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VIA EMAIL

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

Re: Sports Book Combine; Draft Regulation 5 dated October 14, 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 October 27, 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 October 14, 2016.

Respectfully, SBC requests that draft Regulation 5.225 be revised as follows:

- Reg 5.225(9) - "Funds may be deposited ~~by a patron~~ into ~~their~~ a wagering account as follows..."
- Reg 5.225(10) states "Funds may be withdrawn ~~by a patron~~ from ~~their~~ a wagering account as follows..."

The draft language, as currently written, is too limiting and stifles future innovation regarding funding and withdrawal mechanisms that are not initiated by the patron. Additionally, several subsections already include the "patron" language. For example, 5.225(9), subsections (c), (d), and (f), and 5.225(10), subsections (a), (b), (c), (d), and (f), all include language limiting those types of deposits or withdrawals to a "patron." By including this language in the introductory clause, this imposes this limitation on all subsections—which is confusing given the separate use of "patron" in the specific subsections. Therefore, we respectfully request that the above revisions are implemented by the Board.

Thank you for your consideration of this request.

Best regards,



Glenn J. Light

cc: Michael Russell