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August 9, 2016

VIA EMAIL

Marie Bell, Executive Secretary
State Gaming Control Board
1919 College Parkway
Carson City, Nevada 89706

**Re: Sports Book Combine;
Draft Regulations 5 and 22 dated July 7, 2016**

Dear Executive Secretary:

I am writing on behalf of our client, Sports Book Combine ("SBC"), in regard to the Gaming Control Board's Notice of a Regulatory Workshop dated August 4, 2016. Specifically, the purpose of this letter is to notify the Board of SBC's comments to the draft amendments to NGC Regulation 5 dated July 7, 2016.

First, SBC requests that draft Regulation 5.225(15) be revised to include the following language (in bold italics):

A licensee shall not allow a patron to electronically transfer funds from their wagering account to any other patron's wagering account ***unless the other wagering account is held by a licensed book.***

This amendment clarifies that a licensed book may transfer funds from a patron's wagering account to a wagering account held by a book. Such transfers may occur when a book places a lay-off wager with another book, using its wagering account.

Second, SBC requests that Regulation 5.225(12) be revised to include the following language (again, in bold italics):

Debits ~~to~~ ***from*** a wagering account may be made by the following means:

- (a) Withdrawals;
- (b) Amounts wagered by the patron;
- (c) Transfers to a game or gaming device;
- (d) Adjustments made by the licensee following the resolution of a dispute;
- (e) ***Service or other transaction-related charges authorized by the patron;*** or
- (~~e~~f) Debits as otherwise approved by the chairman.

We believe this language was unintentionally omitted from draft Regulation 5.225(12) due to the fact that it appears in the definition of a wagering account as set forth in draft Regulation 5.225(1)(d). Specifically, draft Regulation 5.225(1)(d) defines a "wagering account" to include transactions involving "service or other transaction-related charges authorized by the patron."

Additionally, Regulation 22.160(3)(b) currently allows for wagering account debits to be made for service or other transaction-related charges authorized by the patron. Consequently, we contend that draft Regulation 5.225(12) should be amended, as detailed above, to accurately reflect the definition of a wagering account, as set forth in draft Regulation 5.225(1)(d).

Thank you for your consideration of this request.

Best regards,

A handwritten signature in black ink, appearing to read "Glenn J. Light", with a long horizontal flourish extending to the right.

Glenn J. Light

cc: Michael Russell