



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

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

APPLICANT INFORMATION & DESCRIPTION	
<b>Company Name:</b>	Sterling Suffolk Racecourse, LLC
<b>D/B/A or Trade Name(s):</b>	Suffolk Downs
<b>Corporate HQ Address:</b> <i>(Also include the address of any operation/s in Massachusetts)</i>	525 McClellan Highway East Boston, MA 02128
<b>Point-of-Contact for Licensing Process:</b> <i>(Include NAME, POSITION, ADDRESS, PHONE, EMAIL)</i>	Paul M. "Chip" Tuttle Chief Operating Officer Sterling Suffolk Racecourse, LLC 525 McClellan Highway East Boston, MA 02128 978-804-3361 ctuttle@ctpboston.com
<b>Description of Business:</b>	Massachusetts racing meeting licensee conducting simulcast and ADW wagering.
<b>Goods/Services you expect to provide in Massachusetts:</b>	Retail and mobile/digital sports wagering, simulcast and ADW wagering.

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



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<b>Applicant Tax Returns:</b>	<input checked="" type="checkbox"/> Stand-Alone <input type="checkbox"/> Consolidated ( <i>with</i> )
<b>Management Structure:</b> (Do you have any of the following?)	<input type="checkbox"/> Compliance Committee <input type="checkbox"/> Audit Committee <input type="checkbox"/> Compliance Plan <input type="checkbox"/> Other(s)

### ATTACHMENTS

#### PLEASE SUBMIT THE FOLLOWING INFORMATION

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

# CONFIDENTIAL

(Confidential Treatment Requested)

Sterling Suffolk Racecourse, LLC

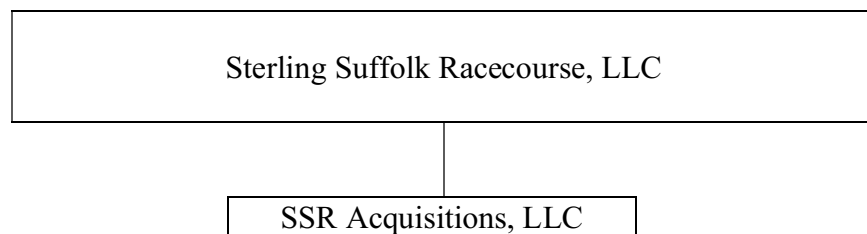
Scope of Licensing Initial Survey

## ATTACHMENT 1

### TABLE OF ORGANIZATION

Include parent companies and subsidiaries (note any companies that are publicly traded and are sports wagering-related).

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Sterling Suffolk Racecourse, LLC has no parent companies. It has one subsidiary, SSR Acquisitions, LLC, which is not an operating company and has no employees or assets. It was created in 2008 for potential real estate transaction that did not occur.

# **CONFIDENTIAL**

(Confidential Treatment Requested)

Sterling Suffolk Racecourse, LLC

Scope of Licensing Initial Survey

## ATTACHMENT 2

### **TABLE OF OWNERSHIP INTERESTS**

Show all ownership interests, including parent companies and subsidiaries showing the corporate structure with entity names and ownership percentages

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Please see attached.

### Sterling Suffolk Racecourse, LLC Table of Ownership Interests

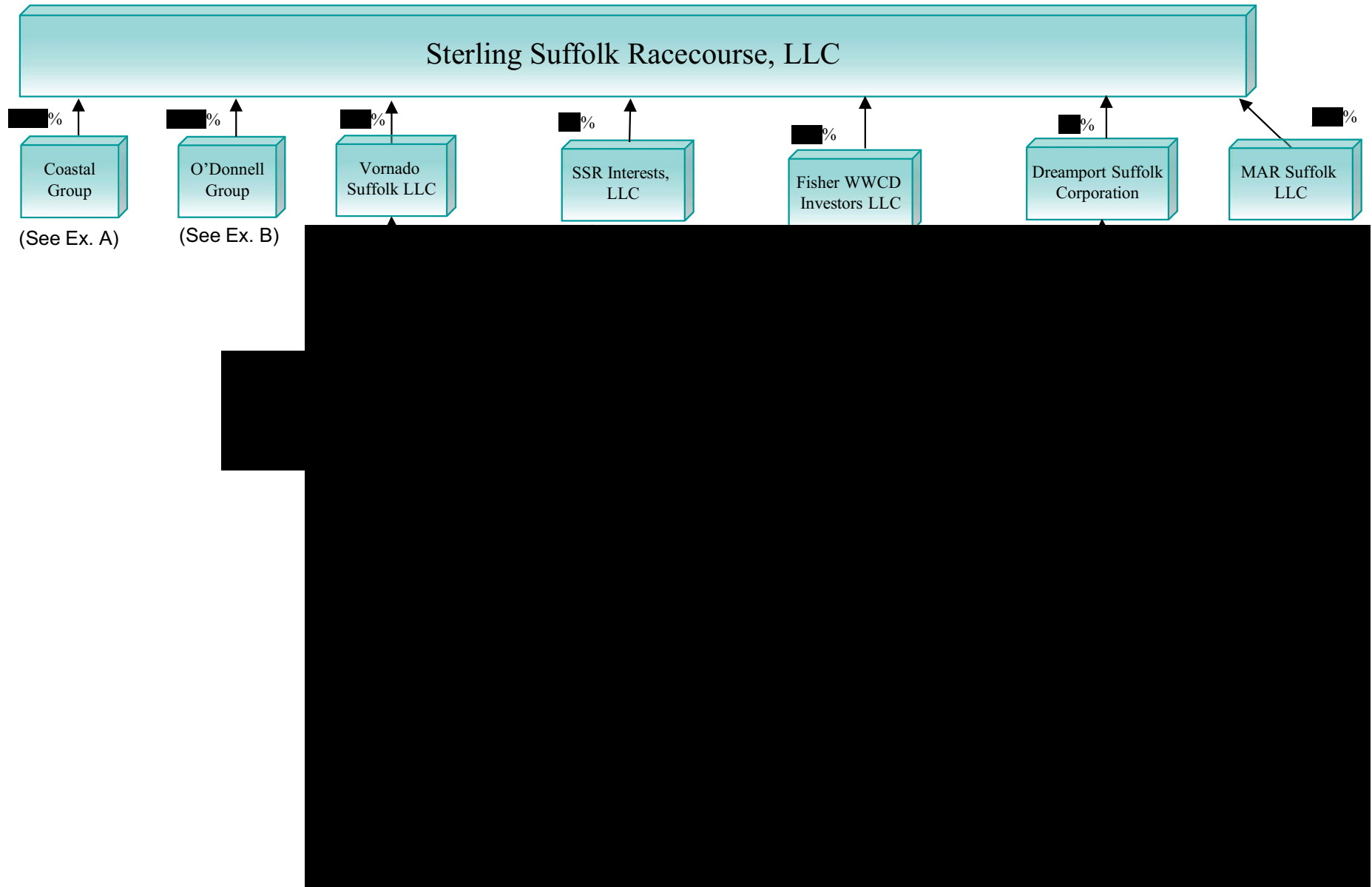
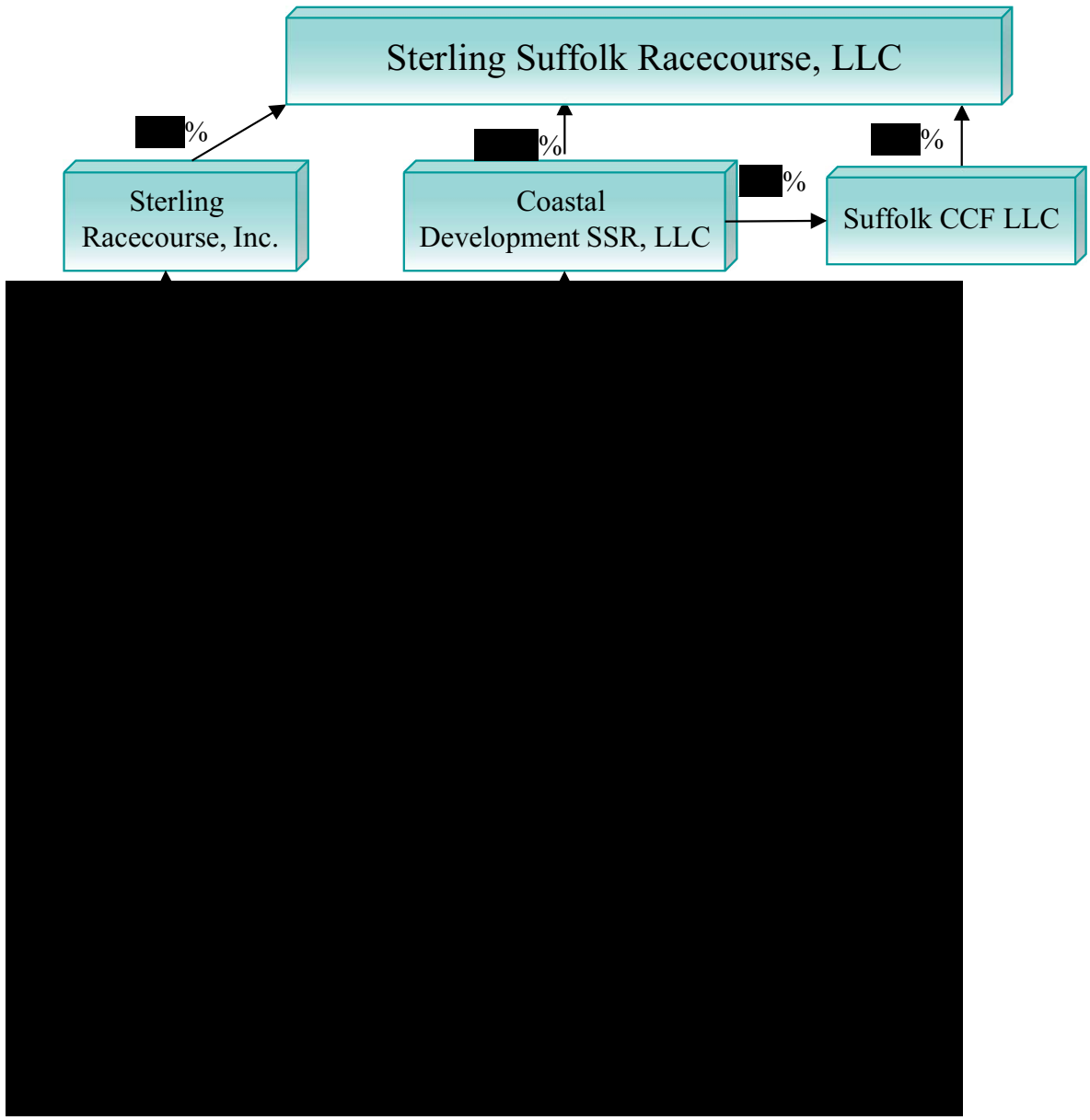


Exhibit A

**CONFIDENTIAL**

COASTAL GROUP OWNERSHIP

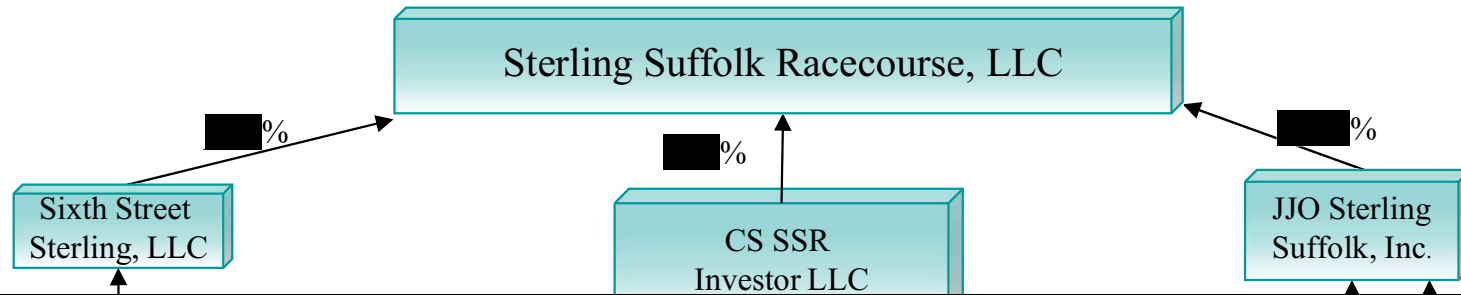


**CONFIDENTIAL**

Exhibit B

Attachment 2 (continued)

O'DONNELL GROUP OWNERSHIP



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(Confidential Treatment Requested)

Sterling Suffolk Racecourse, LLC

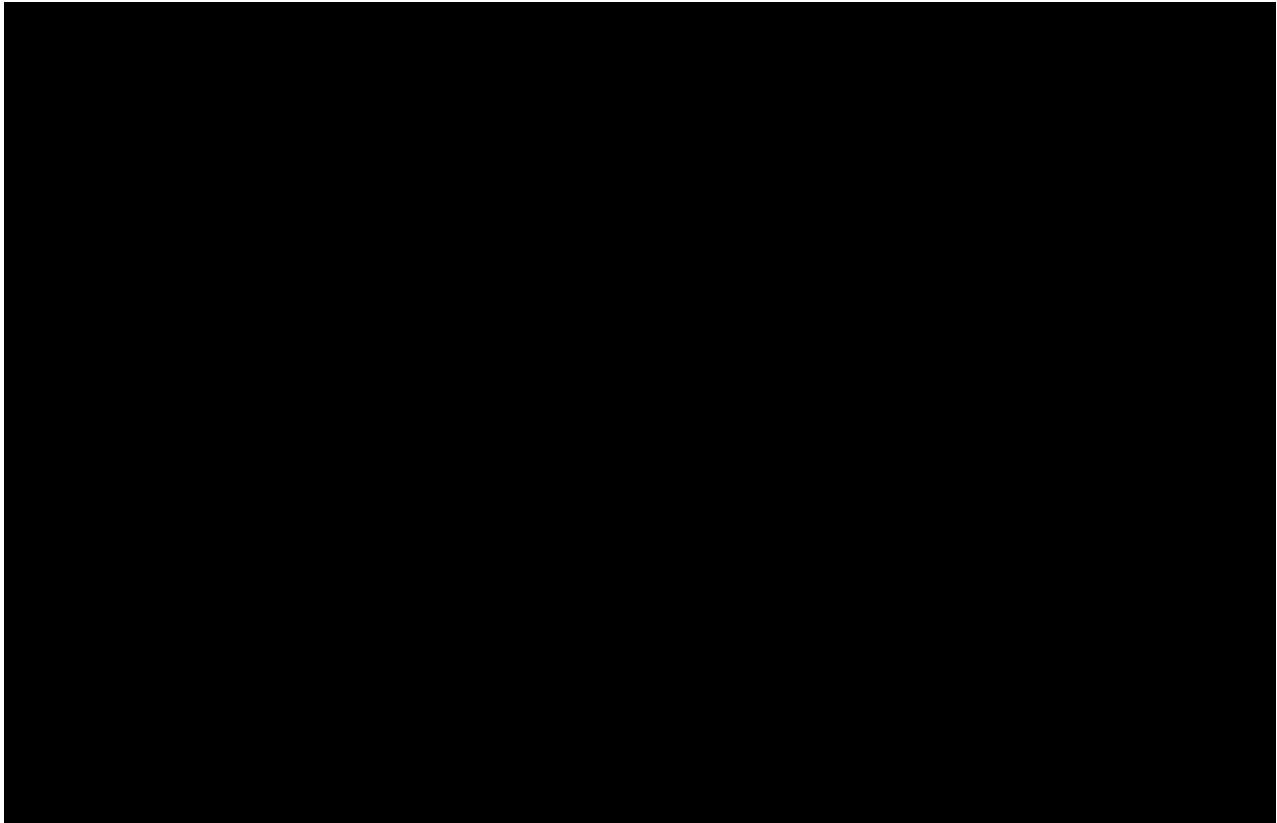
Scope of Licensing Initial Survey

ATTACHMENT 2 (continued)

**TABLE OF OWNERSHIP INTERESTS**

Show all ownership interests, including parent companies and subsidiaries showing the corporate structure with entity names and ownership percentages

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Sterling Suffolk Racecourse, LLC

Scope of Licensing Initial Survey

## ATTACHMENT 3

### **FUNCTIONAL TABLE OF ORGANIZATION**

Include the executive team and Board of Directors with individual names and titles, and percentage of ownership interest, if applicable.

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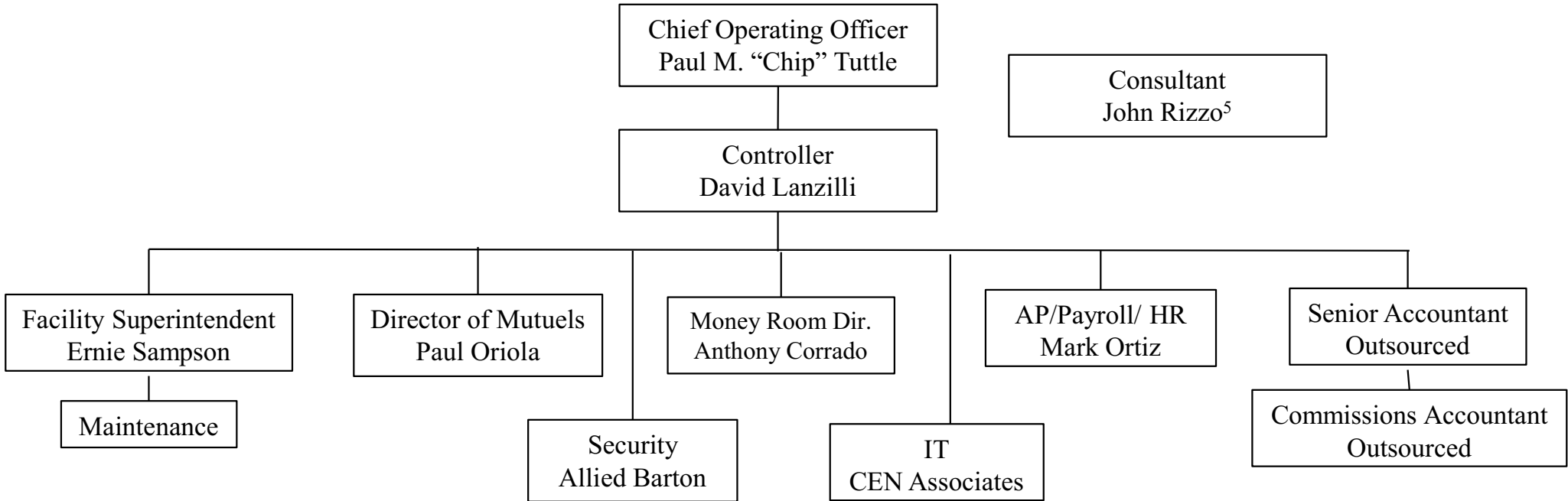
The attached function table of organization describes the existing business of Sterling Suffolk Racecourse, LLC (“SSR”), as a provider of simulcast and ADW wagering. As the Commission is aware, SSR is in the process of identifying one or more partners with or through whom it intends to conduct Category 2 and Category 3 sports wagering activities. When SSR identifies the partner(s), establishes the structure of the relationship(s), and identifies the further personnel who will be involved in the sports wagering business, SSR will supplement this disclosure as appropriate.

# Sterling Suffolk Racecourse, LLC Functional Table of Organization

## Board of Managers<sup>1</sup>



## Executive Team & Other Functions



### NOTES

1. SSR's operating agreement contemplates that the Board of Managers will be comprised of entities rather than individuals.
2. Appointed by [REDACTED]
3. Appointed by [REDACTED]
4. Appointed by [REDACTED]
5. Former Chief Financial Officer; currently serving a similar function as a consultant.

**CONFIDENTIAL**

(Confidential Treatment Requested)

Sterling Suffolk Racecourse, LLC

Scope of Licensing Initial Survey

ATTACHMENT 4

**CONTROL**

List (1) individuals and entities who own 10 percent or more of the applicant; (2) individuals and entities who have the ability to control the activities of the applicant; and (3) any executive, employee or agent having the power to exercise significant influence over decisions concerning the applicant’s sports wagering operations in Massachusetts.

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(1) As reflected in the Table of Ownership Interests (Attachment 2), the following entities own 10% or more of Sterling Suffolk Racecourse, LLC (“SSR”). There are no individuals who own 10% or more of SSR.

[REDACTED]

(2) [REDACTED]

(3) Chief Operating Officer Paul M. “Chip” Tuttle has the power to exercise significant influence over decisions concerning SSR’s sports wagering operations in Massachusetts. As the Commission is aware, SSR is in the process of identifying one or more partners with or through whom it intends to conduct Category 2 and Category 3 sports wagering activities. SSR expects that the partner(s) will provide and/or oversee additional personnel who will have significant influence over the operation of sports wagering activities. When SSR identifies the partner(s), establishes the structure of the relationship(s), and identifies the personnel who will be involved, SSR will supplement this disclosure as appropriate.

# **CONFIDENTIAL**

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Sterling Suffolk Racecourse, LLC

Scope of Licensing Initial Survey

## ATTACHMENT 5

### **INSTITUTIONAL INVESTORS**

Provide a list of these investors along with their percentage of ownership.

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Sterling Suffolk Racecourse, LLC (“SSR”) notes that MGL Chapter 23N and the Commission’s sports wagering regulations adopted to date do not set forth a definition of institutional investors. Applying the definition contained in MGL Chapter 23K, Section 2, SSR does not have any institutional investors.

ATTACHMENT 6

**LICENSING HISTORY**

List the last 3 jurisdictions in which licensed for sports wagering operations, including the type of license that was obtained.

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Sterling Suffolk Racecourse, LLC is a Massachusetts racing meeting licensee and a prospective Category 2 and Category 3 sports wagering licensee in Massachusetts. It has not been licensed for sports wagering operations in any other jurisdiction.

ATTACHMENT 7

**LICENSEE ASSOCIATION**

List any Gaming Licensee(s), Sports Wagering Operator Licensee(s) or Applicant(s) for a Sports Wagering Operator License with whom you have an agreement to conduct business or are in the process of negotiating an agreement.

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Sterling Suffolk Racecourse, LLC (“SSR”) does not have any agreements with a gaming licensee or a sports wagering operator licensee. SSR is in the process of identifying one or more partners with or through whom it intends to conduct Category 2 and Category 3 sports wagering activities. SSR will supplement this as appropriate as its process advances.