



TENNESSEE SPORTS GAMING OPERATOR SUPPLEMENTAL FORM



Sports Gaming Operator Supplemental Form

This Tennessee Sports Wagering Council ("SWC") Sports Gaming Operator Supplemental Form is in addition to any personal or business disclosure form and applies only to those seeking a License as a Sports Gaming Operator.

Every question must be answered completely, accurately, and legibly. Only respond to a question with "Unknown" if substantial effort is made to obtain the response. If the response space to a question is insufficient or if additional details are necessary to adequately respond to the question, attach an additional page that clearly references the question being answered.

Once an applicant submits a complete application, it cannot be withdrawn without approval of the SWC.

Applications are confidential pursuant to Tennessee law, except as necessary in the administration of the Sports Gaming Act or policies, rules, or regulations promulgated thereunder by the SWC or pursuant to a lawful court order. Nevertheless, an applicant or licensee waives any liability of the State of Tennessee, the SWC, or any representatives, agents, or employees thereof for any damages resulting from the disclosure or publication in any matter, except if made willfully and unlawfully. Any application form, document, or information provided to the SWC as part of the application remains the property of the SWC and will not be returned to the applicant.

Upon submitting this form, you certify that you have responded truthfully and have not made **ANY MISREPRESENTATION, MISLEADING STATEMENT, OR OMISSION, OR FAILED TO STATE A MATERIAL FACT** in this form or any other form, document, or submission of information that is part of the application. Such action may be cause for denial of the application or grounds for disciplinary action upon discovery that such action was taken during the application process.



Provide the name and contact information of any third party attorney, accountant, auditor, compliance specialist, or other person or organization who assisted with completion of this form or any part of the applicant's application.

Name and Title

Primary Phone Number

Primary E-Mail Address

III. BUSINESS STRUCTURE

1. Provide an organizational chart reflecting individuals who have the power to exercise significant influence over sports wagering in Tennessee, whether or not physically located in Tennessee, and who are associated with the Applicant as (a) a principal owner of more than 5% of the Applicant; (b) a partner of the Applicant, voting member on the board of directors of the Applicant, or an officer of the Applicant; or (c) an employee of the Applicant who principally oversees wagering activity, risk management, platform management, or integrity monitoring. Include a job description for each of those individuals.

2. Will the applicant have any physical location presence in the State of Tennessee?

☐ Yes, Provide Attachment

☐ No

If the answer is "Yes," provide a summary of each physical location, purpose and nature of location presence, and the number of key personnel, employees, contractors, or other agents or representatives stationed at the location.

Provide copies of any agreements or contracts as part of any partnership, joint venture, or arrangement to occupy any space or portion of premises for the purposes of sports gaming operations.

3. Types of wagers you propose to offer as a Sports Gaming Operator. Check all boxes that apply.

☐ Spread Betting ☐ Fixed-Odds Betting ☐ Pari-Mutuel Betting ☐ Parlay Betting

☐ Money Line Betting ☐ Proposition Betting ☐ Future Betting ☐ Live Betting

☐ Pool Betting

Other: _____

Other: _____



4. Will the applicant accept or place layoff wagers in accordance with the State of Tennessee and federal law?

☐ Yes, Provide Attachment

☐ No

If the answer is "Yes," provide a summary of plans to accept or place layoff wagers, agreements with sports gaming operators in Tennessee to accept or place layoff wagers, and mechanisms to ensure that layoff wagers remain intrastate to comport with federal law.

5. Provide a customer service phone number and e-mail address for responding to public and patron inquiries and questions originating from the State of Tennessee or relating to sports gaming operations in the State of Tennessee.
6. Provide a copy of the notice supplied to customers about restrictions on wagers. Identify any restrictions on wagers that are in addition to any restrictions or prohibitions provided by the laws or regulations of the State of Tennessee.
7. Provide a summary of the risk management, odds making, and line monitoring and setting processes and procedures for the applicant, including the use and extent of global risk management. Include a list of Key Personnel, employees, contractors, or other agents or representatives assigned to manage risk, create odds, and set lines for sports gaming in the State of Tennessee.
- Include the name, location where such activity occurs, title and job description, and whether the person has authority to adjust lines.
 - Include how opening lines are established and what sources are used to establish opening lines.
 - Provide copies of any agreements or contracts with any third party, independent contractor, vendor, consultant, or other provider for risk management, odds making, line setting, or sports gaming information services, including any services for real-time line movement and wagering updates or feeds.
8. Provide a copy of the applicant's House Rules for sports gaming in the State of Tennessee and identify how customers can access and view the House Rules.
9. Provide a copy of the applicant's Terms and Conditions.
10. Provide policies, procedures, and mechanisms for resolving patron disputes, including, but not limited to, disputes involving wagers, lines or odds, information assisting in placement of wagers, access to customer funds, and complimentary, bonuses, free play, refunds or discounts, rebates, other promotions, or account takeovers.



11. Regarding any sports gaming account for customers in the State of Tennessee, provide the following:
 - (a) Minimum deposit required to establish an account
 - (b) Summary of procedures for establishing an account
 - (c) Policies, procedures, or mechanisms for ensuring wagers are made in the State of Tennessee from accounts that are commingled with accounts in other jurisdictions where sports gaming is legal (e.g., shared wallet)
 - (d) Procedures, processes, and mechanisms to prevent wagers from accounts being established and wagers being made by Minors
 - (e) Methods for performing identification verification, due diligence, and know-your-customer reviews for accounts and transactions
 - (f) Customer privacy and security policies
 - (g) Procedures and processes for depositing funds, including the types or forms of funds accepted
 - (h) Procedures and processes for withdrawing funds, including the types or forms of payments allowed and anticipated time between request to withdraw and receipt of funds by customer
 - (i) Procedures and processes for closing an account, including how any funds balance will be disbursed or returned to the customer and anticipated time between request or notice to close account and receipt of funds by customer.
12. Provide a copy and summary of any policies, procedures, and mechanisms for ensuring integrity in sports gaming in the State of Tennessee and any jurisdiction where the applicant operates. Including, but not limited to:
 - a. Use of an Integrity Monitoring Provider in accordance with Rule 1350-01-.03(10);
 - b. Information sharing channels; and
 - c. Communication channels to the SWC and any jurisdiction where the applicant operates sports gaming.



13. Provide a copy of the applicant's certificate of good standing and authorization to conduct business in the State of Tennessee.

IV. FINANCIAL INFORMATION

14. Provide an estimate of the privilege tax revenue to be generated by the Applicant for the first three (3) years of operation in the State of Tennessee.
15. Provide any research, analysis, reports, data, or other information with projections on the amount of annualized gross revenue; estimated new capital investment; and scientific or market research performed by the Applicant or its contractors to show the economic benefit to the State of Tennessee the Applicant will provide.
16. Provide a copy of the Bond required by SWC Rule 1350-01-.07(1)(a).
17. Supply the name and address of the bank, credit union, or other financial institution that will hold the cash, bond, or other source of reserve required pursuant to the Tennessee Sports Gaming Act and regulations promulgated thereunder.
 - (a) Provide copies of the proposed reserve agreement to be entered into and name, telephone number, and principal contact at the bank, credit, or other financial institution.
18. Provide the name and address of the independent accountant responsible for any external audit services relating to sports gaming operations in the State of Tennessee.
19. Provide a current copy of all insurance certificates in accordance with SWC Rule 1350-01-.07(2).
20. Provide a current copy of Applicant's AML compliance program, policies, and/or procedures.

V. MARKETING/ADVERTISING

21. Provide an advertising and marketing plan to customers and potential customers in the State of Tennessee prior to commencement of operations and during the first full year of operations if licensed for sports gaming in the State of Tennessee.

The plan should include, but not be limited to:

 - Communication mediums to be used (e.g., magazine, television, radio);
 - Format of advertising and marketing;



- Responsible gaming messages or information accompanying advertising and marketing, frequency of advertising and marketing;
- Methods used to ensure advertising and marketing is not directed to persons under the age of 21 years;
- Methods used to ensure advertising and marketing is not directed to persons placed on an exclusion list; and
- Any other relevant information.

22. Will the applicant offer complimentaries, bonuses, free play, refunds or discounts, rebates, or other promotions for customers or potential customers?

☐ Yes, Provide Attachment

☐ No

If the answer is "Yes," provide a copy of the policies, procedures, terms, and rules of any such program or promotion and a list of key personnel, employees, contractors, or other agents or representatives with authority to offer, approve, or oversee complimentaries, bonuses, free play, refunds or discounts, rebates, or other promotions.

23. Will the applicant offer a customer rewards or loyalty program for sports gaming in the State of Tennessee?

☐ Yes, Provide Attachment

☐ No

If the answer is "Yes," provide the terms and conditions of the rewards program and a summary of sports gaming activity required to participate, types of rewards and benefits awarded, and how rewards and benefits are earned and awarded. Provide a summary of how a customer enrolls in the program, monitors activity, and closes a rewards account, the security and privacy policies and procedures to protect customers enrolled in the program, and any other relevant information. If a bettor enrolls in this customer rewards or loyalty program for sports gaming in the State of Tennessee, do you auto-enroll the bettor in any other rewards programs? If yes, how is information shared among those programs?

VI. RESPONSIBLE GAMING

24. Provide a responsible gaming plan for sports gaming operations in the State of Tennessee, in accordance with SWC Rules 1350-01-.05(3)(e) and 1350-01-.06(8).
25. Notwithstanding a patron's use of responsible gaming tools, will the applicant's House Rules offer the same maximum wager limits for all patrons for all wagering markets offered in Tennessee?



☐ Yes, Provide Attachment

☐ No

If the applicant intends to provide lower maximum wager amounts for certain patrons, provide information within the attachment regarding the method by which the applicant will identify and select certain patrons to have lower maximum wager limits, including information on how the new maximum wager amount is determined.

VII. TECHNOLOGY

26. Provide the policies, procedures, and mechanisms for customer exclusion and limitation, including the ability of customers to self-exclude or self-limit and for licensee-initiated exclusion or limitation of customers.
 - Indicate how the applicant will prevent persons on the exclusion lists from accessing or establishing a customer account to wager.
 - Indicate how the applicant will prevent persons on the exclusion lists from receiving direct advertising or marketing, including offers of complimentaries, bonuses, free play, refunds or discounts, rebates, or other promotions.
27. Provide policies, procedures, and mechanisms to ensure compliance with the requirement that wagers occur within the boundaries of the State of Tennessee.
 - Provide copies of any agreement with a Geolocation Service Vendor or other provider to restrict the placement of wagers outside the state.
28. Identify the location of the server to process wagers within the State of Tennessee.
 - Provide copies of any agreement with a data center, server hosting center, or other server location. Include a security plan to ensure the server is secure and protected.
29. List all software, hardware, and systems to be used by the applicant for sports gaming operations in the State of Tennessee, including, but not limited to, account wagering, live/in-game/in-play, risk management, lines or odds, rewards or loyalty, pari-mutuel, or other software, hardware, or systems required for sports gaming operations in the State of Tennessee.
 - Provide copies of any agreement with a software, hardware, or systems provider specific to sports gaming or sports gaming systems.



30. Provide Applicant's Sports Gaming System Operational Assessment performed by an Independent Testing Laboratory.
31. Provide Applicant's Sports Gaming System Technology Integrity and Security Assessment performed by an Independent Testing Laboratory.
32. Provide documentation of the scope of work agreed to by Applicant and the Independent Testing Laboratory for questions 30 and 31 (such as a letter of engagement, etc.).

VIII. MISCELLANEOUS

33. Provide Applicant's proposed Internal Control Standards in accordance with SWC Rules 1350-01-.05(2)(g), 1350-01-.05(3)(d), and Chapter 1350-03.
34. Provide Applicant's methodology for determining whether or not a player is ineligible to wager pursuant to Tenn. Code Ann. § 4-49-112 and SWC Rule 1350-01-.02(55).