

IN THE PENNSYLVANIA GAMING CONTROL BOARD

IN RE: PETITION TO CONDUCT
SPORTS WAGERING AT SOUTH
PHILADELPHIA TURF CLUB

GREENWOOD GAMING AND
ENTERTAINMENT, INC D/B/A PARX
CASINO

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: PGCB DOCKET NO.: 8004-2018
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ORDER

AND NOW, this 3rd day of October, 2018, Greenwood Gaming and Entertainment, Inc d/b/a Parx Casino (“GGE”), having provided all required information in its *Petition for the Necessary Approvals and Authority to Conduct Sports Wagering at its South Philadelphia Turf Club* (“Petition”) and the Office of Enforcement Counsel having no objection, the Board hereby **GRANTS** GGE’s Petition, subject to the following conditions:

1. Prior to offering sports wagering to the public at the South Philadelphia Turf Club, Greenwood Gaming and Entertainment, Inc. (“GGE”) shall undergo a sports wagering test period at the nonprimary location as determined, scheduled and approved by the Board or its designee;
2. GGE shall not have its testing period at the South Philadelphia Turf Club or any other nonprimary location until such time that GGE has successfully completed a sports wagering test period conducted by the Board or its designee at its Category 1 Licensed Facility (Parx Casino) and has been issued a Sports Wagering Certificate by the Board;
3. This approval pertains only to the South Philadelphia Turf Club. Should GGE choose to offer sports wagering at any other nonprimary locations, GGE must request and receive approval from the Board;
4. Prior to the Board or its designee scheduling a test period for sports wagering at the South Philadelphia Turf Club, GGE shall obtain approval from the Board or its designee for any new, or modifications to its existing, shared services agreements between GGE and the

South Philadelphia Turf Club that may arise as a result of sports wagering operations at the South Philadelphia Turf Club;

5. Prior to the Board or its designee scheduling of the test period for sports wagering at the South Philadelphia Turf Club, GGE shall submit updated site plans which will identify and allow for the inspection and approval of areas of the facility designated for sports wagering.
6. Prior to the Board or its designee scheduling of the test period for sports wagering at the South Philadelphia Turf Club, GGE shall submit to and receive approval from the Board or its designee of its Compulsive and Problem Gambling Plan addressing sports wagering;
7. Prior to the Board or its designee scheduling of the test period for sports wagering at the South Philadelphia Turf Club, GGE shall receive approval from the Board or its designee of all internal and external security and surveillance measures at that facility;
8. Prior to the Board or its designee scheduling a test period for sports wagering at the South Philadelphia Turf Club, GGE shall ensure that all applications, as determined by the Board or its designee, for its sports wagering operator or any other entity or person associated with GGE's sports wagering operations at its primary and nonprimary locations are filed with the Board and that all necessary persons and entities are licensed or authorized by the Board;
9. Prior to the Board or its designee scheduling a testing period for sports wagering at the South Philadelphia Turf Club, GGE shall submit and receive approval from the Board or its designee of the sports wagering agreement between GGE and Kambi Group PLC ("Kambi");
10. Prior to the Board or its designee scheduling a testing period for sports wagering at the South Philadelphia Turf Club, GGE shall identify the estimated number of full-time and part-time employment positions, a brief description of the specific positions that will be created as a result of the conduct of sports wagering, and the physical address and area or department in which the positions will be physically located at GGE's facility and/or the South Philadelphia Turf Club facility;

11. Prior to the Board or its designee scheduling a testing period for sports wagering at the South Philadelphia Turf Club, GGE shall provide a photograph, if one is not on file with the Board, of each principal or key employee involved in GGE's sports wagering operations;
12. Prior to the Board or its designee scheduling a testing period for sports wagering at the South Philadelphia Turf Club, GGE shall identify the Minority Business Enterprise (MBE), Women Business Enterprise (WBE), and/or Local Business Enterprise (LBE) status of each of the known and proposed contractors and/or subcontractors that will be utilized by GGE and/or Kambi;
13. Prior to the Board or its designee scheduling a testing period for sports wagering at the South Philadelphia Turf Club, GGE shall submit to the Board an itemized list of the types of sports wagering, including the sporting events and types of sports wagers, GGE intends to offer;
14. Prior to the Board or its designee scheduling a testing period for sports wagering at the South Philadelphia Turf Club, GGE shall establish and allow for inspection by and receive approval from the Board or its designee any partition or demarcation, if any exists, which delineates and distinguishes its designated area where sports wagering may occur in relation to any non-gaming area;
15. Prior to the Board or its designee scheduling a testing period for sports wagering at the South Philadelphia Turf Club, GGE will allow for inspection by the Board or its designee, of all sports wagering equipment or devices and/or associated equipment or devices utilized by GGE and/or Kambi to conduct sports wagering in Pennsylvania;
16. Prior to the Board or its designee scheduling a testing period for sports wagering at the South Philadelphia Turf Club, GGE shall provide the Board with compliance certification from a testing laboratory acceptable to the Board, which shall identify GGE's proposed sports wagering devices and/or equipment and any associated equipment and/or devices, including but not limited to sports wagering software or hardware, to ensure that the aforementioned function properly, are accurate and are in compliance with Chapter 13C

of Act and the requirements of the Board's regulations. Conversely, this certification can also be performed by the Board's Gaming Laboratory.

17. Prior to the Board or its designee scheduling a testing period for sports wagering at the South Philadelphia Turf Club, GGE shall submit to the Board or its designee for approval, any and all internal controls relating to all aspects of sports wagering. Internal controls must be approved prior to implementation, including at any time thereafter in which a change is contemplated to the approved internal controls. The internal controls must include detailed procedures for security, surveillance, operations, accounting, and compliance with the Pennsylvania Clean Indoor Air Act (35 P.S. §§ 637.1-637.11);
18. Prior to the Board or its designee scheduling a testing period for sports wagering at the South Philadelphia Turf Club, GGE shall submit to the Board or its designee for approval, accounting systems for sports wagering accounts and per wager charges, if any. Such systems must provide transparency in reporting to the Board and the Department of Revenue for the purpose of auditing and internal control compliance reviews;
19. Prior to commencing sports wagering, in accordance with Section 1408.3 of the Board's regulations, Kambi shall submit to the Board or its designee for approval, internal controls for all aspects of sports wagering. Internal controls must be approved prior to implementation and any time a change is made thereafter; and
20. For the issuance and continued validity of a sports wagering certificate, GGE shall collect, report, and pay all applicable taxes and fees and shall maintain all books, records, and documents pertaining to GGE's sports wagering operations in a manner and location within this Commonwealth as approved by the Board. All books, records, and documents shall be immediately available for inspection by the Board and the Department of Revenue during all hours of operation in accordance with the regulations of the Board and shall be maintained in a manner and during periods of time as the Board shall require;
21. Pursuant to 4 Pa.C.S. §13C25, the sports wagering area of the South Philadelphia Turf Club must be at least 50% non-smoking. The sports wagering area of the South

Philadelphia Turf Club is separate and independent from all other GGE sports wagering areas.

Further, it is hereby **ORDERED** that GGE's *Motion to Protect Confidential Information* is hereby **GRANTED**.

By the Board:

A handwritten signature in black ink, appearing to read "David M. Barasch", written over a horizontal line.

**David M. Barasch, Chairman
Pennsylvania Gaming Control Board**