company believes its overall projection methodology fairly represents the success of its go-live process. Caesars Sportsbook may refine its revenue projections during a fiscal year and its performance objectives may be reevaluated.

The following table shows Caesars Sportsbook’s total retail pari-mutuel and sports wagering revenue (historical and projected for the remainder of 2022).

<i>in millions</i>	2018	2019	2020	2021	2022
Total Gross Receipts (Revenue)	■	■	■	■	■

The Revenue (and additional details) for Caesars Digital, a segment of the ultimate parent company, Caesars Entertainment, Inc. (“Caesars Entertainment”), which include retail and mobile sports wagering, online horse racing wagering, online casino, and online poker, can be found in Caesars Entertainment’s public reports, in the following links:

- Q3 2022 Earnings Release – <https://investor.caesars.com/static-files/58a8bc05-ac31-4398-a90e-cecad98cfcc0>
- 2022 Third Quarter Report (Form 10-Q) – <https://investor.caesars.com/node/32976/html>

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 the following:

f. Description of methods to ensure that revenues are maximized within the Commonwealth

Caesars Sportsbook's and Raynham Park's goal will be to create an environment where customers can watch games, eat and drink, while enjoying the sportsbook experience. Caesars Sportsbook's proprietary betting technology and trading platform will give players more options to bet (e.g., live wagering, parlays), while also enjoying the social atmosphere and ambiance.

[REDACTED]

- | [REDACTED]
- | [REDACTED]
- | [REDACTED]
- | [REDACTED]
- | [REDACTED].

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 the following:

- g. Description of plans to compete with other nearby jurisdictions and to market to Massachusetts patrons**

[REDACTED]

[REDACTED]

- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]

For more specifics on Caesars Sportsbook’s Massachusetts Advertising Plans, please see Answer E.2 below.

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C.4 CONSTRUCTION – LIVE HORSE RACING/SIMULCASTING FACILITY
(Category 2 Applicants Only)

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

a. Location of proposed sports wagering operation (address)

The proposed Raynham Park sports wagering operation is currently being constructed on a parcel of land at 1900 Broadway, Raynham, Massachusetts. It is a 58,375 square foot building, which will feature 30,000 square feet of gaming space, dedicated to sports wagering and simulcast operations. At the time of this filing, the building has been erected and is weather tight, with an anticipated completion date of June 2023. Our current simulcast facility, still in operation, is located at 1958 Broadway, Raynham, Massachusetts. Upon licensure, and as part of its operations certificate, Raynham Park will request to allow Caesars Sportsbook to operate its retail sports wagering temporarily at our current location of 1958 Broadway which will include at least 10 self-service kiosks, and at least 5 betting windows. Raynham Park will then cease the temporary retail sports wagering at 1958 Broadway upon completion of the new facility located at 1900 Broadway.

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C.4 CONSTRUCTION – LIVE HORSE RACING/SIMULCASTING FACILITY
(Category 2 Applicants Only)

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

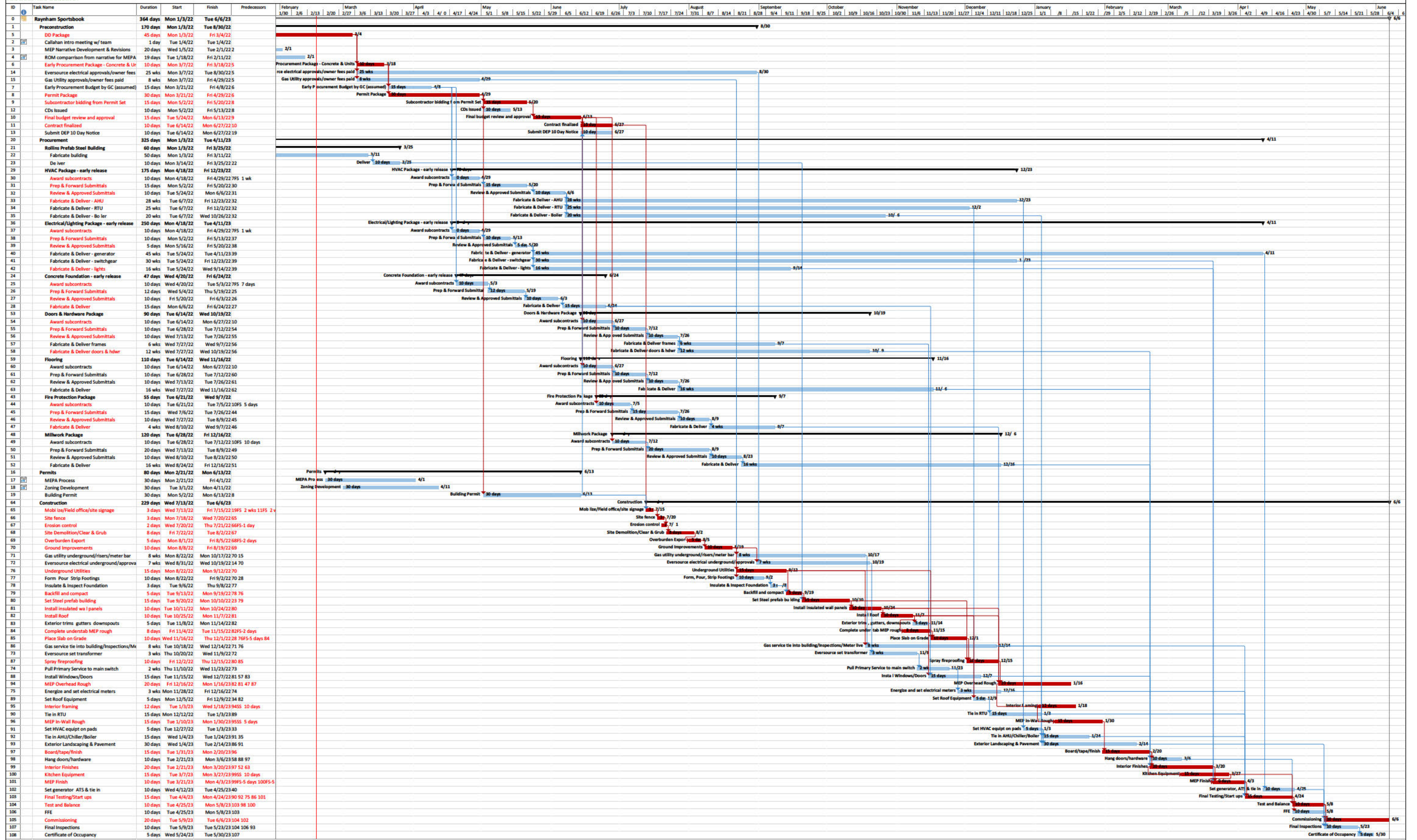
b. A detailed timeline of construction

Please refer to attached Exhibit C.4(b) which outlines the detailed timeline of construction.

MASSASOIT GREYHOUND ASSOCIATION, INC.

APPLICATION FOR SPORTS WAGERING OPERATOR LICENSE

EXHIBIT C.4(b)



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C.4 CONSTRUCTION – LIVE HORSE RACING/SIMULCASTING FACILITY
(Category 2 Applicants Only)

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

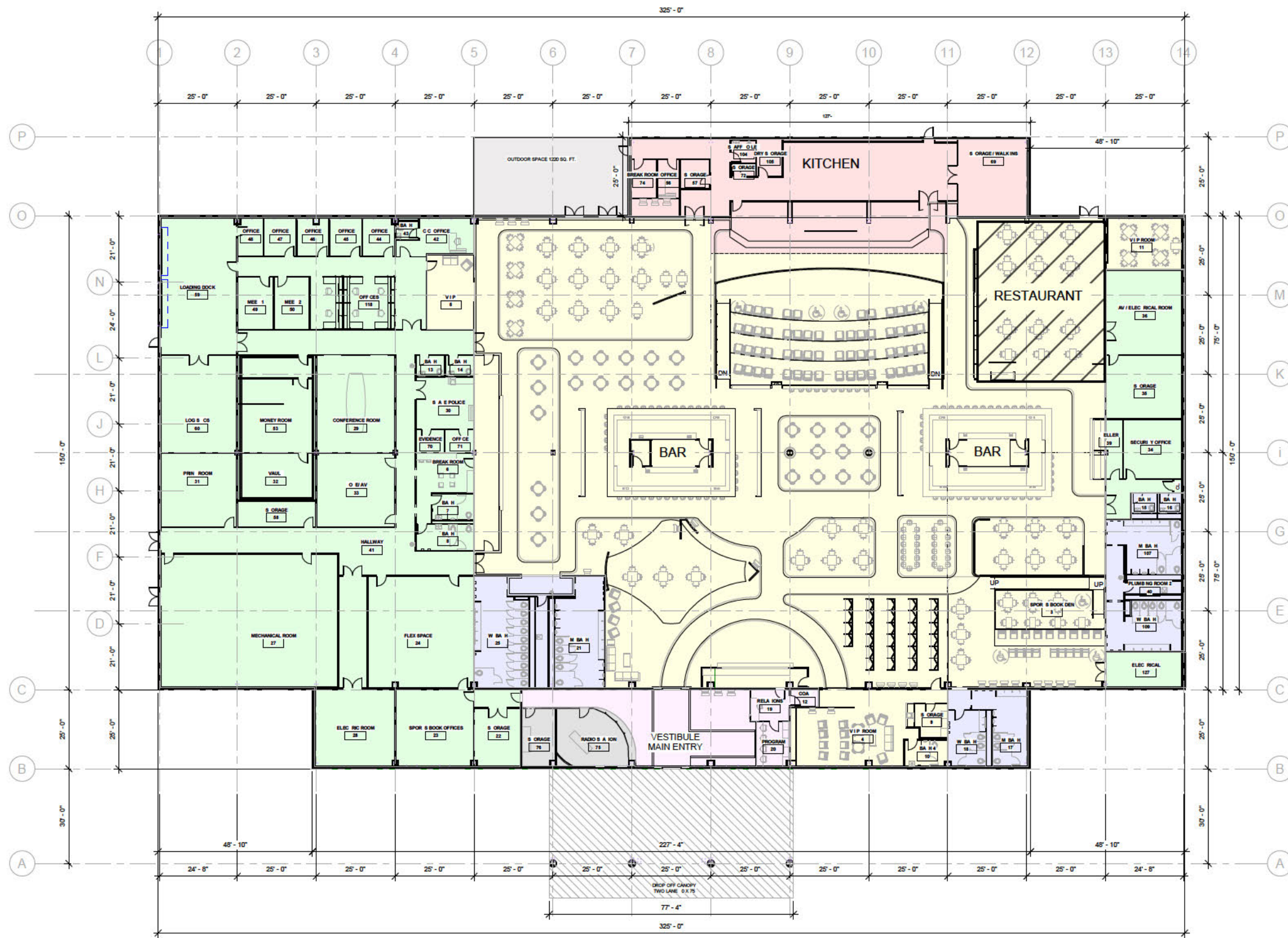
- c. Proposed location of sports wagering area within the facility, including plans for the construction of a new section and/or any potential additions to the facility**

Please refer to attached Exhibit C.4(c) which shows the proposed location of the sports wagering area within our new facility.

MASSASOIT GREYHOUND ASSOCIATION, INC.

APPLICATION FOR SPORTS WAGERING OPERATOR LICENSE

EXHIBIT C.4(c)



- = LOBBY: 1,470 SQUARE FEET
- = PUBLIC / GAMING FLOOR: 29,305 SQUARE FEET
- = RESTROOMS: 3,245 SQUARE FEET
- = STAFF / BACK OF HOUSE: 18,100 SQUARE FEET
- = KITCHEN / CAFE: 3,965 SQAURE FEET
- = RADIO / STUDIO: 610 SQUARE FEET

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C.4 CONSTRUCTION – LIVE HORSE RACING/SIMULCASTING FACILITY
(Category 2 Applicants Only)

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

d. Approximate square footage of the sports wagering area

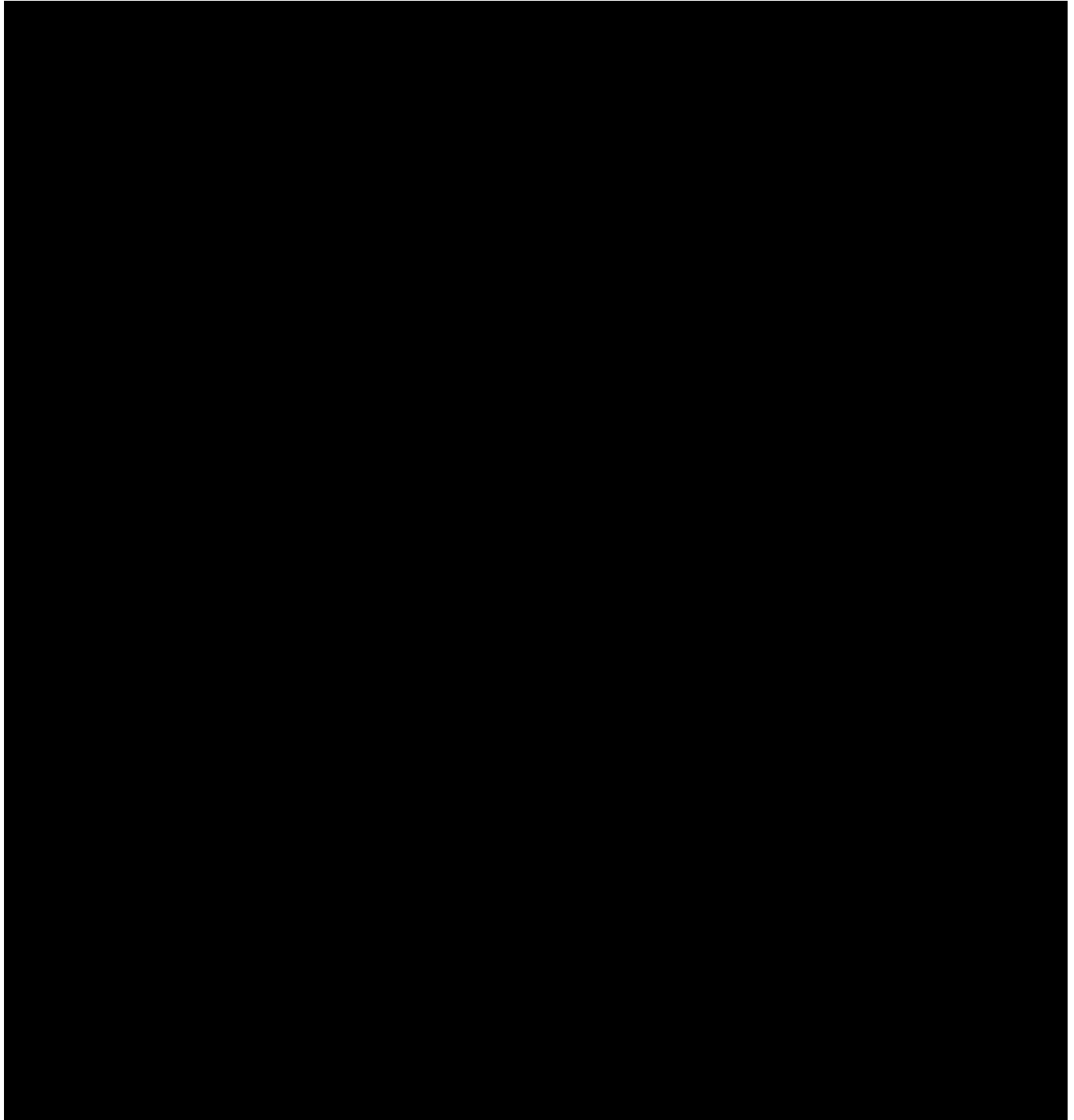
Approximate square footage of the sports wagering area in our new facility is 30,000 square feet. Please refer to attachment Exhibit C.4(c) and note that the designated sports wagering area is colored in yellow.

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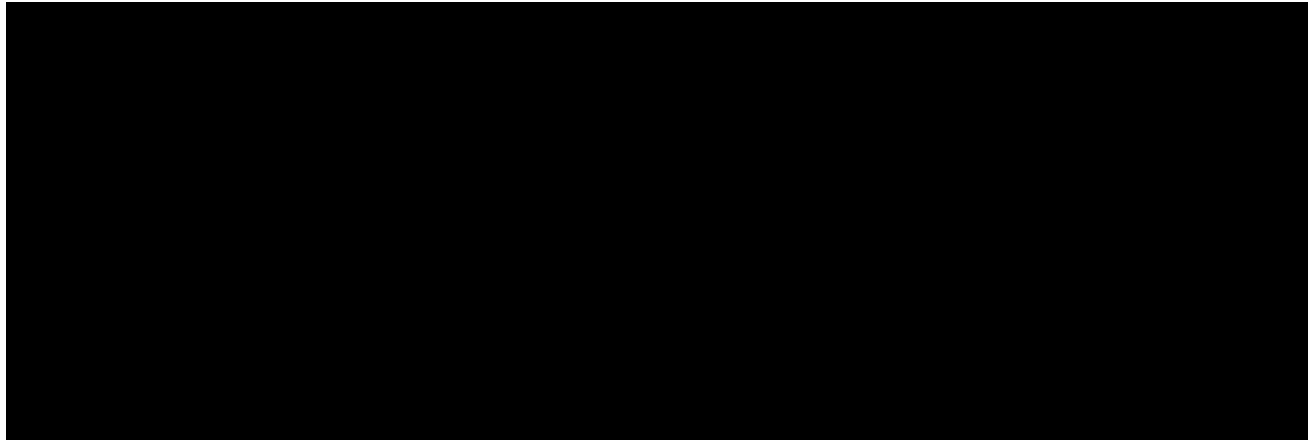
C.4 CONSTRUCTION – LIVE HORSE RACING/SIMULCASTING FACILITY
(Category 2 Applicants Only)

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

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



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MASSASOIT GREYHOUND ASSOCIATION, INC.

APPLICATION FOR SPORTS WAGERING OPERATOR LICENSE

EXHIBIT C.4(e)

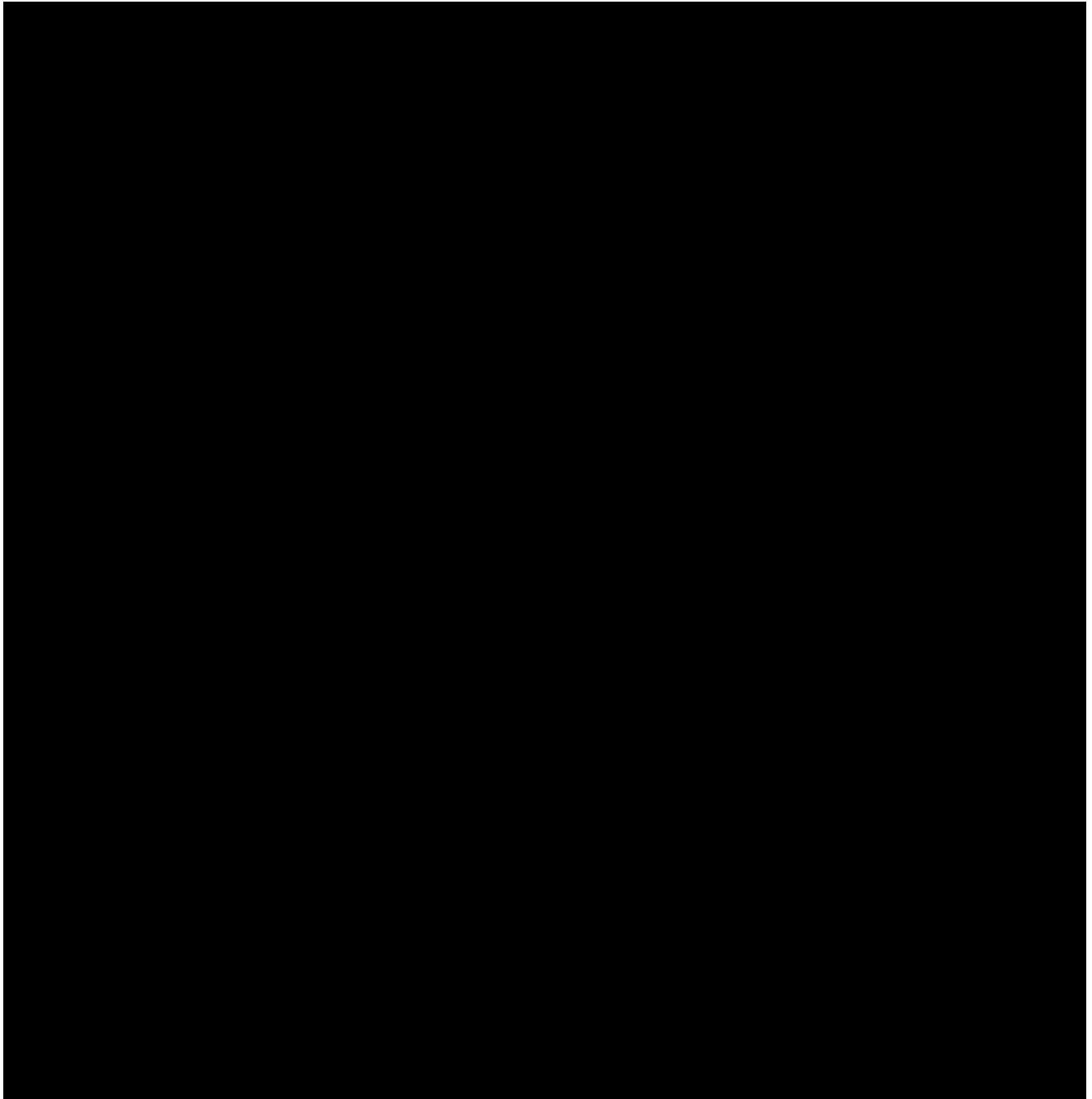


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C.4 CONSTRUCTION – LIVE HORSE RACING/SIMULCASTING FACILITY
(Category 2 Applicants Only)

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

- f. Proposed security and surveillance of the sports wagering area and operation and how the applicant intends to prevent wagering by prohibited persons, including underage persons, problem gamblers, employees, etc.**

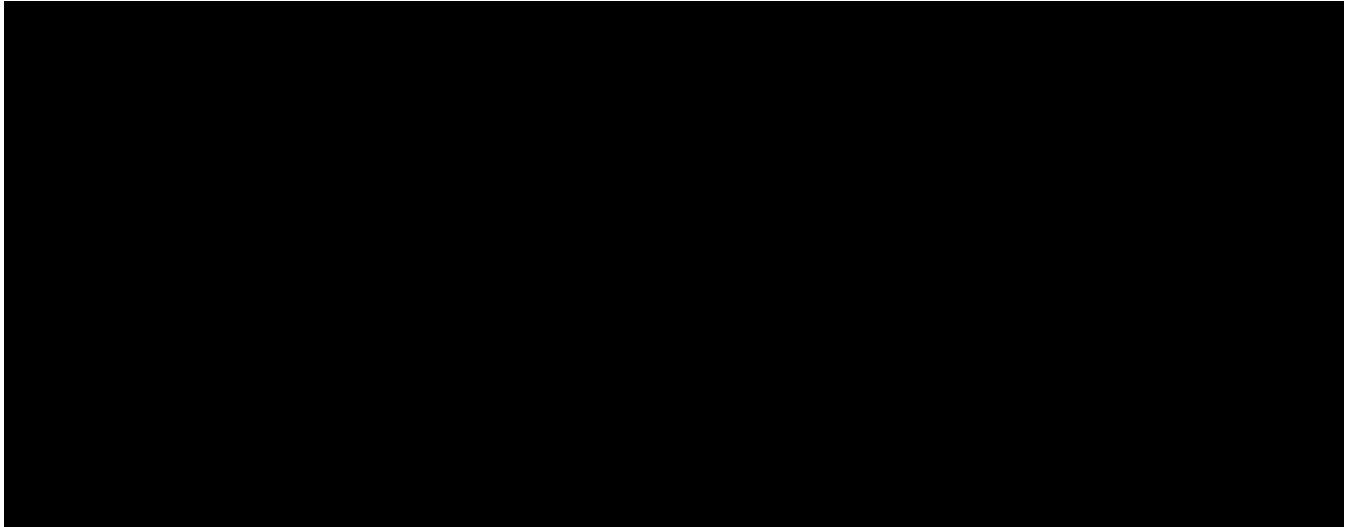


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C.4 CONSTRUCTION – LIVE HORSE RACING/SIMULCASTING FACILITY
(Category 2 Applicants Only)

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

- g. Reasonable measures the applicant will take to ensure the safety and security of all employees and patrons of any sport wagering-related events**



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C.4 CONSTRUCTION – LIVE HORSE RACING/SIMULCASTING FACILITY
(Category 2 Applicants Only)

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

- h. 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**

As set forth above, Raynham Park will be an over 21 facility. Patrons of Raynham Park will have a single point of entry and exit from the facility. This will enable security staff to properly identify patrons upon entry. The entrance will be staffed by the security team and validate identification, visually and electronically (by means of an electronic identification scanner). This will also allow the security team to monitor the volume of patrons inside the facility. Raynham Park will have the ability to seat approximately 800 patrons, with a 2,200-patron capacity. The sidewalks, entrance doors, interior space, and restrooms, will be ADA compliant. The parking lot will host 441 parking spaces, 16 of which will be handicap accessible parking spaces, exceeding the local code requirement. Raynham Park will provide Valet parking. There will be 2 traffic lanes of entrance from State Route 138 into the parking lot and 2 traffic lanes to exit onto State Route 138. MA DOT has approved a traffic signal to be located on State Route 138, at our entrance, which we will provide.

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C.4 CONSTRUCTION – LIVE HORSE RACING/SIMULCASTING FACILITY
(Category 2 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 ticket window(s)

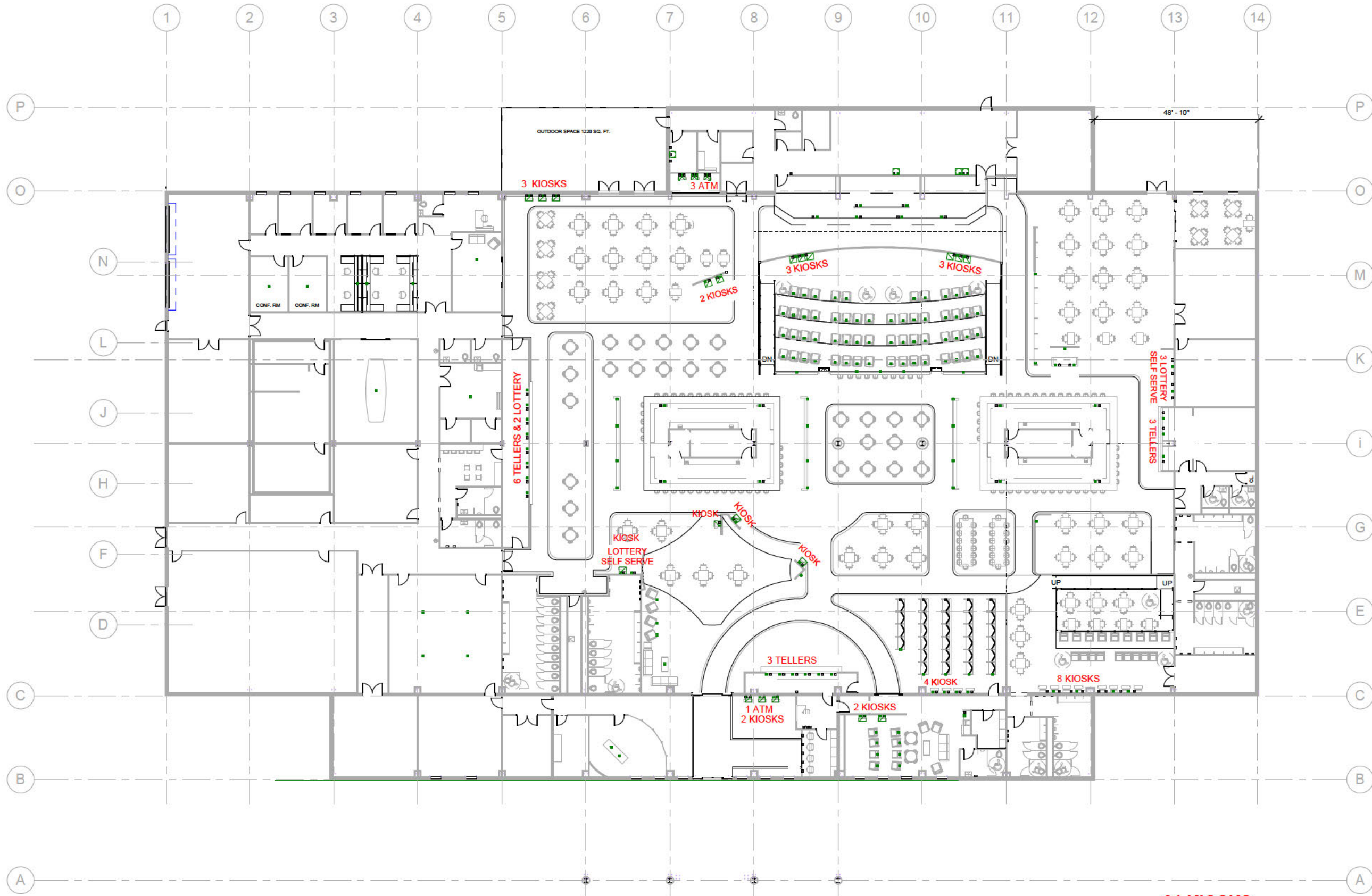
Please refer to Exhibit C.4(i) which outlines the proposed locations of betting windows.

Caesars Sportsbook plans to install and operate at least five (5) betting windows at the sportsbook.

MASSASOIT GREYHOUND ASSOCIATION, INC.

APPLICATION FOR SPORTS WAGERING OPERATOR LICENSE

EXHIBIT C.4(i)



31 KIOSKS

12 TELLERS

6 LOTTERY

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C.4 CONSTRUCTION – LIVE HORSE RACING/SIMULCASTING FACILITY
(Category 2 Applicants Only)

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

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

Please refer to Exhibit C.4(i) which outlines the proposed locations of self-service wagering kiosks.

Caesars Sportsbook plans to install and operate at least twenty (20) self-service kiosks at the retail sportsbook and in permitted areas of Raynham Park.

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C.4 CONSTRUCTION – LIVE HORSE RACING/SIMULCASTING FACILITY
(Category 2 Applicants Only)

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

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

All wagers will be electronically displayed on the message boards located behind the tellers, on the same displays where the betting odds are located. Also, all wagers will be displayed on printed betting sheets available to all patrons.

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C.4 CONSTRUCTION – LIVE HORSE RACING/SIMULCASTING FACILITY
(Category 2 Applicants Only)

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

1. Location of posting of house rules

The “House Rules” will be located on each self-service betting kiosk and available on a printed sheet through any sportsbook staff member.

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C.4 CONSTRUCTION – LIVE HORSE RACING/SIMULCASTING FACILITY
(Category 2 Applicants Only)

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

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

Raynham Park will offer food and beverage to all its patrons. The facility will host 2 bars which can each seat 50 patrons, respectively, with food and all beverage options. All other seating will have wait staff assigned, and the same food and beverage options will be offered. The facility will also offer a walk-up counter service that will serve the same food but with non-alcoholic beverages options. Raynham Park will include a fine-dining restaurant which will have the ability to seat 104 patrons.

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C.4 CONSTRUCTION – LIVE HORSE RACING/SIMULCASTING FACILITY
(Category 2 Applicants Only)

Capital Investment

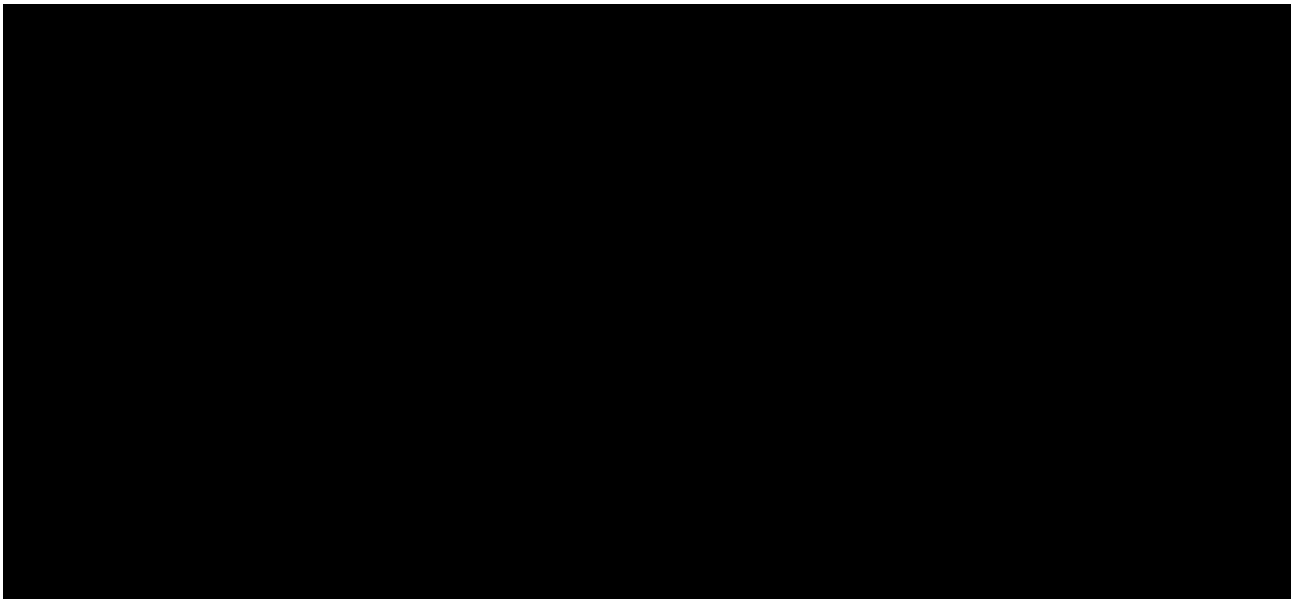
In accordance with G.L.c.23N, §3, Category 2 licenses shall make a capital investment of not less than \$7,500,000.00 within 3 years after receiving a sports wagering license, which the applicant must agree to expend.

Please provide a thorough description, including the following:

n. How the applicant proposes to realize the required capital investment

Raynham Park's capital investment is currently underway on a 13-acre parcel located on our current 100 plus-acre site. Construction has already begun on a 58,900 square foot facility. The sole purpose of this new facility will be to operate a sportsbook under a Category 2 license. This facility would handle all sports wagering and pari-mutuel simulcast wagering.

Raynham Park will exceed the required capital investment of not less than \$7,500,000.00 within the first six months of obtaining a Category 2 Sports Wagering operator license. Following is a list of capital expenditures already incurred:



This brings Raynham Park's realized capital investment, as of December 30, 2022, to [REDACTED]. Raynham Park has committed to additional capital expenditures of [REDACTED], which will complete the new facility.

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C.4 CONSTRUCTION – LIVE HORSE RACING/SIMULCASTING FACILITY
(Category 2 Applicants Only)

Capital Investment

In accordance with G.L.c.23N, §3, Category 2 licenses shall make a capital investment of not less than \$7,500,000.00 within 3 years after receiving a sports wagering license, which the applicant must agree to expend.

Please provide a thorough description, including the following:

- o. The financial commitments and guarantees the applicant is prepared to provide the Commission**

Please see answer to C.4.(n) above. The Company will exceed Chapter 23N's capital requirement for Category 2 Licensees within 6 months of licensure and upon completion of its sportsbook facility, Raynham Park will have invested almost 3 times the required amount.

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C.4 CONSTRUCTION – LIVE HORSE RACING/SIMULCASTING FACILITY
(Category 2 Applicants Only)

Capital Investment

In accordance with G.L.c.23N, §3, Category 2 licenses shall make a capital investment of not less than \$7,500,000.00 within 3 years after receiving a sports wagering license, which the applicant must agree to expend.

Please provide a thorough description, including the following:

- p. How the applicant will ensure that the project is completed, the license conditions are fulfilled, and sufficient working capital is available to allow operation in the promised fashion**

Please see answer to question C.4(n) above. To finalize the project, upon licensure, MGA will obtain the financing needed to complete the building. In addition, MGA expects to have access to additional capital as the result of the sale of a majority of the Raynham Park dog track parcel (exclusive of the sports betting facility). This transaction is scheduled to close in the second or third quarter of 2023.

Notwithstanding Raynham Park's access to capital, the Operating Lease Agreement between Caesars Sportsbook and MGA provides that Caesars Sportsbook will provide the needed working capital for operation of the sportsbook. See Exhibit B.1(c).

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C.4 CONSTRUCTION – LIVE HORSE RACING/SIMULCASTING FACILITY
(Category 2 Applicants Only)

Capital Investment

In accordance with G.L.c.23N, §3, Category 2 licenses shall make a capital investment of not less than \$7,500,000.00 within 3 years after receiving a sports wagering license, which the applicant must agree to expend.

Please provide a thorough description, including the following:

- q. Any mitigation measures the applicant will take to reduce any impact on the local community**

Raynham Park has maintained a close, valued relationship with the local community since 1966, when Mr. George L. Carney Jr. took over the ownership and operations of Raynham/Taunton Greyhound Park. When planning the construction of our new facility, Raynham Park included design and layouts that will mitigate impacts to our surrounding neighbors and community:

- The location is back from any residential neighbors.
- Engineering of all site lighting will meet and exceed the regulations regarding light pollution.
- Entrance and exit driveways were purposely designed to exceed 1200 feet in length (actual length is 1500 feet in length) in order to prevent any traffic backing onto to Broadway.
- Contingent upon Massachusetts Department of Transportation approval, Raynham Park will provide at traffic signal at the entrance and exit, on Broadway, to ensure safe travel transitions on and off property. This will mitigate impacts on plausible traffic accidents.
- Staffing a police detail on site during hours of operation.
- Staffing a fire department detail (EMT) on site during hours of operation.
- Contingent upon completion of the redevelopment project at Raynham Park, \$250,000.00 will be donated to the Raynham Fire Department for the purchase of an emergency vehicle.
- Contingent upon completion of the redevelopment project at Raynham Park, \$50,000.00 will be donated to the Raynham Police Department for the purchase of an emergency vehicle.

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**

In addition to leveraging Caesars Entertainment Group's national initiatives such as "Together We Win," Raynham Park will continue its valued membership with the Taunton Area Chamber of Commerce and strengthen our current local business relationships. We will also broaden our community outreach to develop new partnerships. This initiative will include a membership with the Metro South Chamber of Commerce and outreach to the Regional Tourism Councils to have our business added as a link on their website.

Caesars Sportsbook's ultimate parent company, Caesars Entertainment, Inc. ("Caesars Entertainment"), aims to be an integral part of the communities Caesars Entertainment is privileged to serve. Caesars Entertainment plays a role in civic life by advancing economic and social development in its communities in ways that help make its communities stronger and more resilient. Caesars Entertainment's core value of Together We Win inspires the Company to consider the needs of the communities in which Caesars Entertainment operates and provides financial support to combat social inequities and help communities thrive. For decades, Caesars Entertainment has regularly supported communities through civic engagement, strategic philanthropy and Team Member volunteering. Its engagement is demonstrated in three ways:

- Social contribution: Involvement in civic life and support for local development, including programs to accelerate economic development in partnership with local municipalities or nonprofits.
- Corporate reinvestment: Providing financial gifts to diverse local communities to help address social needs through its Caesars Foundation and property giving.
- Volunteering activities: Caesars Entertainment's Team Member volunteers (HEROs) contribute hundreds of thousands of hours each year to support the communities they care about and help alleviate local hardships.

In 2021, Caesars Entertainment's total community reinvestment amounted to over \$74.5 million. This total figure includes more than \$69 million in mandated and discretionary giving by the Company, \$1.6 million as the value of over 55,000 hours of Team Member volunteering in 2021, more than \$2 million contributed through its Caesars Foundation and additional in-kind giving amounting to nearly \$1.5 million.

Corporate Reinvestment

Caesars Entertainment believes in strategic philanthropy, that drives lasting change rather than simply plugs a gap. Caesars Entertainment works year after year with its signature nonprofit partnerships to

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achieve this through the Caesars Foundation and other corporate giving. Since its inception in 2002, Caesars Foundation has gifted more than \$78 million to help older individuals live more fulfilling lives, promote a more sustainable world and support educational initiatives with several strategic partnerships, including Boys & Girls Clubs of America, Meals on Wheels America, National Park Trust and Clean the World. In addition to financial giving, thousands of Team Members engage with Caesars Entertainment's strategic nonprofit partners through different volunteering events.

Property Reinvestment

In addition to the strategic funding provided by Caesars Foundation at the national level, all Caesars Entertainment properties engage with local communities to support programs with local relevance.

Social Impact

Caesars Entertainment's aim is to help lift up its most vulnerable and underserved populations through educational programs, tools and platforms and facilitating equitable opportunities to participate in economic life. Caesars Entertainment engages widely with civil rights groups, business associations, national and local chambers of commerce and nonprofits to support inclusion of diverse individuals as guests, customers, business partners and suppliers. Caesars Entertainment's programs typically include scholarship funding, diverse nonprofit partnerships such as 100 Black Men of America, UnidosUS and Disability:IN and its ongoing Economic Equity Tour, as well as partnerships with cities to expand essential services to the most vulnerable. Caesars Entertainment's contributions to Boys & Girls Club of America and its "All-In On Education" program for Team Members also support the Company's social equity and education goals.

In keeping with Caesars Entertainment's People, Planet, Play framework, Caesars Sportsbook is excited to develop new relationships with community, economic development and tourism organizations moving forward.

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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:

- 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**

Raynham Park has been a valued partner with the Massachusetts Lottery since its inception 50 years ago and spent many years as the Massachusetts Lottery's #1 sales agent. Early on, Raynham Park hosted the live Massachusetts Lottery drawings on Saturday nights. We will continue this longstanding partnership and will expand our footprint. Raynham Park will employ specific positions directed at Massachusetts lottery sales. We will have three locations within our new facility for lottery sales, including scratch ticket, daily/weekly games, and Keno. Our facility will host several live Keno display monitors. The gaming floor will also house three self-service lottery scratch ticket terminals, placed in high traffic areas.

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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:

c. Promoting local businesses, including restaurants, hotels, and retail outlets

Raynham Park's construction of its new pari-mutuel simulcast center, and anticipated state-of-the-art sportsbook, will bring in tens of thousands of additional patrons. Our increased business will generate a large increase in supplier goods and services. Primary preference will be given to local, diverse businesses to fulfill these needs. Upon receipt of a Category 2 Sports Wagering operating license, Raynham Park plans to create relationships with a number of area hotels. These relationships will provide patrons easy accessibility for overnight accommodations, if needed. The plan will include discounted hotel rates and transportation to and from Raynham Park. We will also consult with local ride share providers to ensure adequate supply is available and will dedicate pick-up and drop-off locations outside our facility for these services. The anticipated growth of patrons visiting Raynham Park will also provide local restaurants, service stations, and adjacent businesses, an opportunity for increased sales/growth.

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:

d. Cross-marketing with live entertainment venues and/or attractions

In an effort to promote and cross market with live entertainment venues Raynham Park plans to expand promotional packages/giveaways at the following venues:

[REDACTED]

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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:

e. Supporting any community enhancements being incorporated at the local level

The granting of a Category 2 Sports Wagering operating license will provide local community enhancements with increased tax revenue realized by the Town of Raynham through the development of Raynham Parks' new sportsbook facility. A beautification process at our current parcel of land is already underway, beginning with the construction of our brand-new facility, slated to open June 2023. Part of this project includes a donation to the Town of Raynham's police and fire departments for much needed equipment purchases. The completion of our entire project will transform the aesthetics of the former Raynham/Taunton Greyhound Park site. In addition, MGA will leverage Caesars Entertainment Inc.'s national People, Planet, Play initiative.

Caesars Sportsbook participates in its ultimate parent company's, Caesars Entertainment, Inc., People, Planet, Play initiative, which focuses on driving partnerships with local economic development and tourism agencies in the jurisdictions in which Caesars Sportsbook operates. In particular, Caesars Sportsbook is developing a relationship with the Massachusetts Military Support Foundation (the "MMSF"). The MMSF provides programs, services and goods that help satisfy critical needs and enhance the well-being and quality of life for veterans, active-duty military and their families in the Commonwealth. Additional information on the MMSF mission can be found at <https://mmsfi.org/>. Caesars Sportsbook will also support organizations that provide responsible gaming services to the Commonwealth such as the Massachusetts Council on Gaming and Health. Caesars Sportsbook is excited to develop additional relationships in Massachusetts and support additional community engagement moving forward.

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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:

- f. Highlighting unique business and marketing strategies to draw new revenues from new customers**

By obtaining a sports wagering license, Raynham Park will be the only sports wagering facility in Region C licensed by the Commission. Raynham Park is uniquely positioned to attract patrons from southeastern Massachusetts, including being the closest licensed sportsbook to Cape Cod. Raynham's partnership with Caesars Sportsbook only enhances Raynham's potential to attract new customers. [REDACTED]

[REDACTED]

[REDACTED]

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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 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***

Raynham Park is a small, family-owned business. As set forth in section C.1(a) Raynham Park currently has ■ full-time employees and ■ part-time employees. The Company’s diversity efforts and compliance with equal opportunity hiring and anti-discrimination laws are the general responsibility of Raynham Park’s management. Under MGA’s new Equal Opportunity Policy, the Director of Human Resources is responsible for MGA’s diversity, equity and inclusion efforts. The Director of Human Resources reports to Raynham Park’s CFO. See Policy in section D.1(b) below.

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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 proposed entity within the Commonwealth. The information must include:

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

Raynham Park has been a welcoming employer for over 50 years in the Brockton-Taunton Area. It prides itself on a workforce that on average has worked for the company for more than 22 years – its longest serving employee has been with Raynham for over 50 years. While the Company has not historically tracked the diversity of its workforce or had a formal diversity program in place, females comprise [REDACTED] of the workforce and [REDACTED] are aged 55 or older. The Company approximates that it has between [REDACTED] of its workforce that are minority.

In connection with being licensed as a Category 2 sportsbook operator, Raynham Park has an opportunity to [REDACTED]. In connection with this hiring effort, the Company will adopt an Equal Opportunity Hiring Policy, and Raynham Park will make best efforts to increase diversity-candidate hiring and establish goals based on the Company’s size as it simply makes good business sense to make Raynham Park a welcoming venue for everyone. These Company will keep the Commission apprised as these goals are developed and its best efforts to meet these goals.

In addition, Raynham Park will implement the following Equal Opportunity and Anti-Harassment Employment Policy:

DIVERSITY, EQUITY & INCLUSION

Raynham Park (the “Company”) is committed to diversity, equity and inclusion in all aspects of its business, and in furtherance of its commitment, the Company has developed the following policies.

Equal Employment Opportunity

Raynham Park is committed to providing equal employment opportunity to all applicants and employees, without regard to race, color, religion, national origin, sex stereotype, sex (including pregnancy, childbirth, or related medical conditions), gender identity, gender expression, sexual orientation, age, marital, military or veteran status, physical or mental disability, or any other protected characteristic under applicable federal, state, and local law. All employment decisions are based on qualifications, merit, and business need. In accordance with applicable law, the Company will also make reasonable accommodations for qualified applicants or employees with a known disability, where such accommodation will enable the individual to perform the essential functions of such individual’s position, unless doing so would result in an undue hardship. Individuals who may require an accommodation in order to perform the essential functions of a job should speak with Human Resources regarding the potential need for an accommodation.

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Harassment, Discrimination, and Retaliation Prevention

As an equal opportunity employer, the Company is committed to providing a work environment free of harassment, discrimination, and retaliation, on the basis of any protected characteristic under applicable federal, state, and local law. The Company prohibits unlawful discrimination or harassment based on race, color, religion, national origin, sex stereotype, sex (including pregnancy, childbirth, or related medical conditions), gender identity, gender expression, sexual orientation, age, marital, military or veteran status, physical or mental disability, or any other protected characteristic under applicable federal, state, and local law. Furthermore, the Company prohibits and will not tolerate retaliation against any employee for making a good faith complaint of discrimination or harassment, or for participating in an investigation of such a complaint. Harassment, discrimination, and retaliation for opposing harassment or discrimination, or for participating in an investigation of the same, are illegal.

Prohibited harassment can take many forms, including, but not limited to, cartoons or other visual displays of objects, pictures or posters that depict persons with protected characteristics in a derogatory ways; and verbal conduct such as epithets, derogatory jokes or comments, slurs or jokes towards persons with protected characteristics.

Sexual harassment is a form of prohibited harassment and is not tolerated. It is generally defined as unwelcome sexual advances, requests for sexual favors, or other visual, verbal, or physical conduct of a sexual nature when:

- Submission to such conduct is made either explicitly or implicitly a term or condition of employment;
- Submission to or rejection of such conduct affects employment opportunities; or
- The conduct interferes with an employee's work or creates an intimidating, hostile, or offensive work environment.

Sexual harassment includes harassment based on another person's gender or harassment based upon pregnancy, childbirth, or related medical conditions. It also includes harassment of another employee of the same gender as the harasser. Sexual harassment need not be motivated by sexual desire. Examples of sexual harassment include, but are not limited to, any unwelcome sexual advances, visual conduct (such as leering, making sexual gestures, or displaying sexually suggestive material in the workplace), verbal conduct (such as derogatory comments, slurs, or sexual jokes), or physical contact (such as rubbing, inappropriate touching, and assault).

The Company is committed to taking reasonable steps to prevent harassment, discrimination, and retaliation from occurring and will take immediate and appropriate action when it knows that prohibited harassment, discrimination, or retaliation has occurred. To achieve this, the Company encourages all individuals to immediately report any incidents of suspected harassment, discrimination, or retaliation. Employees who believe they have been the subject of harassment, discrimination, or retaliation, or who have witnessed harassment, discrimination, or retaliation, may bring their complaint to their supervisor, another supervisor at the Company or to Human Resources.

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Equal Opportunity Hiring

As part of its efforts to ensure equal employment opportunity to all individuals, Raynham Park has designated specific responsibilities to various staff. To that end, the President, the Director of Human Resources and those employed as supervisors and managers have the responsibilities described below.

Chief Financial Officer

The primary responsibility and accountability for implementing the equal employment opportunity policy rests with the Chief Financial Officer. This person is responsible, through the Director of Human Resources, for adherence to the Company's policy of equal employment opportunity. This role includes, but is not limited to, the following duties:

1. Designate appropriate personnel with the responsibility for overseeing, administering, implementing, and monitoring the Company's equal employment opportunity policy.
2. Ensure that those designated personnel responsible for all components of the equal employment opportunity policy are given the necessary authority and top management support and staffing to successfully implement their assigned responsibilities.
3. Impart the personal direction that ensures total involvement and commitment to equal employment opportunity programs.

Director of Human Resources

The Director of Human Resources is responsible for overall supervision of the equal employment opportunity policy. The Director of Human Resources ensures, through department managers and supervisors, that all relevant policies and procedures are adhered to. The Director of Human Resources' responsibilities include, but are not limited to, the following:

1. Ensure that the Company adheres to the stated policy of equal employment opportunity and monitor the application of equal employment opportunity policies.
2. Participate in periodic discussions with management, supervision, and other personnel to ensure equal employment opportunity policies are being followed.
3. Review the qualifications of all employees to ensure equitable opportunity, based on job-related employment practices, is given to all for transfers and promotions.
4. Conduct periodic audits of: 1) training programs and hiring and promotion patterns to remove impediments to the attainment of goals and objectives, 2) facilities to ensure they are maintained for the use and benefit of all employees and integrated both in policy and practice, and 3) sponsored educational, training, recreational, and social activities to ensure that all employees are encouraged to participate in accordance with policies on non-discrimination.
5. Ensure that all new employees receive an orientation to the Company's equal employment opportunity policy.

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6. Ensure that recruitment advertising is placed in minority and female oriented publications, as applicable.
7. Review all job descriptions and specifications to ensure they are free of discriminatory provisions and artificial barriers. Ensure that all requirements are job-related, that they are realistic, and that they reflect the actual work requirements of the essential job duties.

Managers and Supervisors

In their direct day-to-day contact with employees, managers and supervisors have certain responsibilities to help the Company ensure compliance with equal employment opportunity programs. These include, but are not limited to, the following:

1. Aggressively adhere to Company's equal employment opportunity policy.
 - A. Support and assist the Director of Human Resources in developing, maintaining, and successfully implementing the equal employment opportunity policy.
 - B. Complete progress reports regarding the status of goal achievement.
 - C. Take action to prevent harassment of employees.
2. Ensure that all interviews, offers of employment and/or wage commitments are consistent with the equal employment opportunity policy.

A copy of Caesars Entertainment Inc.'s diversity, equity, and inclusion policy can be found at the below link:

<https://www.caesars.com/corporate-social-responsibility/social-programs/investment-in-team-members/diversity-equity-and-inclusion>

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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 proposed entity within the Commonwealth. The information must include:

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

Raynham Park has not historically tracked the diversity of its workforce or had a formal diversity program. There are currently [REDACTED] employees supporting Raynham Park operations, of which [REDACTED] are full-time and [REDACTED] are part-time. Based on current records, females comprise [REDACTED] of the workforce and [REDACTED] are males. Of those employed, [REDACTED] are aged 55 or over. While minority workforce statistics have historically not been tracked, Raynham Park estimates that its current workforce is between [REDACTED] minority.

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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 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**

Raynham Park will utilize state, local, and non-profit organizations in the Brockton-Taunton area which serve as recruiting sources for qualified minorities, women, persons with disabilities, and veterans and resources available through the Commonwealth Office of Labor and Workforce Development. In addition, Raynham Park will work with the Cities of Brockton and Taunton to recruit minority, women and veteran staff.

As set forth in section C above, Raynham Park will advertise available job opportunities in all local news outlets (e.g., *Brockton Enterprise*, *Taunton Gazette*, *The Sun Chronicle*). We will work with local town and city groups to promote employment opportunities with us.

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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 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 initiative**

Raynham Park as a small family-owned business has historically not had the resources to commit to such organizations. There are surprisingly few resources or organizations that focus on DEI initiatives for small businesses despite the fact that small businesses comprise a majority of employers. Raynham Park will continue to explore what opportunities it may have to participate in small business DEI-oriented programs through local chambers of commerce or other small business organizations, the Office of Labor and Workforce Development as well as US Small Business Association.

Caesars Sportsbook participates with several organizations through Caesars Entertainment’s many partnerships. For a list of the many organizations Caesars Entertainment, Inc. partners with and the work that has been done with them, please see pages 28-35 of the Corporate Social Responsibility Report in the following link:

<https://eldorado-assets.s3.us-west-2.amazonaws.com/csr-reports/2021-2022+CSR+Report.pdf>

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:

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

Please include how each of these enterprise groups 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**

Raynham Park will continue its work to use diverse suppliers for Raynham Park. This includes best efforts to use Minority, Women and Veteran owned businesses to supply the new sportsbook facility. Raynham Park will use best efforts to procure [REDACTED] of goods and services for Raynham Park from women and minority owned businesses and [REDACTED] from veteran owned businesses.

While dollar amounts are not yet ascertainable for vendor spend, Raynham Park has identified the following vendors that it intends to contract with if awarded a sports wagering license:

1. [REDACTED]
2. [REDACTED]

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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***

Raynham Park is a family-owned business. Raynham Park’s management identifies as Caucasian and approximately [REDACTED] female. Through expansion, Raynham Park looks forward to the opportunity to consider diversity of its management through the creation of new management-level positions as its sportsbook grows.

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**

Raynham Park will engage in identifying agencies and non-profit organizations, in Raynham and surrounding communities, who will share a commitment to diversity and inclusion. We are confident that the anticipated growth of our company and our location will allow us to support a number of diversity and inclusion initiatives in the Commonwealth. Through these initiatives and partnerships, we will create welcoming and inclusive experiences for our employees and patrons and while building awareness.

More specifically, Raynham park will turn to the City of Brockton as partner, a city that is majority minority which under the Leadership of Mayor Sullivan has focused on Diversity Equity and Inclusion. Raynham Park will also look to business groups and associations and participate in these organizations Diversity Equity and Inclusion programs such as the South Shore Chamber of Commerce and Metro South Chamber of Commerce which holds an annual multicultural business forum.

In addition, Raynham Park will look for opportunities to directly sponsor events that promote diversity in our communities such as the Brockton’s annual Haitian Flag Day celebration recognizing the strong Haitian community in the greater Brockton Area as well as celebrations of LGBTQIA through the City of Brockton’s Pride Month Celebration as well as the City’s Transgender Awareness Week. As Raynham Park grows so will its commitment to investing in community diversity programs and events.

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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

For almost 60 years under the stewardship of George Carney Jr., Raynham Park has operated considering the social, economic and environmental impacts of its business. To this end, Raynham Park has maintained a safe and healthy working environment where employees average over 25 years of service with the Park. Raynham Park has also treated its customers the same way ensuring that use of its facility and simulcast betting is fun and recreational. At the core of its relationship with its patrons is responsible gaming, something that the Company plans to continue and become a leader on in the retail sports wagering market. Raynham Park's is also committed to the environment and is developing its new sportsbook facility using technology and materials that will have the least impact on the environment as well as the residential neighborhood that borders the Park. Finally, Raynham Park has been a supporter of the Community including Raynham's First Responders, and, as part of its new retail sportsbook, plans to increase its reach into the community to support diversity, equity and inclusion in its hiring, supplier spend and community engagement.

Caesars Sportsbook and Caesars Entertainment, Inc. are committed to being a responsible corporate citizen and environmental steward through Caesars' PEOPLE PLANET PLAY framework. This is reflected in Caesars' Code of Commitment, its public pledge to its guests, team members, communities, business partners and all those it reaches through its business. Caesars commits to supporting the wellbeing of all its team members, guests and local communities. Caesars commits to taking care of the world we all call home. Caesars commits to creating memorable experiences for its guests and leading the industry as a responsible business, including Responsible Gaming practices.

Caesars Entertainment, Inc.'s Corporate Social Responsibility Report can be found in the following link:
<https://eldorado-assets.s3.us-west-2.amazonaws.com/csr-reports/2021-2022+CSR+Report.pdf>

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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:

b. Support positive play

Please see answer E.3 below for responsible gaming initiatives. Raynham Park is committed to ensuring the safe and responsible gaming of all patrons and will coordinate with Caesars Sportsbook to incorporate its well-established safeguards for retail sportsbooks.

The longstanding commitment of Caesars Sportsbook and Caesars Entertainment, Inc. to Responsible Gaming and supporting positive play has been accomplished by focusing on the social impact of gambling and upholding the following three conventions to include:

- Prevent problem gambling through our Operations Bets Smart Program;
- Prevent underage gambling through our Project 21 Program; and
- Ensure gambling is conducted in a fair and open way.

Caesars recognizes that for a small portion of its customers, wagering may lead to negative consequences in other areas of their life. Caesars Sportsbook encourages Responsible Gaming for its patrons and team members. For its patrons, Caesars Sportsbook achieves this by offering limit-setting and cool-off capabilities, making problem gambling help resources available in all retail sportsbooks and online, and by educating and offering assistance of a self-exclusion option for both in-house and in local jurisdictions.

Also, Responsible Gaming procedures are integrated into Caesars' customer service practices, so that team members are alerted in circumstances where a customer makes a verbal comment or statement that concerns team members that the customer may not be gambling responsibly.

Responsible Gaming tools to support positive play are always available to customers that recognize "taking a break" is essential to their overall enjoyment of the gaming experience.

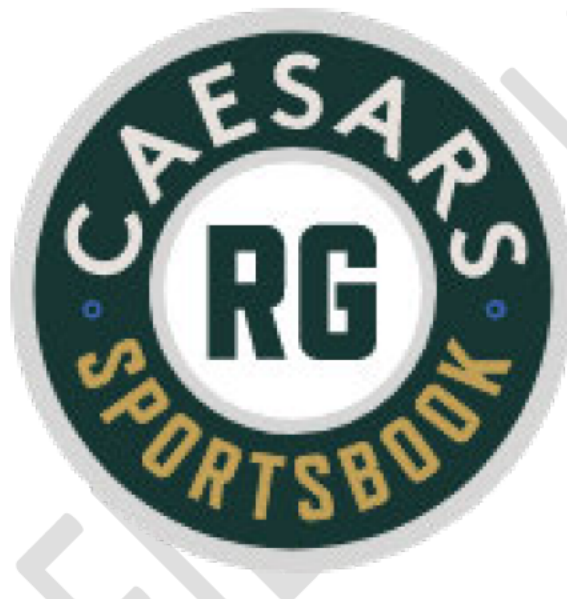
Please exhibit E.1.b, Caesars Sportsbook's Proposed Massachusetts RG Plan – Draft.

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EXHIBIT E.1.b

Responsible Gaming



Massachusetts



[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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CONFIDENTIAL

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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:

c. Promote public health and safety

Please see answer E.3 below for responsible gaming initiatives. Raynham Park is committed to ensuring the safe and responsible gaming of all patrons and will coordinate with Caesars Sportsbook to incorporate its well-established safeguards for retail sportsbooks.

Caesars wants everyone who gambles to do so for the right reason - to simply have fun.

Caesars does not want people who do not gamble responsibly to play at its casinos, racinos, online sportsbook and gambling products, or OTB (off track betting) facilities.

Caesars promotes awareness among its team members and its customers that some people may experience gambling-related problems, and Caesars encourages customers to be aware of when they may not be gambling responsibly. All full-time and part-time team members receive Responsible Gaming awareness and education training.

The training provides an overview of Caesars' commitment and leadership on Responsible Gaming and an overview of problem gambling that emphasizes its causes, the impacts it can have on individuals and their families, and help resources that are available to people who may have a gambling problem.

Specialized and advanced training is also offered to team members who assume the role and duties of a Responsible Gaming Ambassador. The training is highly interactive, requiring role-playing and discussions about how to handle various scenarios that may unfold. The training covers how and when to conduct Responsible Gaming conversations with customers, and how to utilize the Responsible Gaming information technology tools that are available to customers.

Caesars also implemented a Code of Commitment, a set of guiding principles on how it conducts business, and adopted the Marketing and Advertising Code, which comprise of guidelines to ensure the company promotes and markets its products and services in a responsible manner.

Please see Exhibit E.1, Caesars Sportsbook's Proposed Massachusetts RG Plan – Draft.

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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:

d. Ensure responsible advertising and marketing

Raynham Park will ensure that all advertising adheres to Chapter 23N's requirements and any regulations or advertising policies implemented by the Commission. For additional details on Caesar Sportsbook's commitment to responsible marketing and advertising, please see responses to question E.2(d) – (f) below.

Caesars Sportsbook will ensure that all advertising, public relations activities, and marketing campaigns do not:

- a) Contain false or misleading information;
- b) Fail to disclose conditions or limiting factors associated with the advertisement;
- c) Use location, lighting, illustration, graphic depiction or color obscuring conditions or limiting factors associated with the advertisement;
- d) Consist of indecent or offensive graphics or audio, or both;
- e) Target players who have been excluded from play;
- f) Target, either via content or placement, those under the age of twenty-one (21);
- g) Target groups of people that are considered moderate and high-risk groups for a gambling disorder;
- h) Encourage players to chase their losses or re-invest their winnings; or
- i) Suggest that betting is a means of solving financial problems.

Caesars Sportsbook agrees to delete or modify any advertisement which does not conform to the requirements of the Massachusetts Gaming Commission or is necessary for the immediate preservation of the public peace, health safety, and welfare of Massachusetts residents.

Further, Caesars Sportsbook is truthful and non-deceptive in all aspects of its business practices including its interactive gaming advertising and promotions and will clearly and concisely explain the terms of its promotions on <https://caesars.com/sportsbook-and-casino/> and adhere to such terms.

Caesars Sportsbook has set standards and procedures that allow a patron to be removed from its direct mail and other direct marketing regarding betting opportunities at its retail sportsbooks and online.

Caesars Sportsbook will ensure the following language is added to its customer-facing materials including all print, billboard, signage, online, or broadcast advertisements of a sports pool or online sports pool.

“Must be 21 or older to gamble. Know When To Stop Before You Start.® Gambling Problem? Call or text 1-800-327-5050.”

Caesars Sportsbook shall keep a record of everyone whose name is on the Massachusetts Gaming Commissions VEP List (“List”). Caesars Sportsbook will maintain the confidentiality of the information contained in the List. The List will be maintained internally and not be disseminated outside the company

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except to effectuate removing those persons on the List from mailing lists, and direct marketing or advertising.

All marketing material is reviewed by Caesars Sportsbook's legal and marketing teams with any questions to the compliance team prior to dissemination.

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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:

e. Manage high-risk financial transactions

Through the Operating Lease Agreement, Caesars Sportsbook will monitor all transactions and ensure compliance with anti-money laundering and any other Bank Secrecy Act requirements on behalf of Raynham Park.

Caesars maintains a comprehensive risk based BSA/AML program that includes strong governance and effective internal controls and procedures to comply fully with applicable BSA requirements, regulatory guidance, and any related state or tribal laws, and to take measures reasonably designed to prevent its affiliated casinos from being used for money laundering or other criminal activity. Caesars maintains, in its suite of overarching compliance programs, detailed policies that include the Caesars AML Policy and Program, Caesars BSA Identification Recordkeeping Policy, Caesars KYC Policy and Program, Caesars OFAC Policy and Program, and the Caesars BSA/AML Discipline Policy.

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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:

f. Engage the community

Raynham Park's engagement with the Community in connection with responsible gaming will be achieved through its use of GameSense or other responsible gaming vendor and materials on premise. *See* Response to Answer E.3(a) below. In addition in all promotional materials, Raynham Park will ensure that the required responsible gaming information is provided – this includes all promotional material for the Raynham Park. *See* Response E.2(d)-(f) below.

Caesars has been a proactive supporter and advocate of Responsible Gaming for over three decades. Caesars supports industry-wide awareness and educational programs such as Responsible Gambling Education Month (RGEM, formerly RG Education Week) every year and Problem Gambling Awareness Month (PGAM) hosted by the National Council on Problem Gambling, and engage widely with regulators, industry associations and other groups to address and advance Responsible Gaming. Caesars' leadership participates at Responsible Gaming events and serve on Boards, Working Groups and Committees of various NGOs devoted to Responsible Gaming.

Caesars has continuously partnered with organizations and research institutions that advance Responsible Gaming practices and programs. For example, Caesars is an original supporter of the International Center for Responsible Gaming (ICRG, formerly the National Center for Responsible Gaming (NCRG)).

In 2022, the Caesars Foundation committed \$200,000 to ICRG during Problem Gambling Awareness Month to further Responsible Gaming education and research programs. Since 1996, Caesars Entertainment has donated more than \$6 million to support the ICRG in providing independent, peer-reviewed research that helps increase the understanding of gambling disorders.

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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:

g. Commitment to improvement and reporting

MGA through its sportsbook operating subsidiary, Raynham Park Sportsbook LLC (“RPS”) will add additional compliance oversight including two internal oversight committees: an Audit Committee and a Compliance Committee. The Audit Committee will be charged with overseeing the preparation and review of RPS’s audited financial statements by the CPA firm(s) engaged by RPS as well as all other financial and accounting oversight responsibilities typically assigned to a corporate audit committee. The Compliance Committee will be charged with overseeing all RPS regulatory compliance functions, including without limitation compliance with all applicable rules and regulations of the Massachusetts Gaming Commission promulgated under the Massachusetts Sports Wagering Act. The composition of both the Audit Committee and the Compliance Committee will be required at all times to include independent members who are unaffiliated with the Carney family and the retail and mobile/online vendors engaged by RPS to operate its sports wagering and simulcast racing activities. RPS will use its best efforts to secure the participation of independent members of the Compliance Committee with relevant industry expertise in gaming and sports wagering operations and regulatory compliance.

In addition, a Responsible Gaming Committee will be established for the Caesars Sportsbook team, which will comprise of multiple department designees. The Responsible Gaming Committee will meet on a quarterly basis to review, audit, and ensure compliance with and effective implementation of both government-required, as well as the company’s Responsible Gaming Program brand standard requirements and adherence to its policies.

Annual Refresher Responsible Gaming training is mandatory for customer facing/contact and corporate team members. A periodic audit report, to ensure completion of training, is maintained by Caesars Sportsbook’s human resources team.

Caesars Sportsbook is committed to working with academic institutions and research organizations to advance research on topics related to Responsible Gaming to improve its knowledge and provide insight as to how the company can improve its programs.

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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. Estimate marketing budget in the Commonwealth

Caesars Sportsbook plans to spend between [REDACTED] towards both retail and mobile sports wagering marketing and advertising in the Commonwealth in 2023. Caesars Sportsbook will use a full mix of media, including [REDACTED] to reinforce the quality of the Caesars Sportsbook experience and brand, its commitment to responsible gaming, as well as to provide unique offers to sports fans and bettors. Caesars Sportsbook's approach to forecasting and spending media is highly data-driven and optimized on a weekly, monthly, and annual basis. Caesars Sportsbook will leverage years of experience to successfully launch in Massachusetts, acquire new sports betting customers, shift current sports bettors from unlicensed competitors, and sustain engagement.

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:

b. Promotion and player loyalty programs

Raynham Park will leverage Caesars Rewards for its retail sports betting loyalty program.

Caesars Rewards

With Caesars Rewards, Caesars Sportsbook stands alone in the sports betting landscape. It is the gaming industry's largest and oldest loyalty program and is widely regarded as the best in class by its customers as well as industry and loyalty publications like Loyalty 360, USA Today, and the Freddie Awards. There is no other operator in the world that can match the depth and reach of the Caesars Rewards program. With Caesars Rewards, bettors access an empire; an empire where they are always a VIP and can be rewarded with free bets, special bonuses, tickets to sports games, or hotel stays on Caesars Sportsbook.

The program consists of 1) the richest database of consumer gaming behavior with over 65 million members worldwide, 2) existing loyal relationships with Massachusettsans, and 3) the most sophisticated data science platforms that consistently drive immediate returns.

There are two ways customers can earn benefits with Caesars Rewards.

The first way customers earn benefits with Caesars Rewards is that they receive personalized offers like free bets, hotel rooms, dining credit and other VIP experiences, as well as Reward Credits (cash back). Customers can then use these rewards at their discretion to do the things they love. [REDACTED]

[REDACTED]

The second way customers earn benefits with Caesars Rewards is through a traditional tiering system. There are six tiers that customers progress through, and at each tier, customers are entitled to more significant benefits. For example, a gold customer (the lowest tier) is entitled to personalized offers, special Caesars Rewards pricing on hotel rooms, and a free bet on their birthday online. Seven Stars customers (the highest tier) can enjoy free hotel rooms, no resort fees, free valet parking, a Seven Stars weekend retreat, including airfare and entertainment, and free stays with Caesars Entertainment's partners, amongst other perks.

In addition to the offers and tier benefits Caesars Sportsbook's customers enjoy, Caesars Rewards also has several meaningful partnerships that can enhance customers' experiences (e.g., the NFL, Atlantis Paradise Island in the Bahamas, Wyndham Resorts, Hertz Rental Cars, Norwegian Cruise Lines, Vivid Seats, 1-800 Flowers and more) which allow customers to extend their membership benefits beyond Caesars Entertainment's sportsbook or casinos.

Caesars Rewards offers portability across its vast network. A guest who earns Seven Stars in Las Vegas receives Seven Stars treatment across the rest of the Caesars Entertainment portfolio. This delivers the

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program's key competitive advantage: Caesars Sportsbook's customers have nationwide opportunities to be treated like a VIP. A VIP in Massachusetts is a VIP everywhere.

Customers can open a Caesars Rewards account and receive a physical card at the sportsbook. They can also opt in (or out) to receive more information via email and/or direct mail on future promotions and ways to earn more rewards as they wager through Caesars Sportsbook.

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***

Caesars Sportsbook's and Raynham Park's goal will be to create an environment where customers can watch games, eat and drink, while enjoying the sportsbook experience. Caesars Sportsbook's proprietary betting technology and trading platform will give players more options to bet (e.g., live wagering, parlays), while also enjoying the social atmosphere and ambiance.

Caesars Sportsbook and Raynham Park will work to develop a year-round promotional event calendar that will drive sports fans to the Caesars Sportsbook at Raynham Park. To attract residents across Bristol, Plymouth and Norfolk counties, marketing tactics that will be used to drive traffic to the property will include, but not be limited to:

- █ [REDACTED]
- █ [REDACTED]
- █ [REDACTED]
- █ [REDACTED]
- █ [REDACTED]

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

Caesars Sportsbook works with its retail sports wagering partners to ensure that minors are not exposed to its advertising messages. Caesars Sportsbook also mixes in responsible gaming advertising to ensure that existing and potential customers manage their sports betting responsibly. Furthermore, through social media, Caesars Sportsbook uses the platforms' data to ensure that it is both avoiding minors and not saturating them with Caesars Sportsbook messaging.

All Caesars Sportsbook advertising through its products and services must be truthful and consistent with generally accepted standards of good taste.

In order to codify its commitment to the principals of responsible gambling and responsible marketing more generally, Caesars Sportsbook has adopted a marketing and advertising code, which can be found in the following link:

<https://www.caesars.com/corporate-social-responsibility/responsible-gaming/marketing-and-advertisement-code>.

This code applies to the marketing and advertising of Caesars Entertainment, Inc. ("Caesars Entertainment") and its subsidiaries and affiliates that promote Caesars Sportsbook services or any of its brands.

Promoting responsible gambling is part of Caesars Sportsbook's daily culture. Its longstanding position has been that if a customer gambles with Caesars Sportsbook for any reason other than the fun of it, that customer is playing for the wrong reason. Many observers have lauded Caesars Entertainment's industry-leading programs and practices in combating problem gambling. The advertising and marketing of Caesars Sportsbook's activities must be sensitive to these issues.

For advertising to be considered "gambling advertising," the advertising must directly market or promote gambling or gambling-related services amenities or options.

Caesars Sportsbook prides itself not to promote gambling at any event where the majority of the audience is reasonably expected to be below the legal age to gamble in that jurisdiction, and Caesars Sportsbook is sensitive to audience demographics for advertising or promotions involving alcohol or other age-restricted products and services. Signage with the venue's or the venue location's name, logo, etc., is not considered a violation of this provision.

No Caesars Sportsbook gaming brand, logo, trademark, or service mark is to be used or licensed for use on clothing, toys, game equipment or other materials that are intended primarily for persons below the legal age to gamble in the relevant jurisdiction. Materials that are intended primarily for persons below the legal age to gamble in the relevant jurisdiction, regardless of the presence of any product name, logo,

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trademark, or service mark, are not used as promotional materials or given away at events, except in response to an approved charitable request. Material is intended to be distributed primarily to persons below the legal age to gamble in a casino if it has special attractiveness to such persons above and beyond the general attractiveness it has for persons above the legal age to gamble in the relevant jurisdiction.

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*

Caesars Sportsbook's minimum age to participate, without exception, is 21 years of age or older. To drive patrons to the property, Caesars Sportsbook will work together with Raynham Park to create an entertaining and exciting atmosphere, not just a transactional location for sports betting. The parties will provide an environment for sports fans and bettors, offering a range of services such as betting windows with live tellers to help answer questions, self-service kiosks distributed throughout the sportsbook and other approved areas of the property, food and beverage services, and seating and lounging areas to watch the games.

[REDACTED]

Caesars Sportsbook and Raynham Park are committed to not targeting college students and will not advertise at college athletic events in the Commonwealth or enter into any marketing partnerships with any of the Commonwealth's colleges and universities.

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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

Pursuant to its Marketing and Advertising code, Caesars Sportsbook does not market gambling materials or content to social games customers unless Caesars Sportsbook has verified that they are of the legal age to gamble in the relevant jurisdictions. Caesars Sportsbook also ensures that all print gambling advertising includes a message offering a toll-free helpline for individuals who might have a gambling problem. The requirement for the messages is subject to the rules or regulations of the relevant jurisdiction.

Caesars Sportsbook also sponsors public awareness, education, and other campaigns regarding problem and underage gambling. This includes participating in National Problem Gambling Awareness Month and Responsible Gaming Education Month.

Finally, Caesars Sportsbook incorporates responsible gaming tools within the application and provides resources to customers informing them of the risks of problem gambling and the tools available to them to address these matters. Such tools include self-imposed limit setting such as deposit limits, spend limits, time limits, cool off periods and self-exclusion.

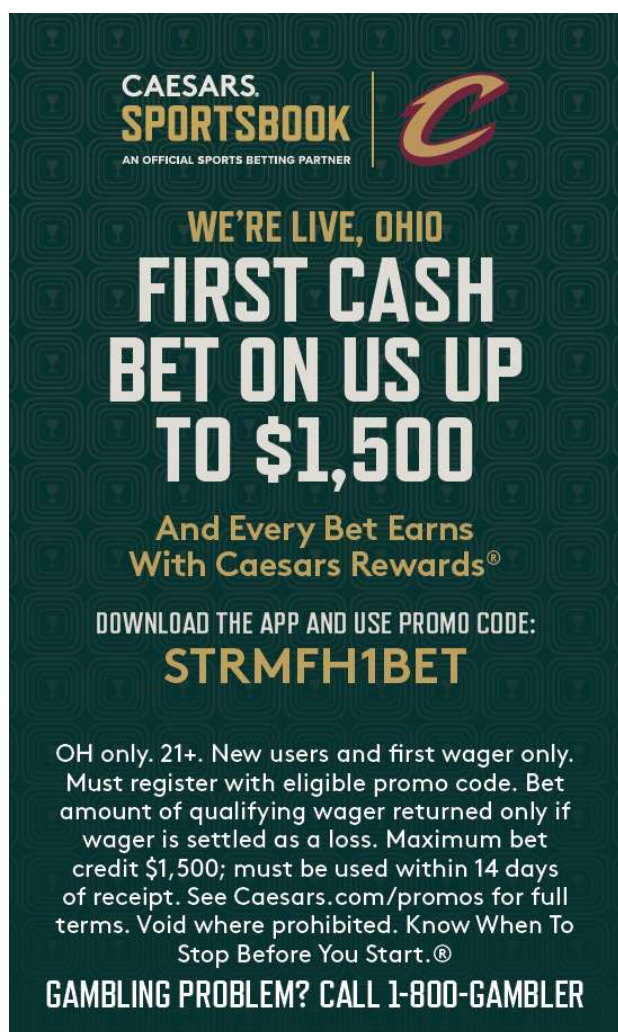
E.2 ADVERTISING & PROMOTIONAL PLANS

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**

The following are samples of on-property marketing, advertising, and promotional materials and activities in other jurisdictions:

Palm Cards (Front/Back)



CAESARS
SPORTSBOOK
AN OFFICIAL SPORTS BETTING PARTNER



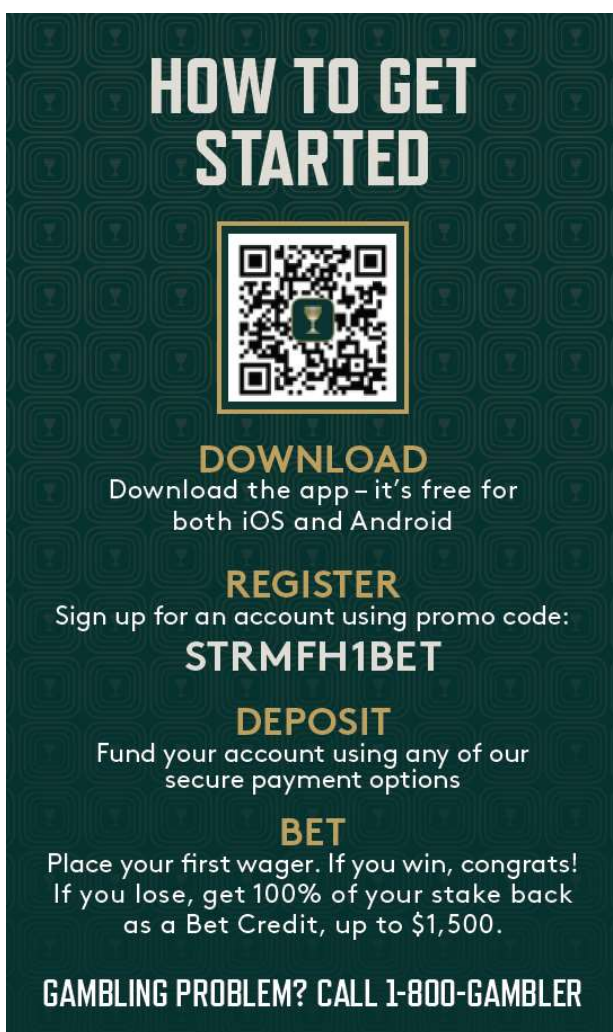
WE'RE LIVE, OHIO
**FIRST CASH
BET ON US UP
TO \$1,500**

**And Every Bet Earns
With Caesars Rewards®**


DOWNLOAD THE APP AND USE PROMO CODE:
STRMFH1BET

OH only. 21+. New users and first wager only. Must register with eligible promo code. Bet amount of qualifying wager returned only if wager is settled as a loss. Maximum bet credit \$1,500; must be used within 14 days of receipt. See Caesars.com/promos for full terms. Void where prohibited. Know When To Stop Before You Start.®

GAMBLING PROBLEM? CALL 1-800-GAMBLER



**HOW TO GET
STARTED**



DOWNLOAD
Download the app – it's free for both iOS and Android

REGISTER
Sign up for an account using promo code:
STRMFH1BET

DEPOSIT
Fund your account using any of our secure payment options

BET
Place your first wager. If you win, congrats! If you lose, get 100% of your stake back as a Bet Credit, up to \$1,500.

GAMBLING PROBLEM? CALL 1-800-GAMBLER

Rack Cards (Front/Back)

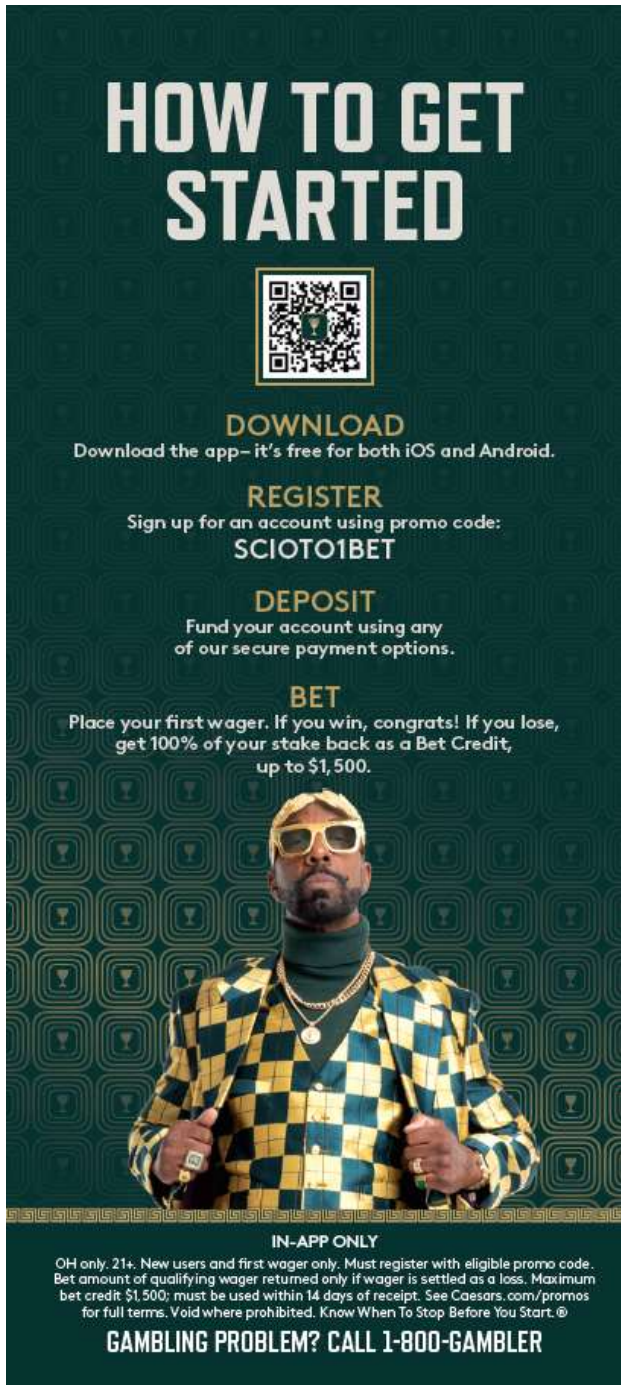


CAESARS SPORTSBOOK
PROUD SPONSOR OF THE NFL


WE'RE LIVE, OHIO
FIRST CASH
BET ON US
UP TO \$1,500

And Every Bet Earns
With Caesars Rewards®

GAMBLING PROBLEM? CALL 1-800-GAMBLER



HOW TO GET STARTED



DOWNLOAD
Download the app— it's free for both iOS and Android.

REGISTER
Sign up for an account using promo code:
SCIOTO1BET

DEPOSIT
Fund your account using any
of our secure payment options.

BET
Place your first wager. If you win, congrats! If you lose,
get 100% of your stake back as a Bet Credit,
up to \$1,500.

IN-APP ONLY
OH only. 21+. New users and first wager only. Must register with eligible promo code.
Bet amount of qualifying wager returned only if wager is settled as a loss. Maximum
bet credit \$1,500; must be used within 14 days of receipt. See Caesars.com/promos
for full terms. Void where prohibited. Know When To Stop Before You Start. ®

GAMBLING PROBLEM? CALL 1-800-GAMBLER

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Educational Coasters (Front/Back)



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USE PROMO CODE:
SHOEPICS



MD only. 21+. New users only. Must register with eligible promo code. Super Boosts do not qualify. First wager of \$20-\$100 qualifies for max free bet of \$100. Only the first wager of more than \$100 will have bet amount of qualifying wager returned if wager is settled as a loss. Maximum bet credit \$1,500; must be used within 14 days of receipt. See Caesars.com/promos for full terms. Void where prohibited. For help, visit mdgambinghelp.org or call or text 1-800-GAMBLER.

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Table Tents (Front/Back)

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HOW TO GET STARTED



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Sign up for an account using promo code:
SCIOTO1BET

DEPOSIT
Fund your account using any
of our secure payment options.

BET
Place your first wager. If you win, congrats! If you
lose, get 100% of your stake back as a Bet Credit,
up to \$1,500.

IN-APP ONLY
OH only, 21+. New users and first wager only. Must register with eligible promo code. Bet amount of qualifying wager returned only if wager is settled as a loss. Maximum bet credit \$1,500; must be used within 14 days of receipt. See Caesars.com/promos for full terms. Void where prohibited. Know When To Stop Before You Start.®

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Deposit Only Kiosks Signage (On Digital Screen)



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WAYS TO DEPOSIT CASH**

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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

Raynham Park voluntarily entered into a relationship with GameSense for its simulcast facility and will expand its existing relationship on expansion as a sports wagering responsible gaming partner. In the event that the Commonwealth requires an on-premise presence, Raynham Park's planned facility includes dedicated space for GameSense (or the Commonwealth's selected affiliate) on the gaming floor. This space will include our vestibule and main betting window area. Raynham Park will also provide office space away from the gaming floor that will allow for discreet conversations with patrons regarding responsible gaming. Please refer to Exhibit E.3(b) for reference to the committed locations for the Commonwealth's selected responsible gaming affiliate.

Promoting Responsible Gaming is part of the culture of Caesars Sportsbook and Caesars Entertainment, Inc. ("Caesars Entertainment") (collectively "Caesars"). It's the foundation of its Code of Commitment which spells out the principles that govern the way Caesars does business. The company's long-standing and continuing commitment to Responsible Gaming is something it take great pride in. Caesars Entertainment's position on this issue is clear: We want everyone who gambles at our casinos and sportsbooks to be there for the right reasons – to simply have fun. We believe that all entities involved in legal wagering have an obligation to promote Responsible Gaming and address underage gambling.

In addition, Caesars Sportsbook has tools afforded to the patron to assist with responsible gambling.

Caesars also has a long-standing history of supporting organizations that promote Responsible Gaming in the jurisdictions in which it operates. Caesars is proud to support and contribute to the efforts of the following organizations: National Council on Problem Gambling, International Center for Responsible Gaming, and several local problem gambling councils in states where Caesars operates. Representatives of Caesars and Caesars Sportsbook are also proud to serve on the board of multiple charitable organizations, including the National Council on Problem Gambling Advisory Board, International Center for Responsible Gaming Board, Nevada Council on Problem Gambling Board, Nevada State Advisory Committee on Problem Gambling, Council on Compulsive Gaming of New Jersey, Inc., and the Indiana Council on Problem Gambling.

Caesars Sportsbook anticipates making similar contributions to organizations that provide Responsible Gaming services to the Commonwealth.

E.3 HISTORY OF DEMONSTRATED COMMITMENT

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

b. Assist patrons and users that are experiencing gambling-related harm

See Answer E.3(a) above. In addition to meeting the Commission's responsible gaming framework, Raynham Park will offer onsite resources and will also rely on the extensive tools available through Caesars Sportsbook's website for patrons to access.

Caesars Sportsbook will assist patrons and users that are experiencing gambling-related harm in a number of ways. Caesars Sportsbook offers a dedicated website that allows users to avail themselves of the self-restriction and self-exclusion tools available in the Commonwealth.

The website contain information to assist patrons and users that may be experiencing gambling-related harm such as the following sample information:

What Is Problem Gambling?

Like many other addictions, compulsive betting is rooted in an uncontrollable urge and obsession, which if left unchecked, can lead to (among other things) financial hardship.

Unfortunately, one of the most common symptoms of this disease is deception; problem gamblers will go to great lengths to hide the problem, not just from others, but also from themselves. As a result, detection can come late after adverse consequences are revealed and with dire consequences.

A negative vicious cycle often develops, wherein the gambler seeks relief or even a solution through increased gambling. The ensuing financial and emotional deterioration affects every aspect of a bettor's life from family and friends to business colleagues and associates. Compulsive gambling is a disease that does not discriminate. Anyone is susceptible regardless of gender, age, race, or financial status. Fortunately, once detected, it is an addiction that can be successfully treated.

The Warning Signs:

- Sacrificing time from work or family in order to gamble
- Repeated inability to stop or control betting
- Borrowing money to gamble or to pay off previous bets
- Use of gambling as an emotional escape
- Self-neglect or neglect of family due to gambling
- Lying about time or money lost to betting

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- Gambling more in order to recoup previous losses ("chasing")
- Obtaining money for gambling by selling/pawning personal property
- Feelings of hopelessness, depression or suicide

What Is Pathological Gambling?

Pathological gambling has been listed as a recognized psychological disorder in the international classification systems DSM-IV and ICD-10 since 1980. It is defined as persistent, recurring and often increasing gambling despite negative personal and social consequences such as debt, breakdown of social relations and impairment of professional development.

When Should Behavior Be Considered Problematic?

We would like to stress that diagnoses relating to clinical disorders can only be made by trained specialists. Below is information which will allow you to quickly assess and consider your own behavior. If you can identify with four or more of the following characteristics, we recommend that you speak to a professional:

- Are you highly involved in gaming?
- Do your thoughts constantly turn to gaming?
- Are you constantly increasing your stakes?
- Even beyond your financial means?
- Have you unsuccessfully attempted to quit or cut down your gaming?
- Do you become irritated and frustrated after attempting to reduce the extent of your gaming?
- Does gaming serve as a means of getting away from problems or unpleasant feelings?
- Have you ever tried to win back losses by taking risks you usually would not take?
- Have ever you lied about the extent or success of your gaming?
- Has your gaming ever led to a negative impact on your relationships or your job?
- Have you ever been forced to rely on others to finance your gaming?

Are you at risk?

Try these Self-Help Gambling Tools: <https://www.ncpgambling.org/help-treatment/screening-tools/> to find out whether you are at risk of developing gaming related problems. All your answers are completely anonymous and not retained by Caesars Sportsbook.

Prevention

Gaming is a great source of entertainment for millions of people around the world. But, for a minority, gaming can cause problems. We are committed to identifying

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risks as early as possible and intervening to prevent these problems before they emerge. We have in place a Responsible Gaming framework which includes controls to help customers to play within their limits and avoid a situation where gaming causes problems.

In addition to these tools, Caesars Sportsbook trained multiple customer service team members as Responsible Gaming Ambassadors. Responsible Gaming Ambassadors are trained to speak with and assist patrons who may not be gambling responsibly. Responsible Gaming Ambassadors are empowered to address responsible gaming concerns with customers if a patron interaction is warranted or requested. Responsible Gaming Ambassadors also prepare and retain summaries on a confidential basis in the company's Responsible Gaming Log in a manner that permits Caesars Sportsbook's Responsible Gaming officials to evaluate guest interactions. Responsible Gaming Ambassadors have been a hallmark of Caesars Sportsbook's Responsible Gaming program and provide an outreach tool that allows customers of Caesars Sportsbook to receive industry leading attention to these matters in a confidential, professional manner.

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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:

- c. Cooperate and support any government or regulatory agencies to promote responsible gaming and/or mitigate gambling-related harm**

Raynham Park and Caesars Sportsbook will support the Massachusetts Gaming Commission and any additional government or regulatory agencies to promote responsible gaming and/or mitigate gambling-related harm. In addition to this pledge of support, Raynham Park and Caesars Sportsbook will afford customers wishing to be excluded through the voluntary self-exclusion program offered by the Massachusetts Gaming Commission with information on the dedicated website for Massachusetts patrons.

As the retail sportsbook operator, Caesars Sportsbook will:

- a. Deny any self-excluded person seeking to place a sports wager or register for a sports wagering account;
- b. Refuse to accept a wager from any individual that Caesars Sportsbook has identified as being on the self-exclusion list or a person Caesars Sportsbook suspects of being on the company voluntary self-exclusion list;
- c. Remove self-excluded persons from player loyalty or reward card programs and targeted print, online or other forms of advertising or promotions within 5 business days of self-exclusion notification;
- d. Refrain from marketing to individuals on the self-exclusion list; and
- e. Deny access to complimentary services or items, check cashing privileges, player reward programs, and other similar benefits to persons on the list.

Caesars Sportsbook's dedicated website on responsible gaming in Massachusetts will offer information and resources regarding risks associated with gambling, myths about gambling, signs and symptoms of gambling disorders and will provide links that can provide resources to prevent underage and problem gambling.

E.3 HISTORY OF DEMONSTRATED COMMITMENT

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

- d. List any membership or partnership with any agency or organization whose mission is in whole, or in part, dedicated to responsible gaming or problem gambling**

Caesars Entertainment, Inc. (“Caesars Entertainment”) has a membership with the National Council on Problem Gambling (NCPG) as well as memberships with state local council affiliates. The National Council on Problem Gambling serves the as the national advocate to minimize gambling-related harm. NCPG seeks to improve health and wellness by reducing the personal, social and economic costs of problem gambling. Their mission is to lead state and national stakeholders in the development of comprehensive policy and programs for all those affected by problem gambling.

Caesars Entertainment also supports the International Center for Responsible Gaming (ICRG). Since its founding in 1996, the ICRG has launched a field of study to explore gambling disorder and responsible gambling and has funded some of the most important research in the US and around the world. The ICRG is inspired by the mission to help individuals and families affected by gambling disorder through first-class research and evidence-based education programs. Research will lead us to effective prevention and treatment of gambling disorder. Caesars Entertainment provides an annual grant to the ICRG.

Raynham Park and Caesars Entertainment will support and work with organizations in the Commonwealth that support this mission, such as the Massachusetts Council on Gaming and the Massachusetts Department of Public Health Office of Problem Gambling Services.

E.3 HISTORY OF DEMONSTRATED COMMITMENT

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

- e. List any awards or recognition the applicant has received, related to efforts to promote responsible gaming, or mitigating gambling-related harms**

Raynham Park is pleased to partner with Caesars Sportsbook and take advantage of Caesars Entertainment, Inc.'s ("Caesars Entertainment's" or "Caesars") long-standing commitment to Responsible Gaming, which involves many "firsts" in the industry, and Caesars Sportsbook continues to set the industry standard today:

- 1989 Harrah's Entertainment becomes first commercial casino company to officially address problem gambling and create the industry's first RG programs.
- 1990 Harrah's CEO recognized for lifetime contributions to responsible gaming by the National Council on Problem Gambling.
- 1994 Harrah's becomes first casino company to retain a responsible gaming consultant.
- 1995 Partnership with AT&T, National Council on Problem Gambling for first national tollfree helpline.
- 1996 Industry's first "Director of Responsible Gaming" position created.
- 1999 Industry's first national self-exclusion and self-restriction programs implemented.
- 2000 Code of Commitment and Advertising/Marketing Code adopted.
- 2000 The Gaming Hall of Fame, a panel of peers in the commercial casino industry, bestows on Caesars its first-ever Special Achievement Award for its leadership and pioneering programs on responsible gaming.
- 2002 Launched the industry's first broadcast advertising campaign devoted specifically to Responsible Gaming.
- 2003 Implemented new responsible gaming policy, including the innovative duties for Responsible Gaming Ambassadors, based on the latest scientific and scholarly research.
- 2003 Deployed three distinct responsible gaming training modules, introducing Responsible Gaming Ambassador training.
- 2004 Launched RG2 IT application.
- 2005 Caesars executives elected to boards of National Council on Problem Gambling and National Center for Responsible Gaming.
- 2012 Implemented RG ID at Slots application to identify excluded patrons playing slots.
- 2012 Caesars Windsor becomes first casino to receive responsible gaming accreditation through Ontario Responsible Gambling Council's RG Check program.
- 2013 Caesars introduces its first ever online gambling product and expanded enforcement of all self-exclusion requests related to online gaming to its land-based facilities.

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2018 Caesars launches RG research and cultural translation initiatives in Japan.

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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:

- 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**

None. In an abundance of caution and transparency, Raynham Park makes the following voluntary disclosure notwithstanding that this matter did not result in a fine, citation or compelled corrective action and did not relate to Raynham Park's simulcast license.

In 2011, Raynham Park rented space to an entity, JRM Charitable Gaming to operate a poker room for charity poker. JRM along with other entities at the time represented that it could operate poker tournaments within the confines of the Commonwealth's charities laws where JRM would run the tournaments and make payouts to a rotating group of public charities. Ultimately, the Office of the Attorney General raised concerns with the use of the charitable gaming laws to effectively run a for profit business. See G.L. c. 271, sec. 7A. As soon as concerns were raised by regulators, Raynham Park suspended the use of its space and no longer allowed the poker tournaments absent the approval of the Attorney General's Office and local officials who must permit such events.

At no time was Raynham Park accused or investigated for any violation of law and fully cooperated with the Attorney General's Office. At the time the matter was publicized in the Boston Globe.

See: http://archive.boston.com/news/local/massachusetts/articles/2011/04/15/raynham_park_poker_room_operator_halts_games_amid_inquiry/

SECTION E: 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. 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**
- d. How the applicant will log information received from the system**
- e. How the applicant will report the information received from the system to the Commission**

Not Applicable for retail sports wagering.

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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.

- a. Ensure the integrity of the user's account information**
- b. Ensure the integrity of a user's device if it indicates tampering or suspicious activity**
- c. Notify the applicant of potential risks or fraudulent activity**

Not Applicable for retail sports wagering.

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

[Redacted]

[Redacted]

- | [Redacted]
- | [Redacted]
- | [Redacted]
- | [Redacted]

[Redacted]

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:

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

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

- | [REDACTED]
- | [REDACTED]
- | [REDACTED]
- | [REDACTED]
- | [REDACTED]

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:

c. Description, location, and periodic testing of servers

[REDACTED]

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:

- e. Security of patron personal and wagering information**

[REDACTED]

[REDACTED]

[REDACTED]

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:

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

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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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 implantation of a sports wagering operation:**
 1. **Other Applicants**
 2. **Businesses**
 3. **Contractors**
 4. **Vendors**

MGA and RPS have submitted the requisite Business Entity Disclosure Forms, and their Operating Lease Agreement with Caesars Sportsbook.

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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 Supplement Form**

All forms have been submitted as directed by the IEB and Licensing Division.

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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:

- a. 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***

Please see Answers to Section C.4.n-q. Please also see the Operating Lease Agreement among MGA, RPS and Caesars Sportsbook attached as Exhibit B.1. Attached as Exhibit G.3(a) is a chart listing all current capital contributions and sources of funds as well as prospective capital funds.

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APPLICATION FOR SPORTS WAGERING OPERATOR LICENSE

EXHIBIT G.3.a

G.3.a SOURCES OF CAPITAL

Raynham Park's sources of capital for the proposal are as follows:

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

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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. 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***

The following table shows Caesars Sportsbook’s projected capital investments and budget for its retail pari-mutuel and sports wagering operations as well as projection for Raynham Park’s food and beverage expense and capital contributions.

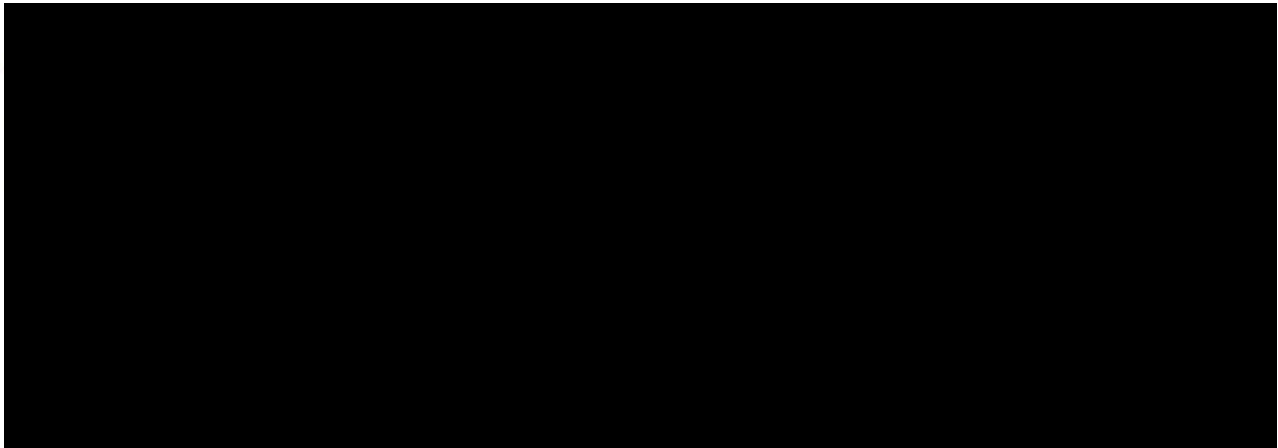
<i>In millions</i>	Year 1	Year 2	Year 3	Year 4	Year 5					
<u>Budget</u>										
Race and Sports Wagering Volume (Handle)										
Race and Sports Gross Receipts (Revenue)										
Food and Beverage Revenue										
<hr/> Total Revenue										
Gaming Taxes										
Race and Sports Staff Costs										
Security and Surveillance Costs										
Sportsbook Expenses (e.g., Supplies, Data, Parlay Cards)										
Racing-Related Expenses (e.g., Host Fees, Tote Fees)										
Food and Beverage-Related Expenses										
<hr/> Total Operating Expenses										
EBITDA										
<u>Capital Investments</u>										
Construction and Development of Race and Sportsbook										
Race and Sportsbook Equipment										
License Fees										
Application Fees										
<hr/> Total Capital Investments										

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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. 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**



The following table shows the projected Year 1 revenue from retail pari-mutuel and sports wagering, under average, best, and worst case scenarios. These revenues are based on factors such as past performance at retail sportsbooks in other jurisdictions (and at Raynham Park for pari-mutuel), competitors in the market, population density, location of the property, as well as available market data in other live jurisdictions, and understanding of likely market dynamics.

<i>in millions</i>	Year 1
Average Scenario	
Best Scenario	
Worst Scenario	

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

For Raynham Park, please see the chart set forth below for the last 9 months ending September 30, 2022. Copies of Raynham Park's compiled financial statements for the last 5 years are included as attachments to MGA's Business Entity Disclosure Form. Further as set forth in question C.4 and G.3, the working capital for the sportsbook operations will be provided by Caesars Sportsbook under the Operating Lease Agreement among Caesars Sportsbook, MGA and RPS.

For Caesars Sportsbook, in the last 12 months (November 2021 to October 2022), Caesars Sportsbook's retail sports wagering gross margin (or win/hold percentage, calculated as gross win as a percentage of handle) [REDACTED]

In the last 12 months (November 2021 to October 2022), Caesars Sportsbook's retail sports wagering net margin (calculated as EBITDAR, prior to paying out partner share, as a percentage of gross win) [REDACTED]

The liquidity, leverage, and other profitability ratios are not calculated at the subsidiary or segment level. Details on the liquidity, leverage and profitability for the ultimate parent company, Caesars Entertainment, Inc., can be found in its public reports, in the following links:

- Q3 2022 Earnings Release – <https://investor.caesars.com/static-files/58a8bc05-ac31-4398-a90e-cecad98cfcc0>
- 2022 Third Quarter Report (Form 10-Q) – <https://investor.caesars.com/node/32976/html>

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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. 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***

None.

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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. 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 of the applicant**

Please see list of Litigation attached as Exhibit G.3(f).

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EXHIBIT G.3(f)

Date filed	Name & Address of the Court	Docket/Case #	Other parties to Suit	Nature of Suit	Disposition	Date of Disposition
09/27/2021	USDC-MA 1 Courthouse Way, Boston, MA 02210	1:21-cv-11572- WGY	Plaintiffs: Philadelphia Indemnity Insurance Company Defendants: BAS Holding Corp., Brockton Agricultural Society	Insurance claim dispute	Pending. On Appeal from a Final Judgment of the USDC- MA	N/A
04/01/2020	USDC-MA 1 Courthouse Way, Boston, MA 02210	1:20-CV-10648- WGY	Plaintiffs: Edward Groden Defendants: Fairside Trucking, Inc.	Action under the Employee Retirement Income Security Act of 1974 brought on behalf of New England Teamsters and Trucking Industry Pension Fund for damages and injunctive relief arising from unpaid withdrawal liability.	Settled	04/22/2022
01/31/2022	Brockton District Court 215 Main Street Brockton, MA 02301	2215SU000022	Plaintiffs: George L Carney, Jr. As Trustee of The Carney Office Building Trust, Defendants: Shaena Gilliard	Possession and rent	Decided	03/04/2022

12/27/2018	Middlesex Superior Court 200 Trade Center Woburn MA 01801	1881CV01214	Plaintiffs: Ipanema Productions, Inc., Floripa Producoes, Inc, Rita Bondardo Defendants: BAS Holding Corp.	Alleged violation of License Agreement for a Brazilian-themed event to be held at the Brockton FairGrounds on 5/27/2018.	Dismissed	8/30/2019
09/22/2016	Bristol County Superior Court 441 County Street -1st Floor New Bedford, MA 02740	1673CV00774	Plaintiffs: SEI Fuel Services, Inc. Defendants: Massasoit Gas, Inc.	Contract dispute	Dismissed	5/16/2019
8/27/2018	Taunton District Court 40 Broadway Street Taunton, MA 02780	1831SU000049	Plaintiffs: Massasoit Greyhound Association, Inc, Defendants: Richard Ferreira	Possession and rent	Decided	09/14/2018
11/9/2017	Plymouth Probate & Family Court (Brockton Division) 215 Main St, Brockton, MA 02301	No. PL 7E0066QC	Plaintiffs: Dennis J Carney and Thomas P. Carney Defendants: George L. Carney, Jr	Termination of the trust and a distribution of trust assets	Settled	09/08/2020
09/28/2016	USDC-MA 1 Courthouse Way, Boston, MA 02210	1:16-cv-11079- FDS	Plaintiffs: New England Horsemen's Benevolent and Protective Association Defendants: Massachusetts Thoroughbred Horsemen's Association and Middleborough Agricultural Society	Alleged violation of Interstate Horseracing Act	Dismissed	09/28/2016

07/02/2014	Supreme Judicial Court, John Adams Courthouse, 1 Pemberton Square, Suite 2500, Boston, MA	No. 16-P-459	Plaintiffs: Massasoit Industrial Corporation Defendants: Massachusetts Commission Against Discrimination	Appeal of MCAD decision	Decided	3/23/2017
5/9/2014	Plymouth County Superior Court	PLCV2013-00861	Plaintiffs: Darlene Cummings Defendants: George Carney as Trustee of Carney Family Trust	Tort claim (fall) against tenant and landlord	Settled	08/09/2013
05/29/2013	Appeals Court of Massachusetts John Adams Courthouse, 1 Pemberton Square UNIT 1200, Boston, MA 02108	No. 13-P-776	Plaintiffs: Earthsource Inc., George L. Carney, Jr.; Leatitia Carney; Robert Kelly; Kelly C. Kelly; Marie Buckley; Jill Mead; Timothy Mead; Louis Columbo; Gary Temple; Maura Carney; Timothy Carney; Thomas Carney; Morgan Carney; Dennis Carney; and Guy Campinha Defendants: Commissioner, MA Department of Environmental Protection, Covanta Operations of SEMASS, LLC; Covanta SEMASS, LLC; SEMASS Partnerships; Covanta Company of SEMASS, LP; Covanta Haverhill, Inc.; Covanta Haverhill Properties, Inc.; Covanta Springfield, LLC; and Covanta Pittsfield, LLC.	Disputed violations of environmental regulations	Decided	10/21/2014
05/09/2014	Supreme Judicial Court of Massachusetts, Suffolk Ss.	SJ-2014-0185	Plaintiffs: Carney Family Group, LLC, Massasoit Greyhound Association, Inc., Taunton Dog Track, Inc., And George L. Carney, Jr. Defendants: Stephen P. Crosby, Gayle Cameron, James F. McHugh, Bruce Stebbins, and Enrique Ziniga, (Commissioners Of The Massachusetts Gaming Commission), Springfield Gaming and Redevelopment, LLC, and Ourway Realty LLC	Appeal of Cat 2 license award	Dismissed	08/08/2014
07/29/2010	Middlesex County Superior Court 200 Trade Center Wobum, MA 01801	1081CV02865	Plaintiff: Amy Moran Defendants: Brockton Fair Caterers, Inc., Brockton Agricultural Society, George Carney, Maura Carney, Steve Boger	Personal injury claim being defended by insurer	Settled	12/11/2013
02/01/2010	Bristol County Superior Court 9 Court Street Taunton, MA 02780	10-00120	Plaintiffs: George L. Carney, Jr. and Maura Carney as Trustees of Pine Realty Trust Defendants: Mie Warren, David Oakley	Action by trust to set aside fraudulent deed by Mie Warren	Deed vacated, remaining claims dismissed by agreement.	11/13/2012
03/09/2012	Superior Court Plymouth county	No. PLCV2012-00304	Plaintiffs: George L. Carney, Jr. Defendants: Michael Galvin	Collect debt owed by Galvin.	Settled	6/12/2012

05/10/2010	Superior Court Bristol County New Bedford MA	No. 2010-00578	Plaintiffs: Hess Corporation Defendants: Carney Properties d/b/a Massasoit Greyhound Association Inc.	Contract dispute	Dismissed	02/16/2011
11/12/2009	Berkshire County Superior Court 76 East Street Pittsfield, MA 01201	09-322	Pennsy Supply, Inc. Defendants: EarthSource, Inc.	Contract dispute with material supplier	Settled	1/18/2011
05/04/2009	Bristol County Superior Court New Bedford, MA	09-00641	Plaintiffs: Sterling Suffolk Racecourse, LLC Defendants: Massasoit Greyhound Association, Inc., Taunton Dog Track, Inc.	Dispute concerning simulcast settlement	Dismissed	07/27/2009
09/04/2008	Superior Court Plymouth County Brockton MA	No. 2008-01176	Plaintiff and Defendant in-counterclaim: Tsokanis. Defendants and Plaintiffs in-counterclaim: George L. Carney, Jr., Laetitia Carney.	Disputed architect's fee and consumer protection act counterclaim	All claims and counterclaims dismissed by settlement.	02/11/2009
2008	Massachusetts Supreme Judicial Court, One Pemberton Square, Boston, MA 02108	Reported 451 Mass.803	Plaintiffs: George L. Carney, Jr., Laetitia A Carney, Maura J. Carney, Gary M. Temple Defendants: Massachusetts Attorney General and Secretary of the Commonwealth	Voter suit to quash certification of initiative petition seeking to ban live greyhound racing.	Decided	7/15/2008

Date filed	Name & Address of the Court	Docket/Case #	Other parties to Suit	Nature of Suit	Disposition	Date of Disposition
03/02/2022	United States Bankruptcy Court District of Massachusetts	22-10263	American Waste Services, LLC	Chapter 7 bankruptcy case	Pending	n/a
02/05/2021	US District Court for the District of Mass.	1:21-cv-10208-WGY	Plaintiffs: Groden et al. Defendants: C. Carney Recycling Solutions U, LLC	Alleged breach of collective bargaining agreement	Pending Cross Motions for Summary Judgment as a Case Stated	n/a
12/28/2020	US District Court for the District of Mass. (removed from state court)	1:20-cv-12287-RWZ	Plaintiffs: White et al. Defendants: Carney Recycling Solutions, LLC	Employment contract dispute	Dismissed	7/14/21
10/09/2019	Bristol County Superior Court	1973CV00943	Plaintiffs: C Carney Recycling Solutions, LLC. Defendants: LStar Southfield, LLC	Contract dispute	Decided	05/20/2021
04/10/2019	Plymouth County Superior Court	1983CV00382	Plaintiffs: Belt, Jonathan Defendants: Waste Management Inc. et.al.	Personal Injury / Property Damage	Dismissed	03/04/2021
08/20/2018	Plymouth County Superior Court	1883CV00889	Plaintiffs: C Carney Recycling Solutions, LLC et. al. Defendants: Atkinson-Whitwoth Corporation et. al.	Contract dispute	Dismissed	07/28/2020
10/03/2016	Norfolk County Superior Court	1683CV00968	Plaintiff: Recycling Solutions, Inc.	Contract dispute	Settled	02/02/2017

			Defendant: Allied Waste Services of Massachusetts, LLC d/b/a Republic Services of Marshfield & Allied Waste Services of Marshfield			
11/06/2015	Bristol County Superior Court	1573CV01055	Plaintiffs: Kay, Dennis Defendants: Recycling Solutions, LLC	Personal Injury / Property Damage	Dismissed	03/27/2017
07/05/2013	Norfolk County Superior Court	1382CV01001	Plaintiffs: Mayen, Jose et. al. Defendants: American Waste Services LLC et. al.	Contract dispute	Pending. Status Conference is scheduled for February 7, 2023. Bankruptcy of American Waste is still on going.	n/a
02/21/2013	Norfolk County Superior Court	1382CV00248	Plaintiffs: Albano, Obdulio Defendants: American Waste Services, LLC et. al.	Contract dispute	Settled	11/16/2016
09/06/2012	Plymouth Probate and Family Court	PL12D1420DR	Plaintiff: Carney, Brenda Jean Defendant: Carney, Christopher Lawrence	Divorce	Decided	01/22/2015
08/01/2012	Supreme Judicial Court of Massachusetts, Appeals Court of Massachusetts, Norfolk. One Pemberton Square, Boston, Massachusetts 02108	No. CV201201275; SJC-12842	Plaintiffs: Elmer Donis, Juan Floria, Melvin Grandos, Wilfrido Monterroso, Edgar Ruiz, Edvin Sambrano, Ismael Sabrano, Enrique Sarceno, Victor Serrano Defendants: American Waste Services, LLC, Christopher Carney, Michael Galvin.	Alleged violations of Wage Act and Prevailing Wage Act arising out of work on municipal waste disposal contracts	Decided	11/09/2021

07/31/2012	Superior Court Norfolk County	1282CV01265	Plaintiffs: Alfaro, Candido et. al. Defendants: American Waste Services LLC et. al.	Contract dispute	Pending. Status Conference is scheduled for February 7,2023. Bankruptcy of American Waste is still on going.	n/a
02/06/2012	Plymouth County Superior Court	1283CV00161	Plaintiffs: Equipment 4 Rent, Inc. Defendants: Champion City Recovery, LLC et. al.	Personal Injury / Property Damage	Dismissed	04/28/2014
11/14/2006	Plymouth County Superior Court	0683CV01339	Plaintiffs: New England Landfill Solutions, LLC et. al. Defendants: City of Brockton	Real Property Action	Dismissed	11/21/2011
05/02/2006	Bristol County Superior Court	0673CV00525	Plaintiffs: New England Landfill Solutions, LLC et. al. Defendants: B.A.T.G. Environmental, Inc. et. al.	Contract dispute	Dismissed	08/08/2007
03/23/2006	Suffolk County Civil Court	0684CV01240	Plaintiffs: National Reclamation of Raynham LLC Defendants: Donahue member et. al.	Appeal from Administrative Agency G.L. c. 30A	Decided	12/31/2008

Massasoit Greyhound Association, Inc.
Massachusetts Gaming Commission
Application for Category 2 Sports Wagering Operator License
January 2023

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. 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**

None.

Massasoit Greyhound Association, Inc.
Massachusetts Gaming Commission
Application for Category 2 Sports Wagering Operator License
January 2023

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***

None.

Massasoit Greyhound Association, Inc.
Massachusetts Gaming Commission
Application for Category 2 Sports Wagering Operator License
January 2023

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

Under their Operating Lease Agreement with Caesars Sportsbook, MGA and RPS will operate under internal controls established by Caesars Sportsbook. Caesars Sportsbook currently operates mobile and retail sports wagering in multiple jurisdictions, all of which have Internal Controls implemented for said operations. Attached as Exhibit G.3(i) is a confidential copy of Caesars Sportsbook's Internal Controls for its New Jersey retail sports wagering operations. All internal controls will meet 205 CMR 138 and 238 and other applicable regulations.

MASSASOIT GREYHOUND ASSOCIATION, INC.

APPLICATION FOR SPORTS WAGERING OPERATOR LICENSE

EXHIBIT G.3(i)

WILLIAM HILL NEW JERSEY, INC.
INTERNAL CONTROL STANDARDS
RETAIL SPORTS WAGERING

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WILLIAM HILL NEW JERSEY, INC.

Operators for the following Sports Wagering Licensees:



INTERNAL CONTROL STANDARDS

RETAIL SPORTS WAGERING

CONFIDENTIAL



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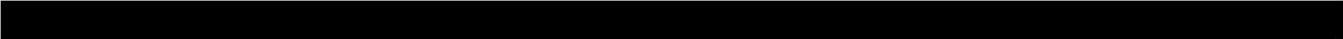
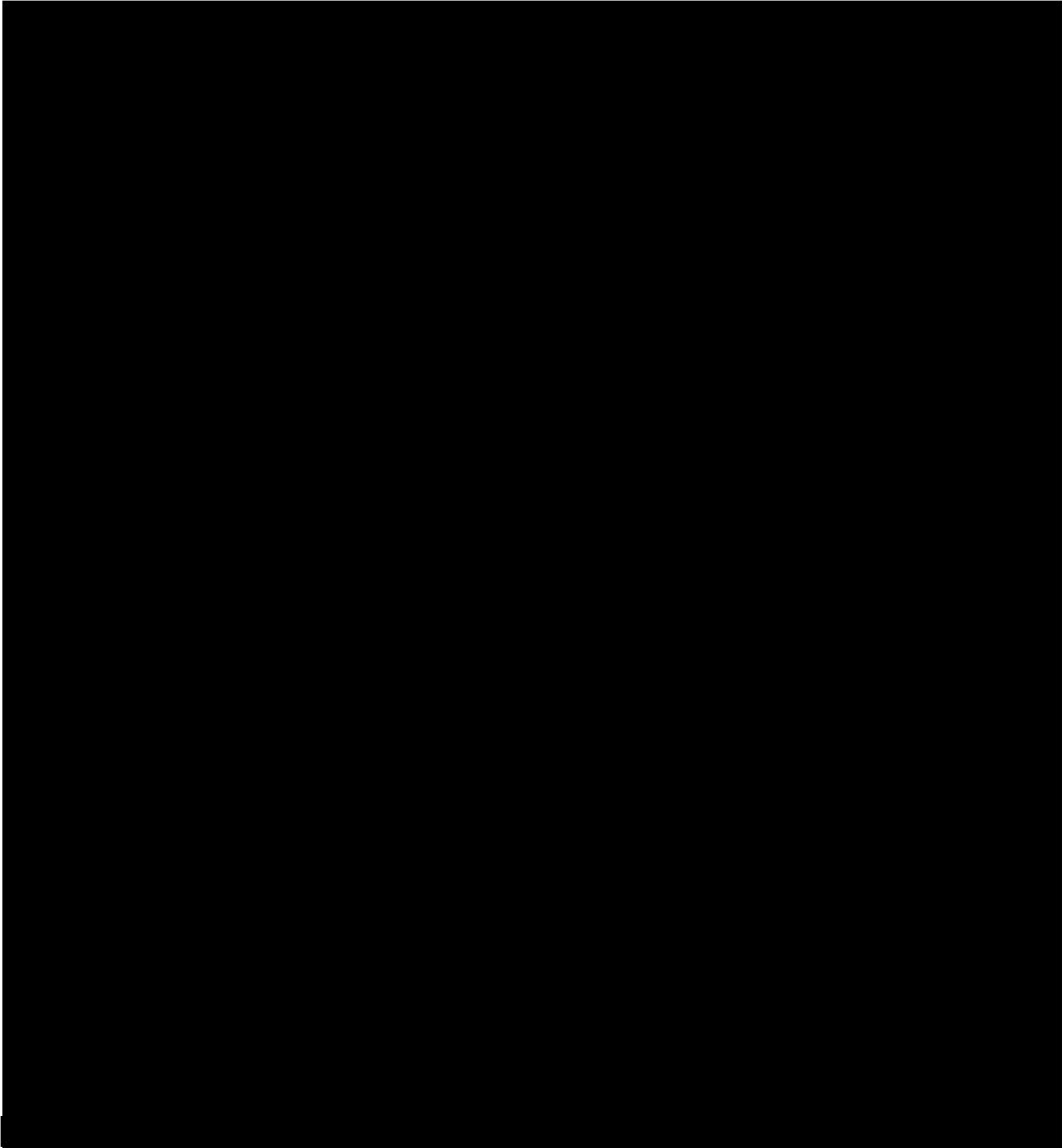
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FOR THE USE OF ITS MASSACHUSETTS APPLICATION FOR THE CATEGORY 2 SPORTS WAGERING OPERATOR LICENSE

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Massasoit Greyhound Association, Inc.
Massachusetts Gaming Commission
Application for Category 2 Sports Wagering Operator License
January 2023

G.4 COMPLIANCE

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

MGA's responses to each of the compliance questions contained in Section G.4 incorporates the following. While "Key Person" is not defined in Chapter 23N, the Commission's Regulations or the Sports Wagering Application, MGA understands it to be limited to those who may "control"¹ the applicant and therefore must meet all the qualifications for licensure, which for MGA includes George L. Carney, Jr., Christopher L. Carney and Joseph A. Cappucci. The compliance questions in this section therefore excludes any entity or individual that does not possess the requisite control that have not otherwise been designed a qualifier.² Such a plain reading of Section G.4 is reasonably consistent with Chapter 23N.

- a. Been employed by the Massachusetts Gaming Commission**
No.

- 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***
Massasoit Greyhound Association Inc. holds a simulcast license issued by the Massachusetts General Court and regulated by the Massachusetts Gaming Commission pursuant to Chapter 128C.

- c. Held or holds a direct, indirect, or attributed interest in any business that intends to apply for a license with the Commonwealth**
Massasoit Greyhound Association, Inc. does not hold a direct, indirect, or attributed interest in any business that intends to apply for a gaming license with the Commonwealth.

Raynham Park is operated under two simulcasting licenses (this was done to be able to operate the facility year-round rather than just 6 months of the year). One license is held by MGA, and the other is held by Taunton Dog Track, Inc., a Massachusetts corporation ("TDT"). MGA and TDT currently have a revenue-sharing agreement pursuant to which MGA compensates TDT for the use of its simulcasting license, and TDT compensates

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)

² To the extent section G.4. requires responses to Caesars Sportsbook, Massasoit Greyhound Association, Inc. does not have access to such records or information. Moreover, the Commission may refer to the application for a tethered category 3 mobile licensed application filed by Caesars Sportsbook, preliminarily approved on December 20, 2022.

Massasoit Greyhound Association, Inc.
Massachusetts Gaming Commission
Application for Category 2 Sports Wagering Operator License
January 2023

MGA for management of its simulcasting operations. As TDT is owned by the same ultimate beneficial owners as MGA, it may not apply for a sports wagering license pursuant to G.L. c. 23N sec. 6(b)(2) at this time.

- d. Withdrawn a gaming license application, in any jurisdiction – *if so, please submit a detailed description of each withdrawal***
No.
- 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. Please note that George L. Carney, Jr. was previously found suitable by the Massachusetts Gaming Commission in 2013 as a qualifier for Mass Gaming and Entertainment LLC.
- f. Had a gaming license suspended, in any jurisdiction – *if so, include a detailed statement regarding each suspension***
No.
- 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.
- 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.
- i. Been found unsuitable gaming license non-renewed or considered for non-renewal – *if so, provide a detailed description of the circumstances***
No.