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March 13, 2024

VIA ELECTRONIC MAIL TO:

BOARDCLERK@PA.GOV

Lyndsey Wanich, Board Clerk

PENNSYLVANIA GAMING CONTROL BOARD

Hearings and Appeals Office

303 Walnut Street

2nd Floor, Strawberry Square

Harrisburg, Pennsylvania 17101

**Re: In the Matter of the Petition of Catena Operations Ltd. for
Surrender of Michael Daly's License Pursuant to 58 Pa. Code § 423a.5**

Dear Ms. Wanich:

This firm represents Petitioner, Catena Operations Ltd. Attached for filing please find a Petition of Catena Operations Ltd. for Surrender of Michael Daly's License Pursuant to 58 Pa. Code § 423a.5. Thank you for your assistance.

Respectfully Submitted,



STEPHEN D. SCHRIER

SDS:dk

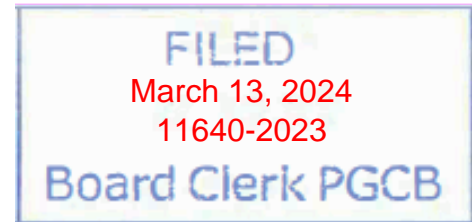
Enclosure

cc: Cyrus Pitre, Chief Enforcement Counsel
Lauren O'Donnell, Esquire

(Via Email: cpitre@pa.gov)
(Via Email: lauren.odonnell@blankrome.com)

**BEFORE THE
PENNSYLVANIA GAMING CONTROL BOARD**

In the Matter of the Petition of : Docket No.
Catena Operations Ltd. for Surrender :
of Certain Licenses :
Pursuant to 58 Pa. Code § 423a.5 :
:



**PETITION OF CATENA OPERATIONS LTD. FOR SURRENDER
OF MICHAEL DALY’S PRINCIPAL LICENSE PURSUANT TO 58 Pa. CODE § 423a.5**

Petitioner Catena Operations Ltd. (“Catena”), by and through its undersigned counsel, hereby respectfully submits this Petition for Surrender of Michael Daly’s Principal License, Gaming Identification Number 110102-1, pursuant to 58 Pa. Code § 423a.5. In support thereof, Petitioner avers as follows:

1. Catena initially filed an application as an Interactive Gaming Service Provider, Certified, with the Pennsylvania Gaming Control Board (“Board”), Gaming Identification Number 109711-1.
2. Consequently, principals and key employees of Catena were required to file applications with the Board.
3. As part of Catena’s application, personal history disclosure forms were filed for Michael Daly, who was Catena’s Chief Executive Officer, Gaming Identification Number 110102-1.
4. Since submitting his application, Michael Daly has left the employ of Catena, and therefore is no longer required to be licensed or approved by the Board.
5. Given Michael Daly’s departure, Pierre Cadena VP Corporate Strategy, will assume the role of interim CEO.
6. Manuel Stan has been named CEO. He is expected to start work on July 1, 2024, at which time Pierre Cadena will revert back to VP Corporate Strategy.

7. To the best of Petitioner's knowledge, the surrender of the license application noted in this Petition is not due to any issue related to any activity outlined in 58 Pa. Code § 421a.2(b).

8. Consequently, good cause exists for the surrender of the licensing application of Michael Daly, without prejudice.

9. Petitioner's request for surrender of the application of Michael Daly is appropriate and should be granted, as he is no longer employed by Catena.

10. Accordingly, Petitioner respectfully requests that the Board grant this Petition for Surrender of this license applicants pursuant to 58 Pa. Code § 423a.5.

WHEREFORE, for the foregoing reasons, Petitioner, Catena respectfully requests that the Board enter an Order providing the following:

- A. Granting the Petition for surrender pursuant to 58 Pa. Code § 423a.5, and entering an Order providing for surrender of the license application of Michael Daly, formerly of Catena, without prejudice; and,
- B. Providing for such other relief that the Board deems appropriate.

Respectfully submitted,

BLANK ROME LLP



By:

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Dated: March 13, 2024

Attorneys for Petitioner, Catena Operations Ltd.

VERIFICATION

I, Stephen D. Schrier, Esq. hereby state that the facts set forth above are true and correct to the best of my knowledge, information and belief. I understand that the statements herein are made subject to the penalties of 18 Pa. C.S. § 4904 (relating to unsworn falsification to authorities).

A handwritten signature in black ink, appearing to be 'SDS' followed by a long horizontal stroke.

Date: March 13, 2024

STEPHEN D. SCHRIER, ESQUIRE
Attorney for Petitioner Catena Operations
Ltd.

CERTIFICATE OF SERVICE

The undersigned counsel for Catena Operations Ltd. hereby certifies that a true and correct copy of this petition was served on this date via email and Fed Ex addressed to the following:

Lyndsey Wanich, Board Clerk
Pennsylvania Gaming Control Board
Hearings and Appeals Office
303 Walnut Street, Strawberry Square
Commonwealth Tower, 10th Floor
Harrisburg, PA 17101

BLANK ROME LLP



By: _____

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Dated: March 13, 2024

Attorneys for Petitioners, Catena Operations Ltd.