

COMMONWEALTH OF PENNSYLVANIA

GAMING CONTROL BOARD

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IN RE: GREENWOOD GAMING & ENTERTAINMENT, INC. -  
PETITION FOR AN INTERACTIVE GAMING CERTIFICATE

\* \* \* \* \*

HEARING

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BEFORE: DAVID M. BARASCH, Chairman  
Richard G. Jewell, Obra S. Kernodle, IV,  
Sean Logan, Kathy M. Manderino,  
Merritt C. Reitzel, Dante Santoni, Jr.,  
Members  
Jorge M. Augusto, representing Russell  
Redding, Secretary, Department of  
Agriculture; Jennifer Langan, representing  
Joseph M. Torsella, State Treasurer; Radee  
Skipworth representing Secretary of  
Revenue, C. Daniel Hassell

HEARING: Wednesday, August 15, 2018  
11:07 a.m.

Reporter: Rhonda K. Thorpe

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LOCATION: Strawberry Square, 2nd Floor  
Harrisburg, PA 17106

WITNESSES: None

## A P P E A R A N C E S

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3 OFFICE OF ENFORCEMENT COUNSEL

4 ASHLEY GABRIELLE, ESQUIRE

5 Assistant Enforcement Counsel

6 PA Gaming Control Board

7 P.O. Box 69060

8 Harrisburg, PA 17106-9060

9 Counsel for the Pennsylvania Gaming Control Board

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11 MARK S. STEWART, ESQUIRE

12 Eckert Seamans

13 213 Market Street

14 8th Floor

15 Harrisburg, PA 17101

16 Counsel for Greenwood Gaming Entertainment

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18 ALSO PRESENT:

19 MATTHEW CULLEN, Senior VP of Interactive Gaming &amp;

20 Sports

21 JOHN DIXON, Chief Technology Officer

22 TOM BONNER, ESQUIRE, Greenwood Legal

23 BRIAN SCHROEDER, ESQUIRE VP of Regulatory Affairs,

24 Chief Compliance Officer

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PRESENTATION

By Attorney Stewart

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PRESENTATION

By Mr. Cullen

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DISCUSSION AMONG PARTIES

9 - 11

## P R O C E E D I N G S

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CHAIRMAN: Next we have Greenwood Gaming & Entertainment, Inc. May I request whoever's going to speak state and spell your name for the court reporter, and non-attorneys at this point stand to be sworn.

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WITNESSES SWORN EN MASSE

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ATTORNEY STEWART: May it please the Court, good morning. My name is Mark Stewart and I'm - S-T-E-W-A-R-T - with the Law Firm of Eckert Seamans.

And I am here today on behalf of the Greenwood Gaming Entertainment on its petition for an Interactive Gaming Certificate.

With me is Matthew Cullen, C-U-L-L-E-N, the Senior Vice President of Interactive Gaming & Sports, as well as John Dixon, D-I-X-O-N, the Chief Technology Officer for Greenwood Gaming & Entertainment.

Also with us today is Tom Bonner, the Greenwood Legal and Chief Counsel, whom you know well, and as well as Brian Schroeder the Vice President of Regulatory Affairs and Chief Compliance Officer.

1                   On July 12th of 2018 Greenwood Gaming  
2 & Entertainment filed its petition with the Board  
3 seeking three Certificates to conduct all of the  
4 allowable types of interactive gaming.

5                   We received an Answer from the OEC,  
6 which thankfully had no objection, but did include  
7 some 19 additions, to which we have no objection.

8                   We have a brief presentation for you  
9 today, which will be led by Mr. Cullen. And we will  
10 be touching on interactive gaming plans and the public  
11 protection measures that Greenwood has - intends to  
12 have in place. Mr. Cullen?

13                   MR. CULLEN: Thank you. Thank you for  
14 this opportunity to come before you this morning. My  
15 name is Matthew Cullen, C-U-L-L-E-N.

16                   By way of introduction, just to talk a  
17 little bit about our strategy for interactive gaming  
18 within Pennsylvania. It's a very simple and focused  
19 and straightforward strategy. We aim to replicate  
20 exactly what we do at the casino today from a  
21 land-based gaming offering perspective by bringing  
22 those games to the web and mobile devices to patrons  
23 within the borders of Pennsylvania, current customers  
24 as well as new customers.

25                   A little bit about me. I've held

1 various roles throughout the last decade and  
2 interactive leadership and operational  
3 responsibilities with various gaming companies. Ran  
4 business development and strategy for Paddy Power  
5 Betfair, and most recently was the CEO of the  
6 interactive business units of the largest casino in  
7 California, the San Manuel Tribe, outside of Los  
8 Angeles.

9                   Our platform provider, we selected  
10 several years ago GAN, PLC, which is formally known as  
11 Game Account Network, PLC, based out of London. We've  
12 been running the actual platform itself for the last  
13 four years, offering our players simulated gaming  
14 opportunities.

15                   GAN is currently licensed in the State  
16 of New Jersey through the New Jersey Division of  
17 Gaming Enforcement. And they have been in operation -  
18 operational in the state since the first day of  
19 internet gaming in November of 2013.

20                   Currently today they have two  
21 customers within New Jersey, Paddy Power Betfair, and  
22 most recently, Ocean Resort. I personally have  
23 operated the - on the GAN platform as well, for the  
24 last four years in the State of California, when  
25 working for San Manuel.

1                   Parx products on the next slide will  
2 be clearly distinguished as Parx Casino branded  
3 products. We aim to offer cross platform offerings  
4 through a website, as well as mobile apps available on  
5 iOS on Apple and Android through the - through Google.

6                   GAN, again, our platform provider is a  
7 leading B2B supplier of internet gaming software based  
8 in London. They're listed on not only the Irish Stock  
9 Exchange, but also the London Stock Exchange, under  
10 the symbol, G-A-N.

11                   And they license their platform  
12 technology to land-based casino operators, both in  
13 Europe and the United States. As far as content is  
14 concerned, sticking with our strategy, we expect to  
15 offer a wide range of games specifically focused on  
16 slots, table games and poker.

17                   As it relates to age verification,  
18 GAN, our platform provider, have integrated industry  
19 leading third-party solutions, which include Aristotle  
20 and Idology. They currently deploy these third-party  
21 solutions and are - are up and running across the  
22 State of New Jersey through those partnerships with -  
23 with Betfair and Ocean Resort.

24                   The know your customer process, or better  
25 known as KYC in the industry, ensures that all

1 age-appropriate patrons are able to play the games by  
2 - by logging into these industry solutions to verify  
3 who those players are and where they reside.

4                   For geolocation, GAN has integrated a  
5 third-party service called Geocomply, very leading  
6 geolocation provider. They've been licensed in New  
7 Jersey as well, since the launch of internet gaming.

8                   This technology ensures that patrons  
9 must be physically located inside the geographic  
10 boundaries of the state, and in this case  
11 Pennsylvania. The - this service allows the GAN  
12 platform to locate a patron. And ensures that there  
13 is no falsification of that location. They are in the  
14 - in the borders of the state.

15                   As it relates to patron account  
16 security, GAN has deployed a series of security  
17 policies. Their system infrastructure is protected  
18 with DDOS Protection Services. All data within the  
19 database is encrypted and data in transit across the  
20 public networks is secured in line with all PCI  
21 requirements.

22                   ATTORNEY STEWART: Mr. Chairman,  
23 that's our presentation. Consistent with the last  
24 speakers, we would like to move our presentation into  
25 evidence at the appropriate time.

1                   CHAIRMAN:    So moved.

2                   ATTORNEY STEWART:   And would seek the  
3 granting of our motion of confidentiality.

4                   CHAIRMAN:    Okay.

5                   So moved.

6                   Questions or comments from the OEC?

7                   ATTORNEY GABRIELLE:   Yes, Mr.

8 Chairman.   Thank you.   Good morning.

9                   Good morning members of the Board.   My  
10 name is Ashley Gabrielle, G-A-B-R-I-E-L-L-E, with the  
11 OEC.   The OEC does not have any questions in this  
12 matter and does not have a presentation.

13                   However, we would request permission  
14 to make a statement and recommendation prior to  
15 opening the matter to questions from the Board and  
16 ex-officio members.

17                   CHAIRMAN:    Proceed.

18                   ATTORNEY GABRIELLE:   Thank you.   The  
19 OEC, along with the Bureau of Gaming Operations, BIE,  
20 Bureau of Gaming - Gaming Laboratory Operations,  
21 Bureau of Licensing, Office of Diversity and the  
22 Office of Compulsive and Problem Gambling have  
23 reviewed and consulted extensively the petition, and  
24 appendices, by Greenwood Gaming & Entertainment to  
25 conduct interactive gaming.   And for the issuance of

1 an Interactive Gaming Certificate. After which OEC  
2 filed an Answer in this matter requesting that the  
3 Board order the implementation of certain listed  
4 conditions, if it was so inclined to grant Greenwood's  
5 Petition.

6 As a result the OEC has no objection  
7 to the approval of Greenwood Gaming & Entertainment's  
8 Petition to conduct interactive gaming, and to the  
9 issuance of an Interactive Gaming Certificate to  
10 Greenwood Gaming & Entertainment, subject to the  
11 proposed conditions outlined in OEC's Answer filed on  
12 August 2nd, 2018, and any other conditions imposed by  
13 the Board.

14 OEC is available for any questions you  
15 may have.

16 CHAIRMAN: Thank you. Questions from  
17 the Board? Questions or comments of any -?

18 Hearing none, thank you all for  
19 appearing today. This matter will also be taken up -.

20 ATTORNEY STEWART: Thank you members  
21 of the Board. And thank you also the staff.

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23 HEARING CONCLUDED AT 11:15 A.M.

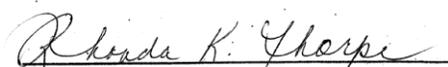
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## CERTIFICATE

I hereby certify that the foregoing proceedings, held before Chairman Barasch, was reported by me on 08-15-18 and that I, Rhonda K. Thorpe, read this transcript, and that I attest that this transcript is a true and accurate record of the proceeding.

Dated the 12th day of September, 2018



**Court Reporter**

Rhonda K. Thorpe