

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



APPLICANT NAME: Blue Tarp reDevelopment, LLC d/b/a MGM Springfield

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MGM Springfield

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.

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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.

SECTION A: GENERAL INFORMATION

A.1 APPLICANT NAME

Blue Tarp reDevelopment, LLC d/b/a MGM Springfield
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)

- N/A
 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

One MGM Way
Number and Street Address

Springfield, MA 01103
City, State, & Zip Code

(413) 273-5864
Phone Number

dmiller@mgmspringfield.com
Email Address

https://mgmspringfield.mgmresorts.com
Website

A.7 APPLICANT PRINCIPAL PLACE OF BUSINESS INFORMATION

One MGM Way
Number and Street Address

Springfiled, MA 01103

City, State, & Zip Code

dmiller@mgspringfiled.com

Email Address

(413) 273-5864

Phone Number

A.7 PRIMARY CONTACT FOR THIS APPLICATION

Dan Miller

Name

dmiller@mgspringfield.com

Email Address

Compliance Director

Title

(413) 273-5864

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)

Not applicable.

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 N/A
- b. Overview of wagering activity N/A
- c. Estimated volume of wagering activity (*annually*) N/A
- d. Jurisdictions where the platform is currently licensed and operating N/A
- e. Current integration in use with other wagering operators N/A
- f. The number of user accounts maintained N/A
- g. Estimated market share within each jurisdiction N/A

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

Not applicable.

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

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)

Not applicable.

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*) N/A
- b. A detailed timeline of construction N/A
- 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 N/A
- d. Approximate square footage of the sports wagering area N/A
- e. Secure location for storing funds issued by a cage, to be used in the operation, including all security measures and procedures N/A
- 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. N/A
- g. Reasonable measures the applicant will take to ensure the safety and security of all employees and patrons of any sports wagering-related events N/A
- 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 N/A
- i. Number and location(s) of ticket window(s) N/A
- j. Number and location(s) of wagering kiosk(s) N/A
- k. Location and display format for all wagers, available to the public N/A
- l. Location of posting of house rules N/A
- m. *If applicable* – description regarding any proposal of providing food, beverages, and other concessions to patrons N/A

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.
N/A

Please provide a thorough description, including the following:

- n. How the applicant proposes to realize the required capital investment N/A
- o. The financial commitments and guarantees the applicant is prepared to provide the Commission N/A
- 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 N/A
- q. Any mitigation measures the applicant will take to reduce any impact on the local community N/A

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: Blue Tarp reDevelopment, LLC d/b/a
MGM Springfield

SIGNATURE FORMS

VERIFICATION AND AUTHENTICATION

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

The applicant, _____, 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.

Augustine Kim

Name of Authorized Individual

VP & Legal Counsel

Position with Applicant

Augustine Kim Digitally signed by Augustine Kim
Date: 2022.11.22 23:31:42 -05'00'

Signature of Authorized Individual

11-22-2022

Date

ATTESTATION

I, **Augustine Kim**, on behalf of **Blue Tarp reDevelopment, LLC d/b/a MGM Springfield** 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.

Augustine Kim

Name of Authorized Individual

VP & Legal Counsel

Position with Applicant

Augustine Kim

Digitally signed by Augustine
Kim
Date: 2022.11.22 23:32:48 -05'00'

Signature of Authorized Individual

11-22-2022

Date

WAIVER OF LIABILITY

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

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.

Augustine Kim

Name of Authorized Individual

VP & Legal Counsel

Position with Applicant

Augustine Kim

Digitally signed by Augustine
Kim
Date: 2022.11.22 23:33:31 -05'00'

Signature of Authorized Individual

11-22-2022

Date



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

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

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

a. Background in sports wagering

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



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Massachusetts Gaming Commission
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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

Blue Tarp reDevelopment, LLC d/b/a MGM Springfield ("MGMS") intends to offer its sports wagering product in close coordination with BetMGM, LLC ("BetMGM"). BetMGM has an abundance of experience in both mobile and retail sports wagering operations across North America. The organization has been thoroughly vetted and issued both sports betting and igaming licenses by 27 regulatory bodies, to date. Several of BetMGM's executives and employees have similarly been found suitable by gaming regulatory bodies across North America.

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



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Massachusetts Gaming Commission
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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

Blue Tarp reDevelopment, LLC d/b/a MGM Springfield ("MGMS") intends to offer its sports wagering product in close coordination with BetMGM, LLC ("BetMGM"). MGM Resorts International ("MGMRI") works closely with BetMGM across the US, particularly in states where MGM has a physical retail presence. BetMGM's experience as a leading online sports wagering operator, coupled with MGM's brand recognition and industry experience, produce a best-in-class offering to our customers.

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



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

Blue Tarp reDevelopment, LLC d/b/a MGM Springfield ("MGMS") will limit its sports wagering offerings to the events, wager-types, and markets approved by the Massachusetts Gaming Commission (the "Commission"). BetMGM is experienced in offering sports wagering tailored to specific jurisdictional requirements. MGMS, in conjunction with BetMGM, will use the same general processes and controls employed in the 25 jurisdictions BetMGM currently operates in to mitigate risk of an unapproved offering. To the extent required, MGMS will develop processes or controls to comply with any unique Massachusetts requirements that are not fully addressed through its existing processes and controls.



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

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

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

Blue Tarp reDevelopment, LLC d/b/a MGM Springfield (“MGMS”) has constructed a first-class Sports Wagering lounge with stadium seating, a 45ft viewing wall, as well as an enclosed wagering counter and space for wagering kiosks. The area is positioned close to our Main St entrance/exit, along with many other immediately accessible gaming and non-gaming amenities, such as slots, table games, Island Bar and Costa restaurant.

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

Please refer to the application of BetMGM, LLC for information regarding promotions and offers.



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

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

b. Overview of wagering activity

Based on success in other jurisdictions, Blue Tarp reDevelopment, LLC d/b/a MGM Springfield (“MGMS”) will offer in-person Sports Wagering by staff operated points of sale at the wagering counter, and through automated kiosks. Regarding automated kiosks, wager odds and writing software is the same for these and the point-of-sale machines. This way, we can provide a consistent and fair wagering experience across the different desired channels. MGMS will install automated kiosks close to the lounge. For better guest service and convenience MGMS will also install kiosks in other locations around the gaming area.



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





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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





**Blue Tarp reDevelopment, LLC d/b/a MGM Springfield
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SECTION C: ECONOMIC IMPACT ON THE COMMONWEALTH

C.1 EMPLOYMENT OPPORTUNITIES WITHIN THE COMMONWEALTH

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

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

As of Q3 2022, BlueTarp reDevelopment, LLC d/b/a MGM Springfield (“MGMS”) employs a total of 1,330 employees.* Of those employees, 878 are full-time, 278 are part-time, and 174 are on call employees.

*Includes MGM Springfield team members employed at the MassMutual Center.



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

BlueTarp reDevelopment, LLC d/b/a MGM Springfield (“MGMS”) currently operates one work location within the Commonwealth.



**Blue Tarp reDevelopment, LLC d/b/a MGM Springfield
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Application for Category 1 Sports Wagering Operator License
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C.1 EMPLOYMENT OPPORTUNITIES WITHIN THE COMMONWEALTH

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

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

Upon approval for licensure by the Commission, BlueTarp reDevelopment, LLC d/b/a MGM Springfield (“MGMS”) proposes creating seven (7) new full-time positions and six (6) new part-time positions. Please refer to Section C.1(d) for further information.



**Blue Tarp reDevelopment, LLC d/b/a MGM Springfield
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C.1 EMPLOYMENT OPPORTUNITIES WITHIN THE COMMONWEALTH

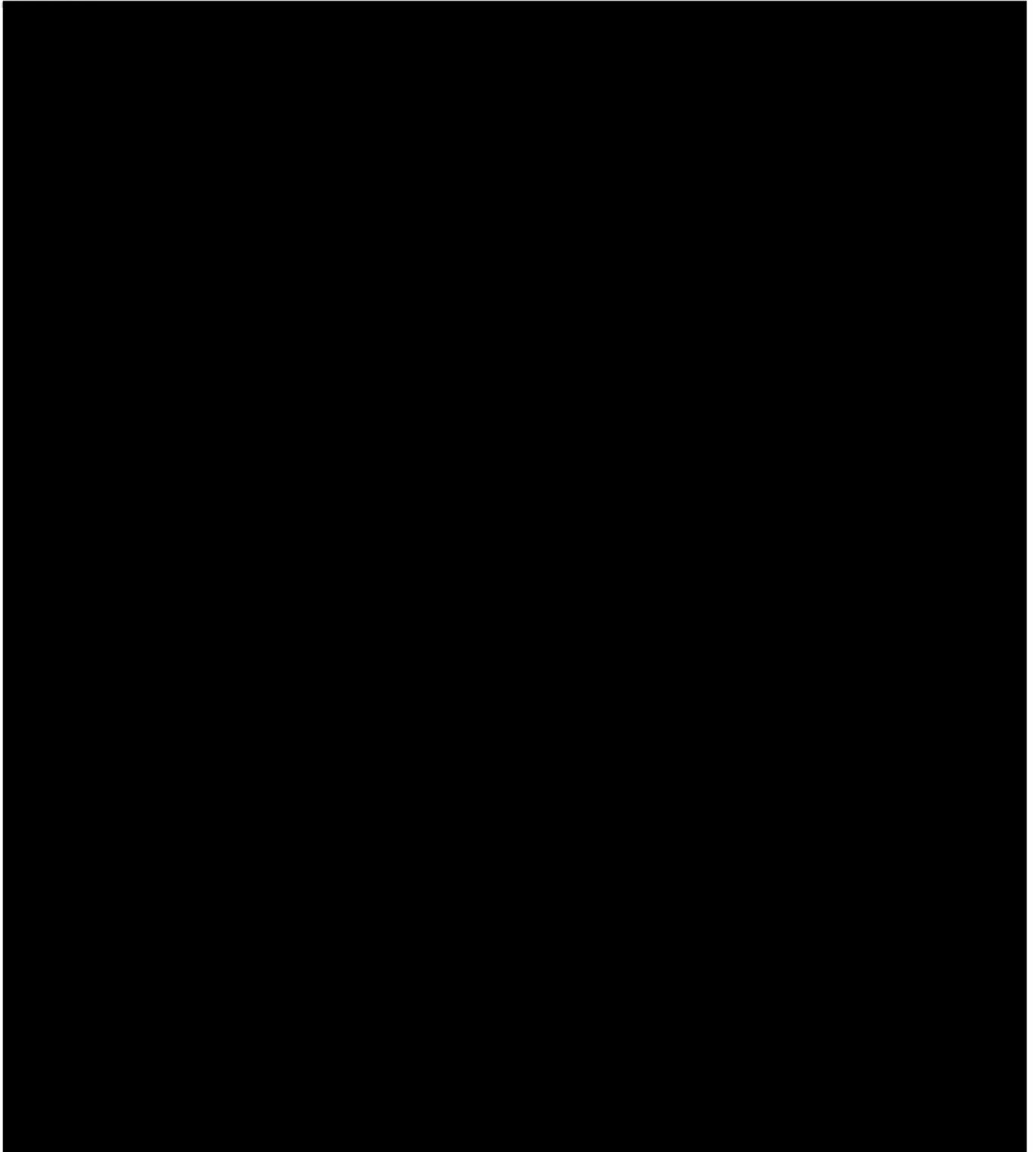
Provide a thorough description of the employment opportunities that will be offered if the applicant is approved for licensure by the Commission. This should include the following:

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





**Blue Tarp reDevelopment, LLC d/b/a MGM Springfield
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C.1 EMPLOYMENT OPPORTUNITIES WITHIN THE COMMONWEALTH

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

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

Our partner, BetMGM, will lead training for the proposed positions including training on staff operated point of sale systems, how to take and pay bets, and use and maintenance of the automated kiosks.



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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

BlueTarp reDevelopment, LLC d/b/a MGM Springfield (“MGMS”) will operate one work location within the Commonwealth.



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

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



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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:

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

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

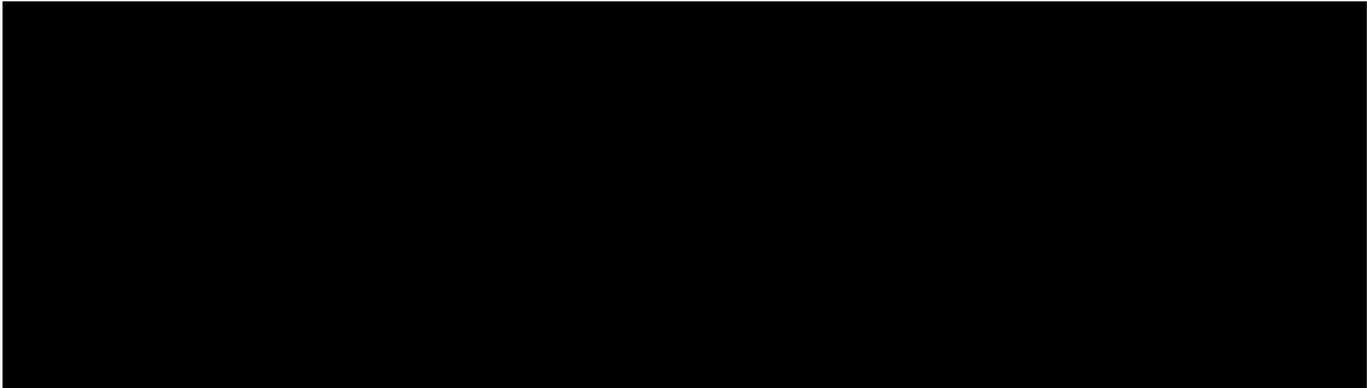


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C.2 PROJECTED REVENUE

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:

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





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

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

BlueTarp reDevelopment, LLC d/b/a MGM Springfield, as a Category 1 licensee, reports non-sports wagering revenues daily. Please refer to MGM Springfield's revenue reports filed with the Massachusetts Gaming Commission.

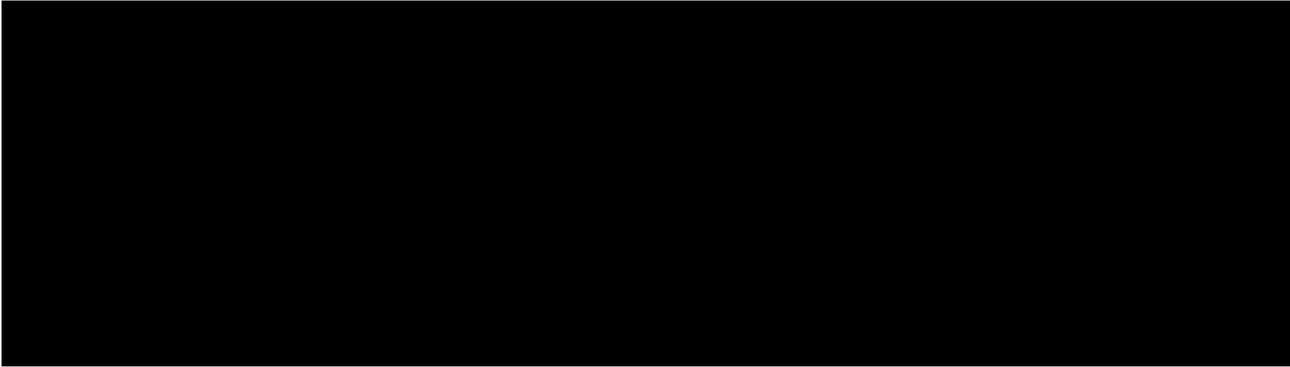


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C.2 PROJECTED REVENUE

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:

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





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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:

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

Please refer to the application of our partner, BetMGM, LLC (“BetMGM”), for an analysis regarding profitability of sports wagering operations in other jurisdictions.



Blue Tarp reDevelopment, LLC d/b/a MGM Springfield
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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:

- 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***

Please refer to the application of our partner, BetMGM, LLC (“BetMGM”), for BetMGM’s operating performance versus revenue projections for the last five years.



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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:

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

BlueTarp reDevelopment, LLC d/b/a MGM Springfield will leverage the current customer database, brand, and gaming operator expertise in alignment with BetMGM to offer the best sports wagering experience to the Commonwealth, creating a seamless experience between our retail sports wagering operations and our partnership with our mobile platform, BetMGM.



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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:

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

Please refer to Section E2 Advertising and Promotional Plans for our plans to compete with other nearby jurisdictions and to market to Massachusetts patrons.



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

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

a. A detailed timeline of construction

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



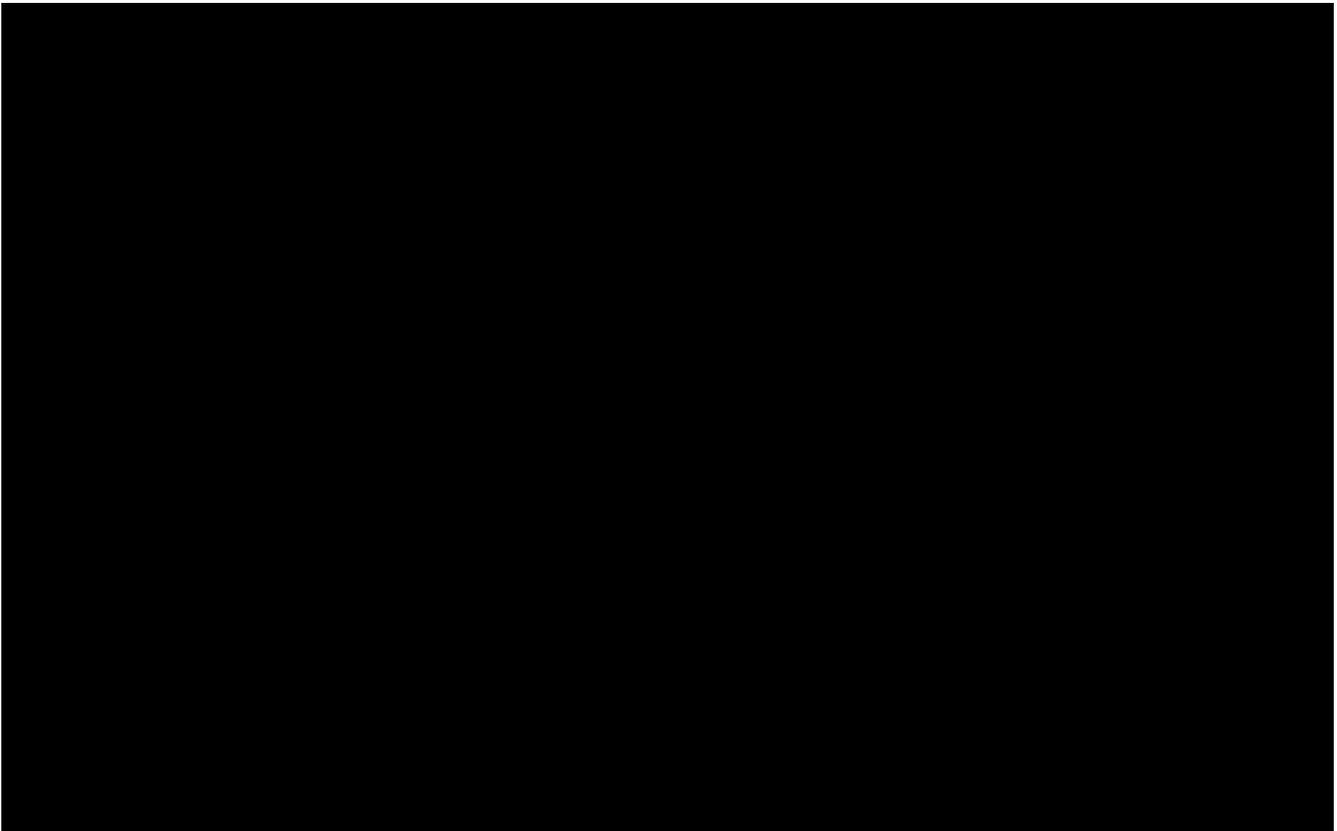
Blue Tarp reDevelopment, LLC d/b/a MGM Springfield
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C.3 CONSTRUCTION – GAMING ESTABLISHMENTS (for Category 1 Applicants Only)

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

- 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**

The sports wagering area is located within the predetermined Gaming Area in the Northwest corner of the Gaming Establishment as depicted below.





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

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

c. Approximate square footage of the sports wagering area

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



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

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

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

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

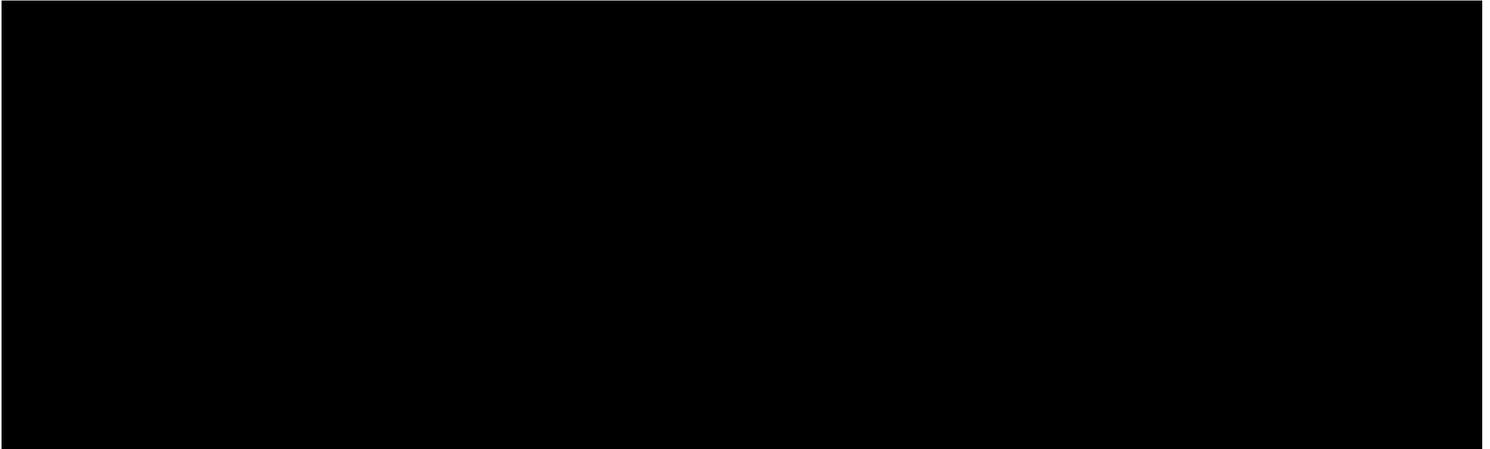


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C.3 CONSTRUCTION – GAMING ESTABLISHMENTS (for Category 1 Applicants Only)

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

- 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.





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

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

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





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

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

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

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



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

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

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

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



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

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

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

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



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

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

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

All odds and wagers available will be displayed on ten (10) screens above the teller's windows.



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

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

k. Location of posting of house rules

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



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

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

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

Not applicable, no food or beverages to be served within the Sports Wagering area. Guests with beverages they already purchased at one of our bars or received while gaming at Tables and Slots, may bring them into the area.



**Blue Tarp reDevelopment, LLC d/b/a MGM Springfield
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C.5 COMMUNITY ENGAGEMENT

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

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

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

MGM Springfield includes several local businesses in our comp program and/or support through our corporate purchasing processes. Examples include Hannoush Jewelers and Walhburgers Restaurant by comping directly to these outlets, as well as allowing guests to redeem their MGM Rewards points at both. We also incorporate a Standard Purchasing Program with local businesses, from our dry cleaner to our niche in-room amenities, to local micro brews that take part in resort VIP events.

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

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



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With respect to the local lottery, BetMGM's expansion into Massachusetts will have the effect of expanding the legal gambling industry within the state rather than cannibalizing the revenues from the Massachusetts State Lottery. By expanding legal gambling offerings within the state, the residents of Massachusetts will no longer be forced to travel to a neighboring state in order to legally gamble. This will keep individuals interested on legally gambling within the state of Massachusetts, and will ultimately have a positive impact on the Massachusetts State Lottery.

All marketing efforts made by BetMGM within the state of Massachusetts are specific to mobile sports wagering. The product offering is entirely distinct from that which is offered by Massachusetts State Lottery. At this time, BetMGM does not have a commercial relationship with the Massachusetts State Lottery that would produce significant partnership and collaboration.



SECTION D: DIVERSITY, EQUITY, & INCLUSION

D.1 DIVERSITY, EQUITY, & INCLUSION – WORKFORCE

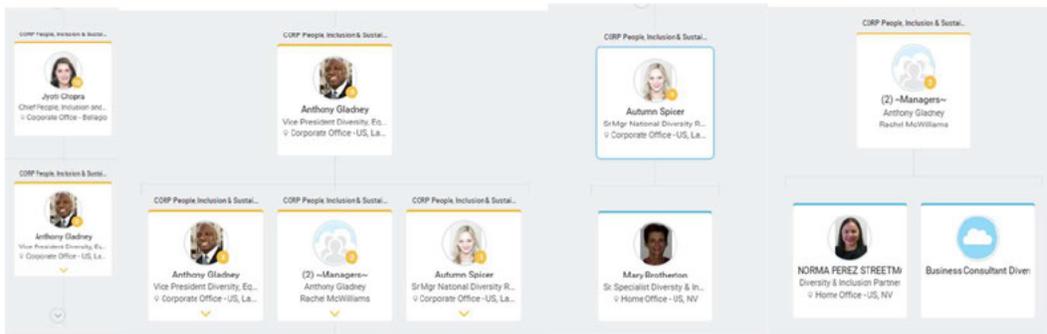
Provide a thorough description of the applicant’s willingness to foster racial, ethnic, and gender diversity, equity, and inclusion, within their workforce, both at the corporate level and the proposed entity within the Commonwealth. The information must include:

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

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

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

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





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D.1 DIVERSITY, EQUITY, & INCLUSION – WORKFORCE

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

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

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

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

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

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

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

**FOSTERING DIVERSITY & INCLUSION
2025 ASPIRATIONS**

DIVERSE ENGAGEMENT

Spend with diverse suppliers at least 10% of our domestic biddable procurement

TALENT MANAGEMENT

Train 100% of management employees on corporate social responsibility policies and goals

DIVERSE & INCLUSIVE WORK CULTURE

Ensure that all employees – including women, the LGBTQ+ community, people of color and people with disabilities – have equal access to leadership opportunities throughout MGM Resorts and that our policies of inclusion are embedded into our culture

DIVERSE ENGAGEMENT

Expand our individualized Supplier Diversity Mentorship Program to achieve a cumulative milestone of 50 graduates of diverse suppliers among our host communities



Companies with diverse and inclusive workforces, suppliers, and customers outperform their non-diverse peers.

MGM Resorts is committed to developing and enhancing talent management systems that ensure equal access to employment and career growth opportunities for all. Through education and training, we will continue to create welcoming, inclusive environments where diverse ideas and perspectives lead to innovative and creative solutions to drive business growth and expand Company goodwill around the world.



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D.1 DIVERSITY, EQUITY, & INCLUSION – WORKFORCE

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

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

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

- Minority: 51%
- Veteran: 5%
- Women: 40%
- Springfield Resident: 39%



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D.1 DIVERSITY, EQUITY, & INCLUSION – WORKFORCE

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

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

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

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



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D.1 DIVERSITY, EQUITY, & INCLUSION – WORKFORCE

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

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

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

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

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



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

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

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

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

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

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

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

Our sports betting partner, BetMGM established its supplier diversity vendor, Suplier.io, last month, and is working to solidify its diversity supplier procurement goals by Q1 2023. The Procurement and Business Units will be sourcing DEI related vendors to participate in RFP, RFQ, and tenders. During these events, BetMGM will be emphasizing a DEI weight in the scoring process. Further details regarding BetMGM's commitment to DEI initiatives in its supplier spend are outlined in BetMGM's DEI Policy, attached in whole to BetMGM's application for licensure and incorporated by reference herein, and reproduced in relevant part below:

VI. Diversity in Procurement

The Company is committed to a comprehensive supplier diversity program. Diversity and Inclusion is a business imperative that provides measurable benefits to our company as well as the extensive number of diverse owned businesses with whom we forge alliances. To ensure that no opportunity is lost, we are dedicated to identifying and building ongoing relationships with business enterprises owned by minority, women, disadvantaged, veterans/ service disabled veterans, persons with disabilities or lesbian, gay, bisexual and transgender persons that can provide our company with high-quality products, superior service and competitive prices.

Any requisition line item that is greater than \$100,000 in value must be competitively bid in the marketplace to gain the best value for the purchase, regardless of whether a supplier of the good/service sought already has an existing contract or agreement with the Company. Each bid must have three quotes from different suppliers to support the selection of the supplier for that purchase. Reasonable best efforts must be made to include at a minimum one Certified Diverse Enterprise in the bidding process.

Efforts Company Procurement Department personnel may use to identify and potentially engage diverse suppliers include:

- Post opportunities for bidding on Company website



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- Make connections with diverse bidders through chambers of commerce, community resource partners or other organizations
- Attend/sponsor meetings and conferences of organizations with diverse supplier/contractor membership, or other organizations that attract diverse supplier/contractor attendees
- Host townhall meetings or expositions to meet diverse suppliers/contractors



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

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

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

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

- 50% gender split in the company
- 73% racially and ethnically diverse talent in the company
- As of December 31, 2021, 46.4% of management employees were racially and ethnically diverse. Please refer to the our Social Impact & Sustainability Metrics & Goals (available at: <https://www.mgmresorts.com/content/dam/MGM/corporate/csr/disclosures/2021-report-metrics.pdf>) for further information.
- 11 Directors
 - 2 Diverse
 - 9 non-Diverse
 - 18.2% Racially Diverse Board Members
 - 36.4% Directors are Female
 - 4 Female
 - 7 Male
 - Please refer to our 2022 Proxy Statement filed with the SEC for additional information (available at: <https://d18m0p25nwr6d.cloudfront.net/CIK-0000789570/061230a0-c0d7-449e-9ca9-38d0ef788923.pdf>).
- Leadership – Executive Management Team
 - Bill Hornbuckle – CEO & President
 - Corey Sanders – COO
 - Jonathan Halkyard – CFO & Treasurer
 - John McManus – Chief Legal & Administrative Officer and Secretary
 - Jyoti Chopra – Chief People, Inclusion & Sustainability Officer
 - Steve Zanella – Chief Commercial Officer
 - Gary Fritz – President of MGM Resorts International Interactive
 - Ayesha Molino – Senior Vice President of Public Affairs



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

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





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

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



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

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

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

The following is an outline of our external DEI Initiatives:

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

The following is an outline of our internal DEI Initiatives:

- i. **Employee Network Groups** – A decade old program that is MGM’s largest employee program with over 20 chapters and 7,000 members, across our Las Vegas properties, Detroit, Biloxi, Springfield, Northfield Park. The goal of ENGs is to connect employees, expand understanding of backgrounds and perspectives, provide career development opportunities, host volunteer events and encourage employees to take on leadership roles. The mission of the program “You do not need to be one of to stand with.”
- ii. **Mentorship Program** – A highly requested program that launched in 2021 with 300 participants and grew to over 1,000 in one year. This program intentionally matches employees across the company based on preferences related to job function, location and career goals. Employees are given virtual resources, learning plans and video sessions to prepare both the mentor and the mentee for a successful relationship. Sessions are 6 months long in the formal program and encouraged to continue post program.
- iii. **Learning and Development** – A partnership between L&D and DEI to provide our leaders of people with curriculum around key DEI topics to instill an inclusive culture. Five courses were launched in 2022: Social Impact & Sustainability Introduction, Six Traits of Inclusive Leadership,



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Unconscious Bias, LGB Understanding and Transgender Awareness, and Anti-Human Trafficking. This partnership is assessed every year to ensure we are focusing on key areas and transformational learnings.

- iv. **Diversity Dashboards** – A program created to streamline our people data to our senior level leaders through technology. Allowing our executives to have access opens their knowledge to gaps in gender and diverse representation and initiates conversations to identify high potential talent in real time.



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SECTION E: RESPONSIBLE GAMING

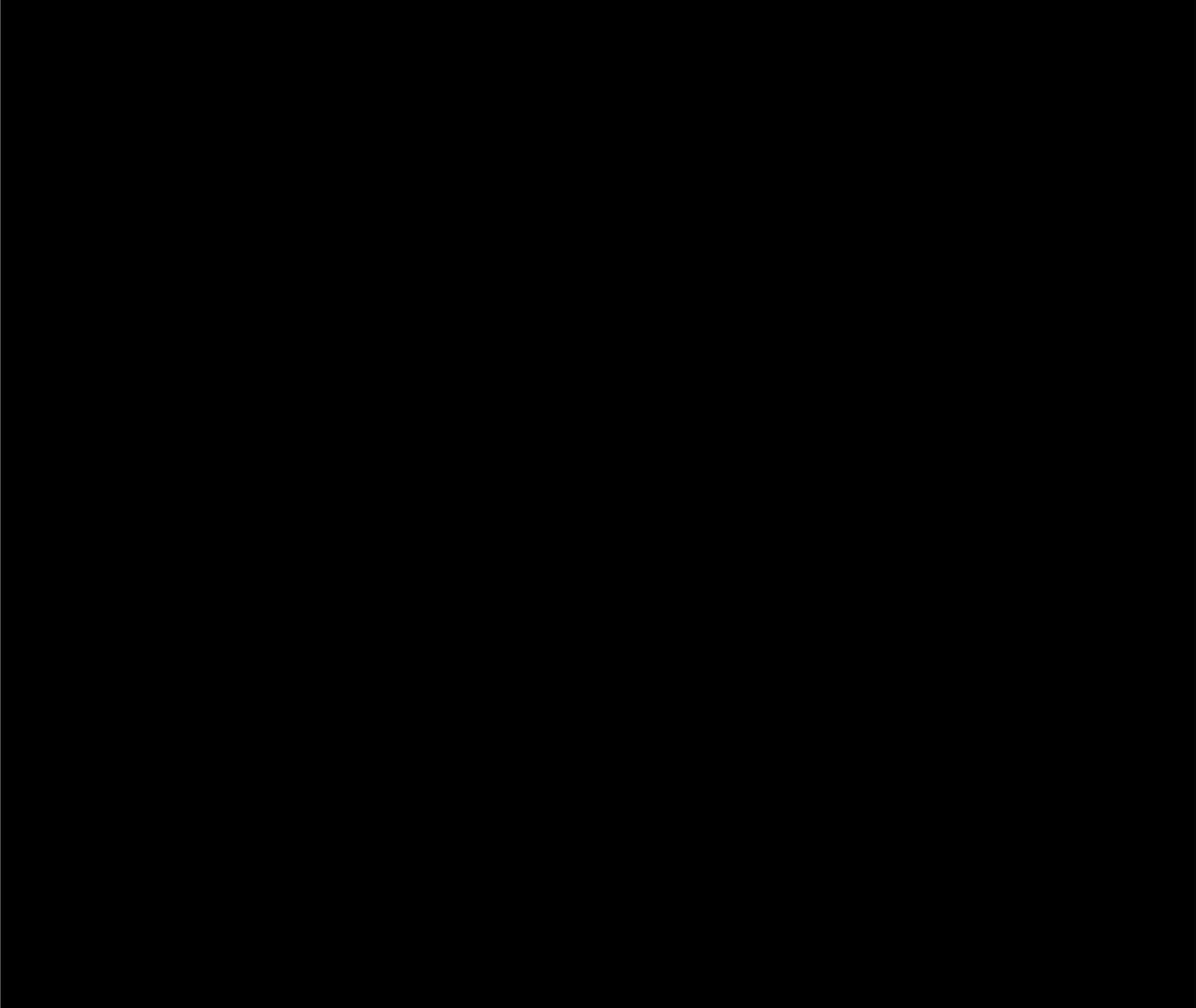
E.1 RESPONSIBLE GAMING POLICIES

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

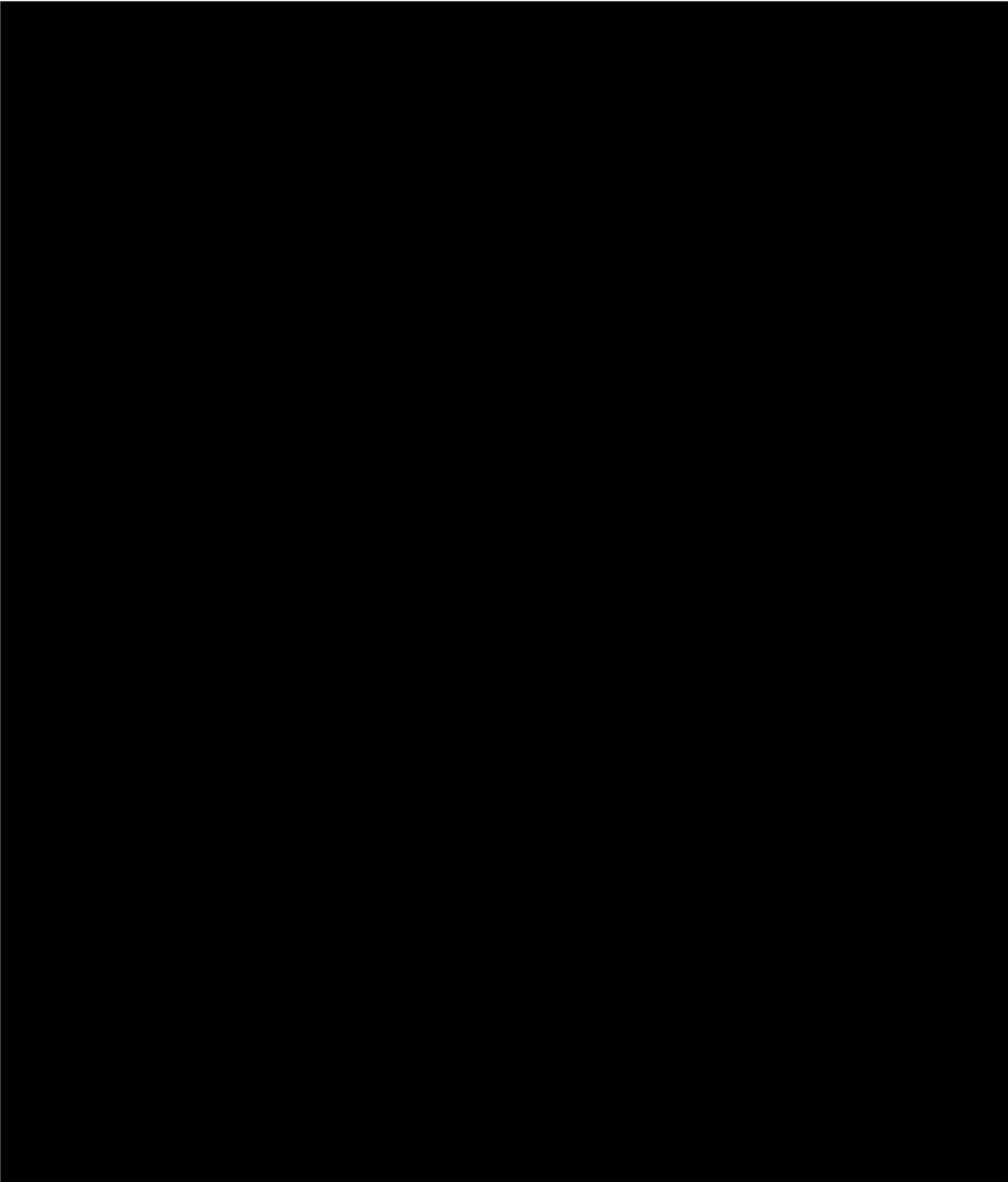
- a. Commitment to corporate social responsibility**
- b. Support positive play**
- c. Promote public health and safety**
- d. Ensure responsible advertising and marketing**
- e. Manage high-risk financial transactions**
- f. Engage the community**
- g. Commitment to improvement and reporting**

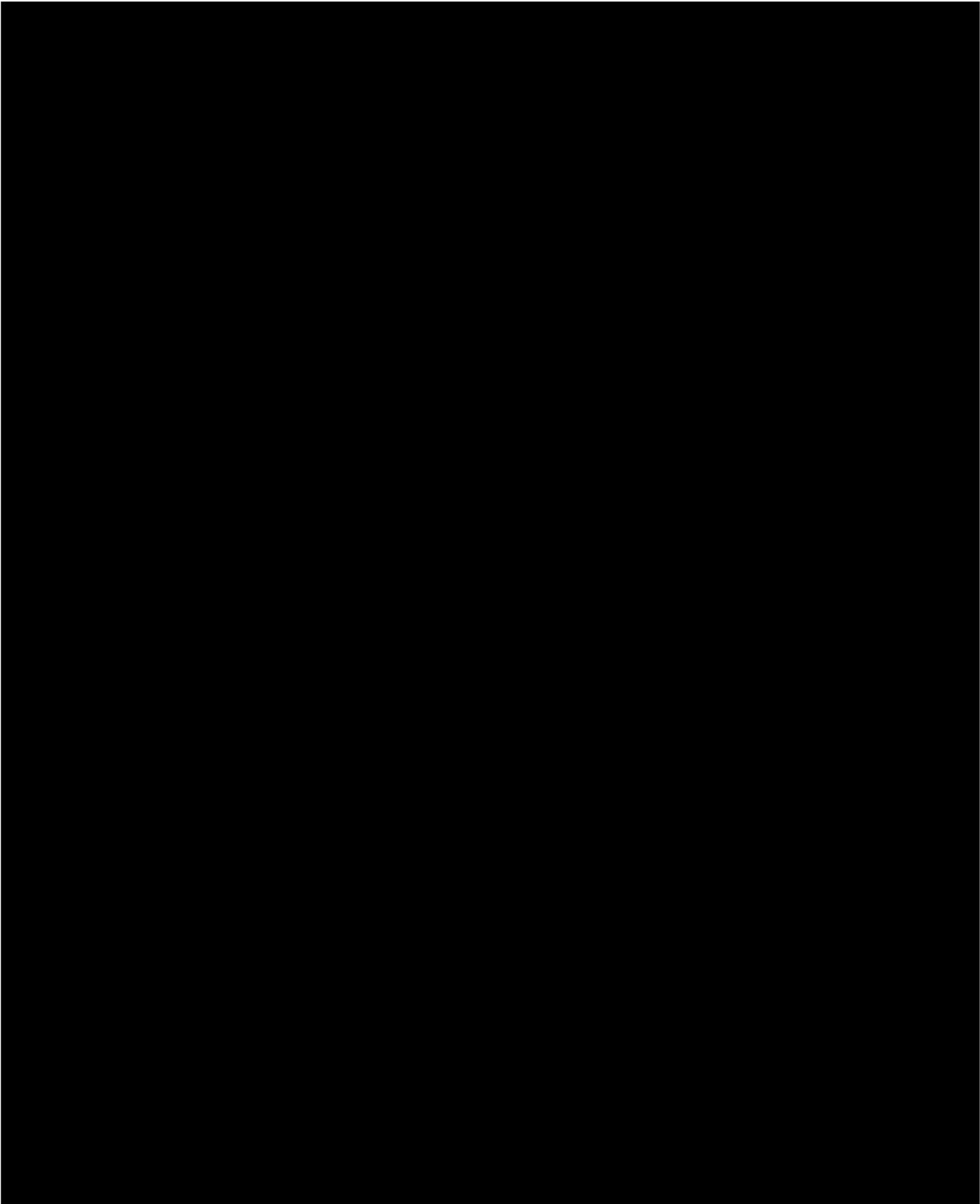
MGM Springfield reaffirms its commitment to Responsible Gaming as an existing Gaming licensee, and now into the new world of Sports Wagering. The attached plan includes all responsible practices currently in place at MGM Springfield for the conduct of gaming, and how they will translate to responsible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

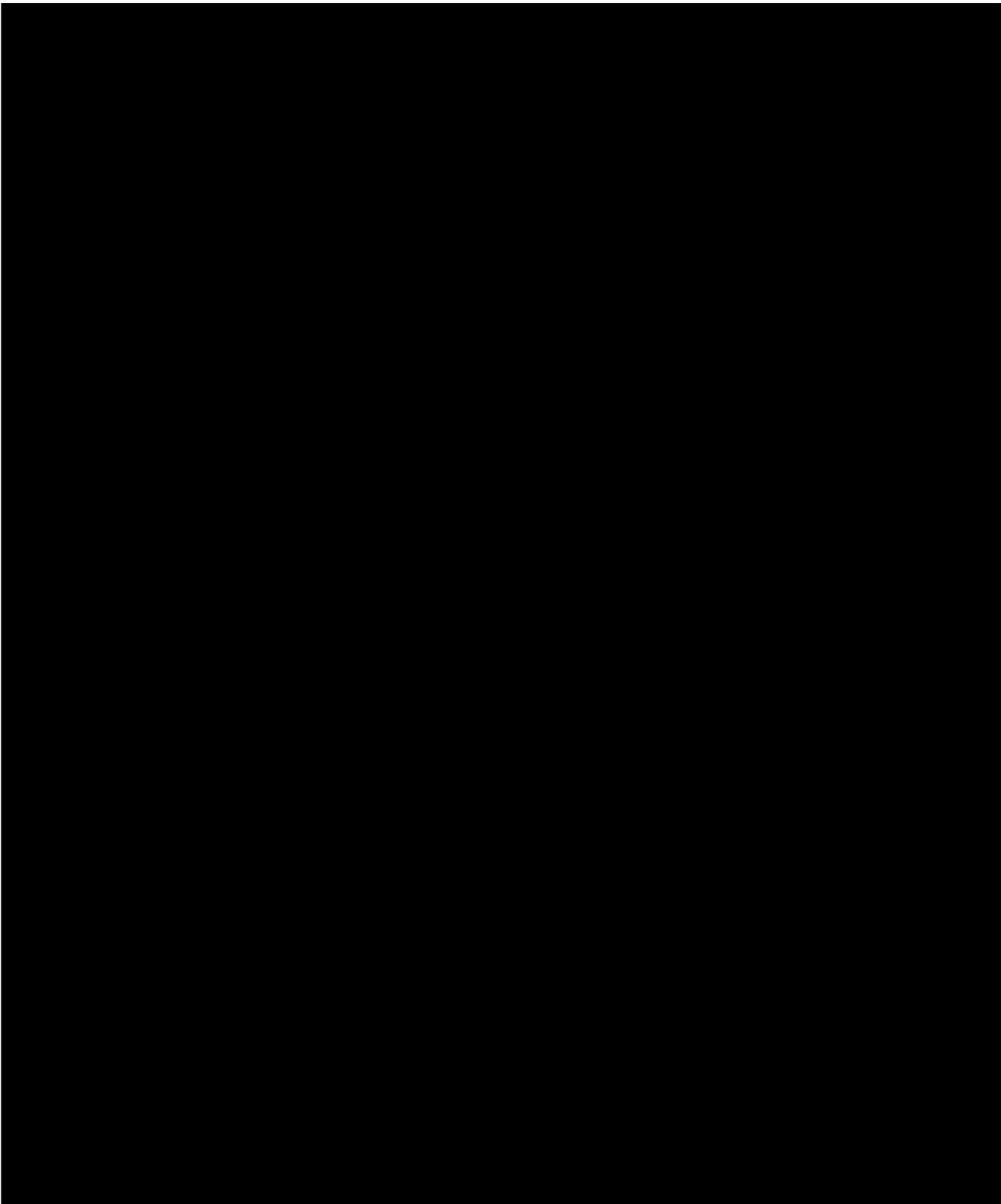
Please see MGM Springfield's Responsible Gaming Plan attached.

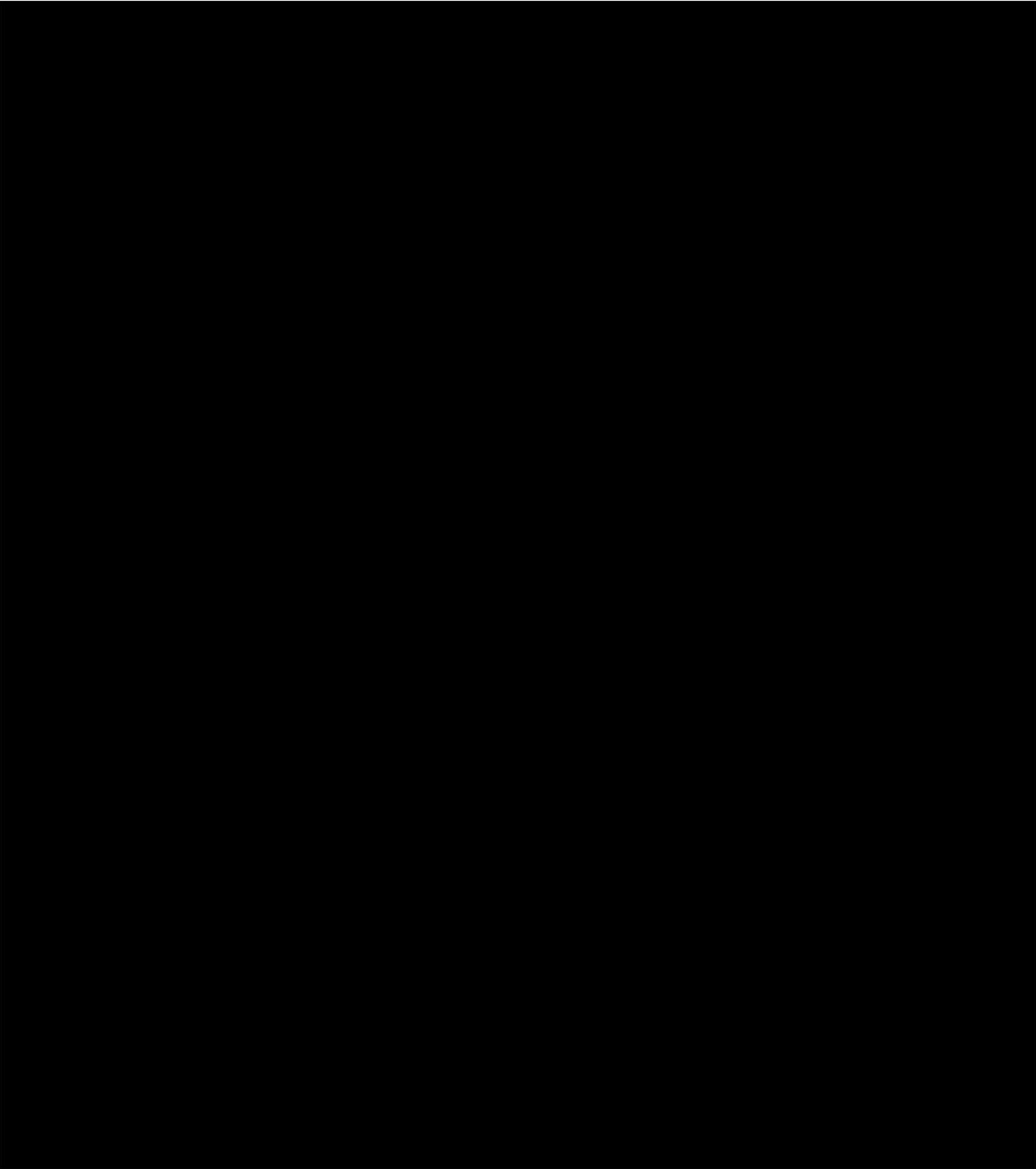


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Previously Submitted: _____







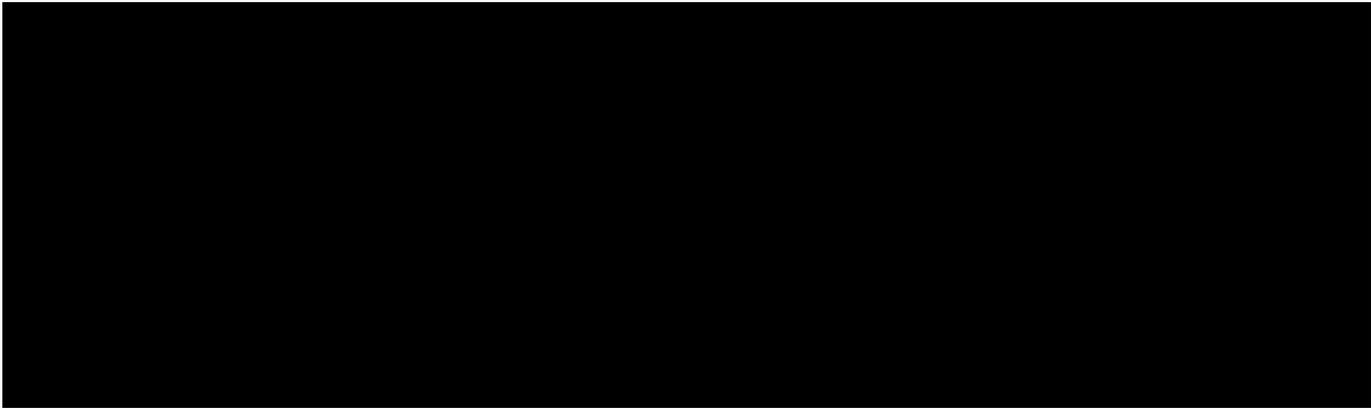


⁴ See MGM Resorts International’s Self-Limit Access Program and form: <https://www.mgmresorts.com/content/dam/MGM/mgm-grand/casino/forms/mgm-grand-casino-self-limit-patron-online-form.pdf>.

Revised: Aug 01, 2018
Previously Submitted: _____



Revised: Aug 01, 2018
Previously Submitted: _____



Revised: Aug 01, 2018
Previously Submitted: _____



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E.2 ADVERTISING & PROMOTIONAL PLANS

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

a. Estimated marketing budget in the Commonwealth

MGM Springfield does not have a separate and distinct Marketing Budget for Sports Wagering. Our sports betting partner, BetMGM submitted a separate application for licensure, where they detail their budget in this field. MGM Springfield incorporates by reference BetMGM’s budget for Marketing as we work together to bring this new style of wagering to the Commonwealth.



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E.1 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

MGM Springfield's current loyalty program, MGM Rewards, is already fully integrated with our Sports Wagering partner's system, so that MGM members receive a seamless interactive experience and can benefit from rewards across the different platforms.



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E.1 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***

As discussed above, MGM Springfield will not have a separate advertising plan solely for Sports Wagering, but will support and assist our partner through our current marketing and advertising channels, already in use as a Category 1 licensee.



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E.1 ADVERTISING & PROMOTIONAL PLANS

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

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

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



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E.1 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*

MGM Springfield plans to continue incentivizing adoption of our loyalty program through the brick and mortar casino and resort offerings we already provide, and elevate same with Sports Wagering as an additional amenity. Also, as mentioned above the interconnectivity with our partner's system makes this a great benefit of being a loyalty member with flawless end to end service across all gaming and non-gaming offerings. Patrons must be 21 years or older to signup and participate in our loyalty program.



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E.1 ADVERTISING & PROMOTIONAL PLANS

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

f. Plans to incorporate responsible gaming and problem gambling information

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



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E.1 ADVERTISING & PROMOTIONAL PLANS

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

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

MGM Springfield incorporates by reference BetMGM's application, specifically as it pertains to their marketing plan and converting users of illegal or unlicensed wagering entities.



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E.1 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**

By reference we point to our partner BetMGM's application submission, specifically their marketing plan document and their techniques as used in other jurisdictions.



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E.2 HISTORY OF DEMONSTRATED COMMITMENT

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

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

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



SECTION F: TECHNOLOGY

F.1 GEOFENCING

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

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

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

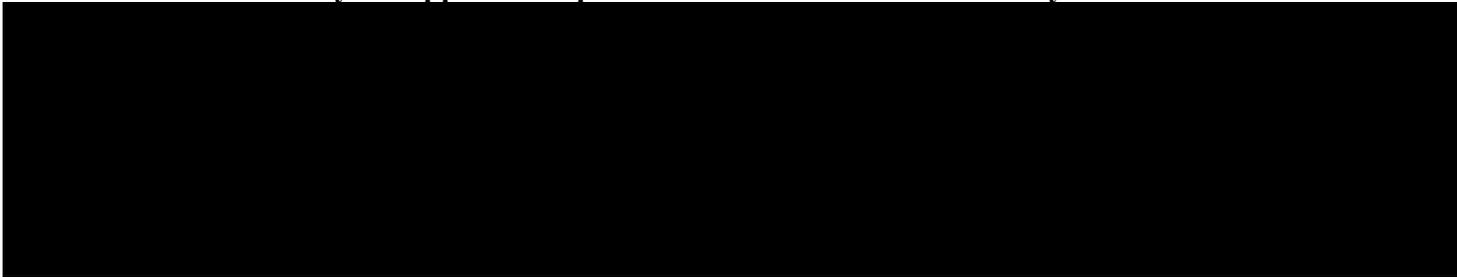


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F.2 **KNOW YOUR CUSTOMER**

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

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





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F.3 TECHNOLOGICAL EXPERTISE AND RELIABILITY

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

- a. Wager acceptance
- 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

MGM Springfield will only use sports wagering technology from our partner, BetMGM. Accordingly, MGM Springfield incorporates by reference BetMGM's separate application for licensure, specifically all documentation submitted under section F3.



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SECTION G: SUITABILITY

G.1 SUITABILITY – CORPORATE INTEGRITY

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

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

Please refer to the Business Entity Disclosure Form and related documents for Blue Tarp reDevelopment, LLC on file with the Massachusetts Gaming Commission.



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G.2 SUITABILITY - INDIVIDUAL QUALIFIER INTEGRITY

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

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

Please refer to the Multi-Jurisdictional Personal History Disclosure Forms and Massachusetts Gaming Commission Supplemental Forms on file with the Massachusetts Gaming Commission for Key Persons and Employees associated with Blue Tarp reDevelopment, LLC d/b/a MGM Springfield.



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G.3 FINANCIAL STABILITY & INTEGRITY

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

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

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



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G.3 FINANCIAL STABILITY & INTEGRITY

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

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

MGC is already aware that MGM Springfield spent \$4 million in 2021 to build a sports book that is currently being used as a sports entertainment and viewing lounge. Staff from IEB reviewed the area and made recommendations for improvement, with MGM Springfield completed. The plans have previously been submitted to MGC and approved. Also please see our response to C.3 for additional information.



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G.3 FINANCIAL STABILITY & INTEGRITY

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

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

Our sports betting partner, BetMGM submitted a separate application for licensure. MGM incorporates by reference BetMGM's analyses regarding plans and strategies regarding economic and financial factors.



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G.3 FINANCIAL STABILITY & INTEGRITY

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

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

As stated in in section G3.B. as a Category 1 licensee, MGM Springfield submits an Independent Audit Report and Material Weakness Statement subject to regulation 139.07(1).



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G.3 FINANCIAL STABILITY & INTEGRITY

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

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

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



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G.3 FINANCIAL STABILITY & INTEGRITY

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

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

MGM Springfield does not have any administrative or judicial proceedings involving a violation of a statute or regulation governing our operation. Please refer to the application of BetMGM, LLC for responses related to MGM Resorts International.



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G.3 FINANCIAL STABILITY & INTEGRITY

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

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

MGM Springfield has not filed for bankruptcy or had any proceeding commenced against it. Please refer to the application of BetMGM, LLC for responses related to MGM Resorts International.

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

Not applicable.



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G.3 FINANCIAL STABILITY & INTEGRITY

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

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

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



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G.4 COMPLIANCE

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

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

No current Key Persons at MGMS have been previously employed by the MGC. All Key Persons are currently and appropriately licensed through the MGC, based on their duties, roles and level within the organization. No Key Persons at MGMS have withdrawn, or been denied a gaming license in other jurisdictions. Nor have they had licenses suspended, revoked or non-renewed in any other jurisdiction. No Key Person have been found unsuitable for a gaming license in any other jurisdiction.