



# Sports Wagering Operator & Vendor Scope of Licensing – Initial Survey

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

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

APPLICANT INFORMATION & DESCRIPTION	
<b>Company Name:</b>	Betfred Sports (Massachusetts) LLC
<b>D/B/A or Trade Name(s):</b>	Betfred, Betfred Sportsbook
<b>Corporate HQ Address:</b> <i>(Also include the address of any operation/s in Massachusetts)</i>	4530 S. Decatur Boulevard Suite 202 Las Vegas, NV 89103
<b>Point-of-Contact for Licensing Process:</b> <i>(Include NAME, POSITION, ADDRESS, PHONE, EMAIL)</i>	[REDACTED]
<b>Description of Business:</b>	Sports Wagering Operator/Provider - Turnkey operations for both retail and online sports books.
<b>Goods/Services you expect to provide in Massachusetts:</b>	Online sports wagering

APPLICANT ORGANIZATIONAL INFORMATION	
<b>Applicant Company Type:</b>	<input type="checkbox"/> Sole Proprietorship <input checked="" type="checkbox"/> LLC <input type="checkbox"/> Cooperative <input type="checkbox"/> C-Corporation <input type="checkbox"/> S-Corporation <input type="checkbox"/> Partnership <input type="checkbox"/> SEC Registrant <input type="checkbox"/> Other
<b>Publicly Traded? :</b>	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes <i>(if "Yes", Stock exchange symbol and exchange)</i>
<b>Applicant Financial Statements Type:</b>	<input checked="" type="checkbox"/> Audited <input type="checkbox"/> Reviewed <input type="checkbox"/> Consolidated <input type="checkbox"/> Internally Compiled <input type="checkbox"/> Externally Compiled <input type="checkbox"/> Supplemental <input type="checkbox"/> Other



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<b>Applicant Tax Returns:</b>	<input type="checkbox"/> Stand-Alone <input checked="" type="checkbox"/> Consolidated <i>(with)</i> <div style="text-align: center;">Betfred USA Sports LLC</div>
<b>Management Structure:</b> <i>(Do you have any of the following?)</i>	<input checked="" type="checkbox"/> Compliance Committee <input type="checkbox"/> Audit Committee <input checked="" type="checkbox"/> Compliance Plan <input type="checkbox"/> Other(s)

### ATTACHMENTS

**PLEASE SUBMIT THE FOLLOWING INFORMATION**

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

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

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

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

## TABLE OF ORGANIZATION

Attached is a complete table of organization for Betfred Group Ltd, the ultimate parent holding company of Betfred Sports (Massachusetts) LLC.

The table is color coded and indexed to describe the entities and what each color means. None of the companies within this structure are publicly traded.

The following entities on the chart engage in sports wagering:

- Tote Bookmakers Limited
- Done Brothers (Cash Betting) Limited
- Petfre (Gibraltar) Limited
- Kerching (Gibraltar) Limited
- Lottostar (Pty) Limited
- Betting World (Pty) Limited
- Sepels Best Bets Proprietary Limited
- Sepels Sportsbet Gauteng Proprietary Limited
- Betfred Sports (Louisiana) LLC
- Betfred Sports (Arizona) LLC
- Betfred Sports (Washington) LLC
- Betfred Sports (Pennsylvania) LLC
- Betfred Sports (Iowa) LLC
- Betfred Sports (Colorado) LLC

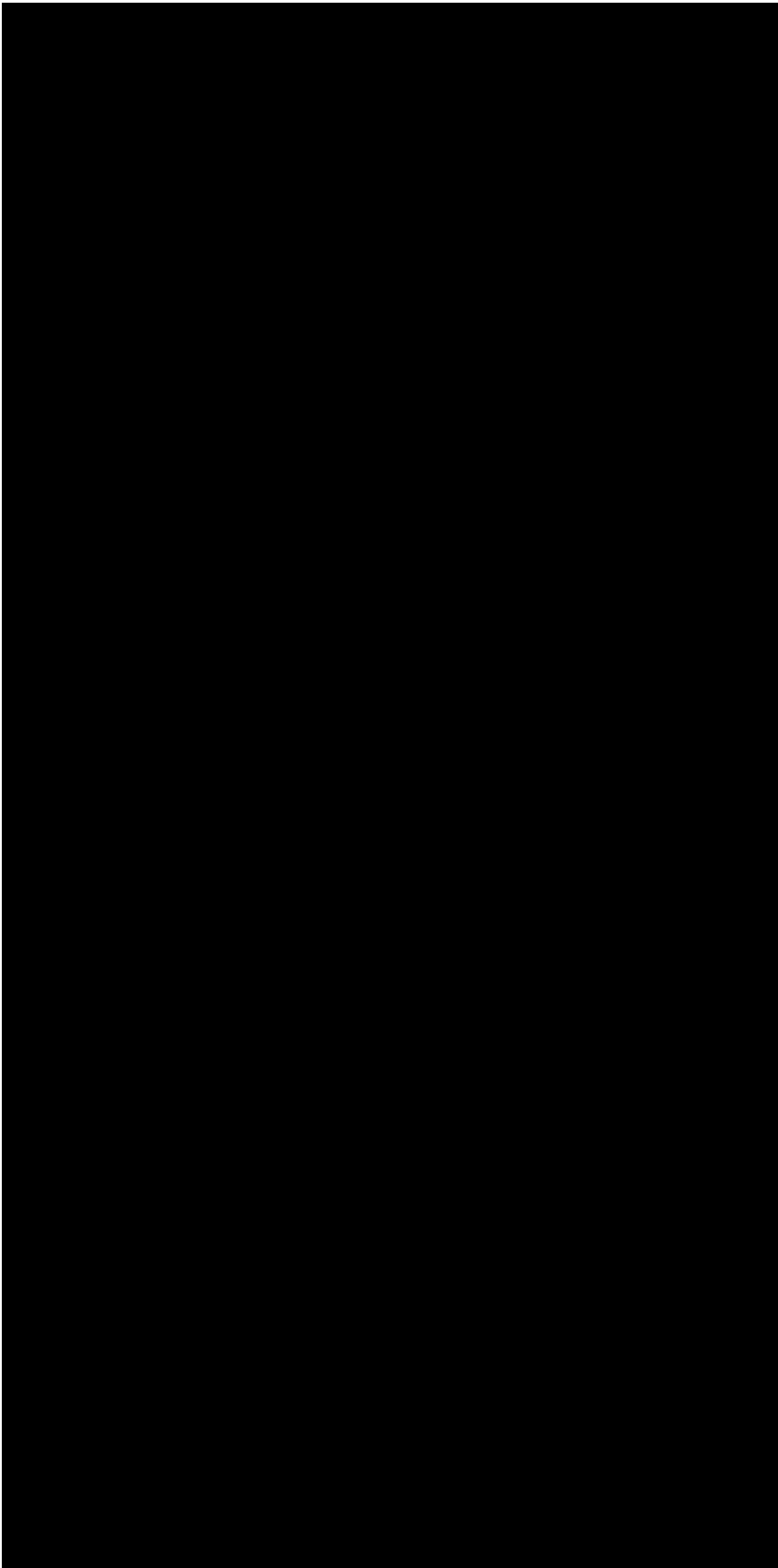
NOTE: Betfred Spain, SA was a sports trading entity, but Betfred recently ceased doing wagering in Spain.



## **TABLE OF OWNERSHIP INTERESTS**

Betfred Sports (Massachusetts) LLC is wholly owned by Betfred USA Sports (Two) LLC which is wholly owned by Betfred USA Sports LLC which is wholly owned by Betfred International Holdings Ltd which is wholly owned by Lightcatch Ltd which is wholly owned by Betfred Group Ltd.

This first attachment shows this direct line of ownership.



## **FUNCTIONAL TABLE OF ORGANIZATION**

Attached is the organizational chart which includes the executive team and the Board of Directors for Betfred Sports (Massachusetts) LLC. Mark Stebbings and Nicola Barr are Managers of the Massachusetts entity, as well as serving their roles for Betfred Group. Nobody on this chart holds any ownership percentage in Betfred Sports (Massachusetts) LLC or in Betfred Group Ltd – the ultimate parent holding company.

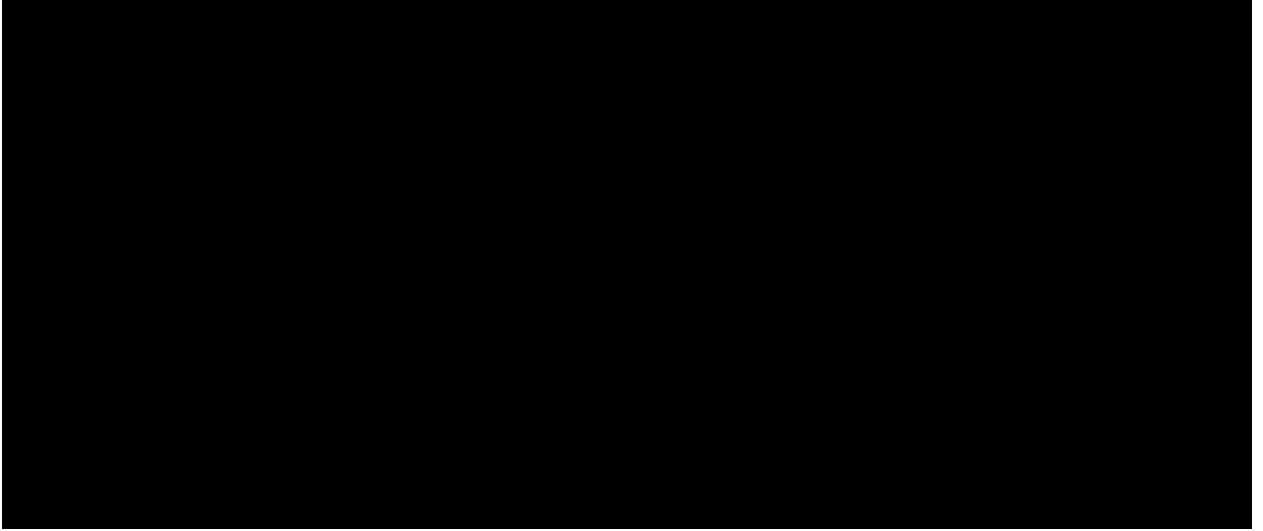
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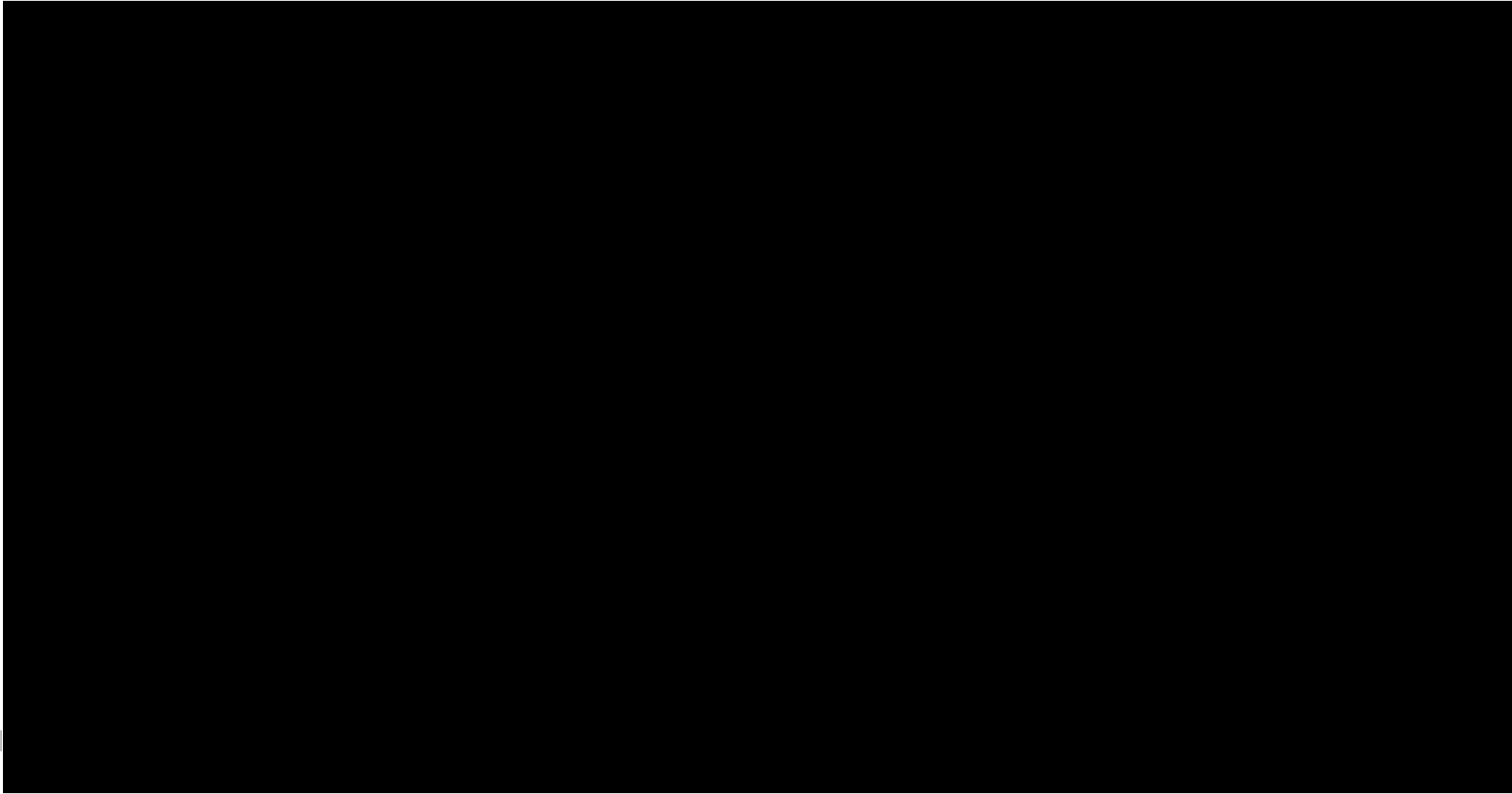
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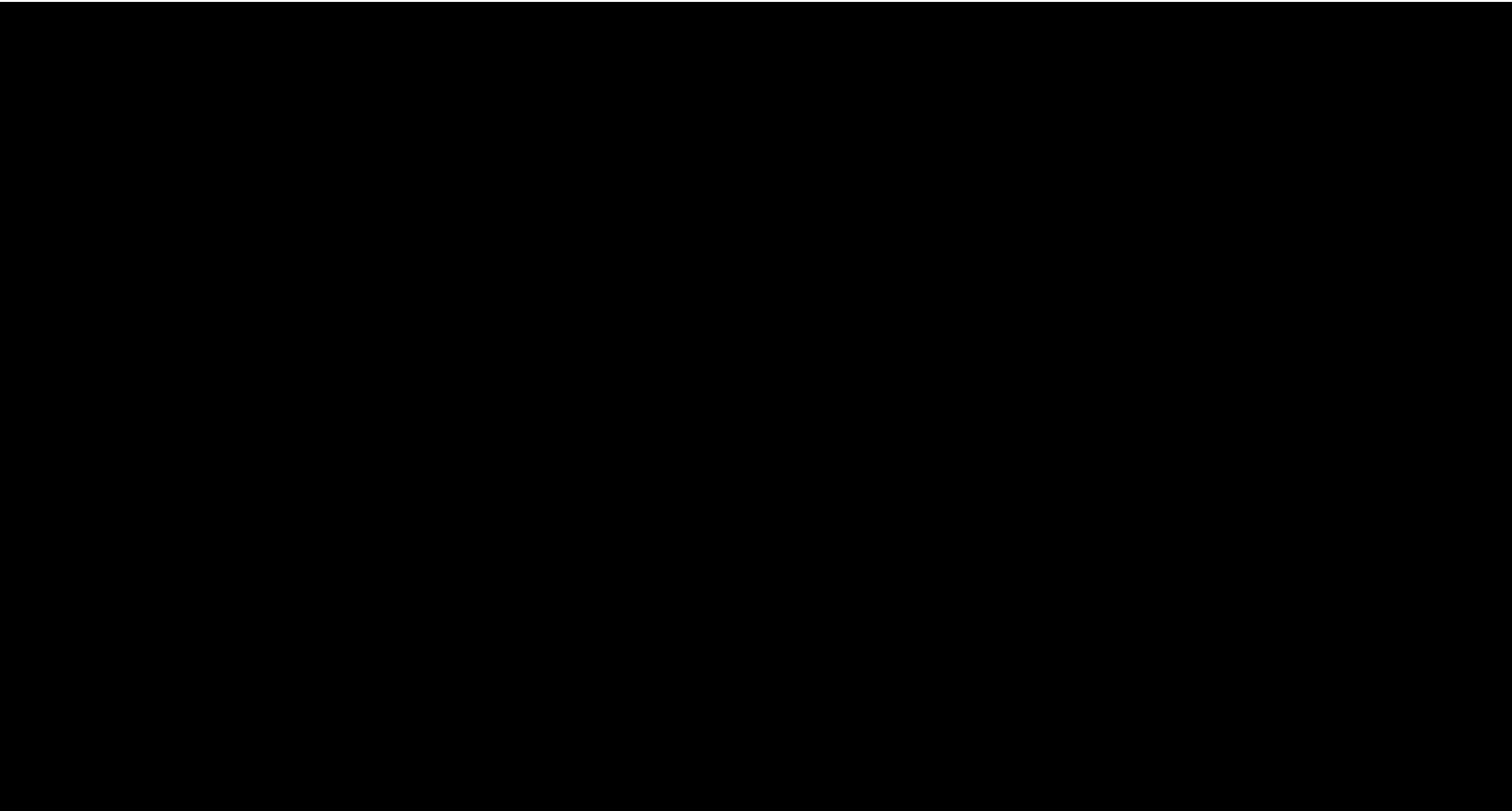


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## **INSTITUTIONAL INVESTORS**

Betfred Group Ltd. is a privately held company and there are no institutional investors.

## LICENSING HISTORY

Betfred Sports (Massachusetts) LLC has not applied for any licensure in any State. The entity was created for sports betting solely in Massachusetts.

The most recent licenses obtained for other state entities wholly held by Betfred USA Sports LLC are listed below.

### **Washington State Gambling Commission**

Betfred Sports (Washington) LLC

Major Sports Wagering Vendor License (License Number 10-00006)

Issued 1/26/22. Expires 12/31/22.

Retail sports wagering.

### **Lummi Tribal Gaming Agency**

Betfred Sports (Washington) LLC

Vendor License (License Number 916)

Issued 1/27/22. Expires 1/26/23.

Retail sports wagering

NOTE: Both State and Tribal licenses were required to offer sports betting in Washington

### **Maryland Lottery and Gaming Control Commission**

Betfred Sports (Maryland) LLC

Sports Wagering Facility Operator License

Issued 8/10/22.

This license covers retail sportsbook operations.

License expires 8/9/2027.

Online Wagering License Application submitted in September 2022.

### **Ohio Casino Control Commission**

Betfred Sports (Ohio) LLC

Mobile Management Services Provider License

Granted via OCCC Resolution 2022-67

License goes into effect 1/1/23. Expires 12/31/2027

## **LICENSEE ASSOCIATION**

Betfred Sports (Massachusetts) LLC has not entered into any agreements or negotiations with any Massachusetts Licensees at this time.

**ON-SITE PERSONNEL**

This question does not apply.