

Comments in Support of amendments to Regulation 5.225 to allow for peer to peer wagering. GCB Notice #2021-74.

Greetings Secretary Bell, Chairman Gibson and Members of the Board,

This firm represents Buddybet Group Pty Ltd. (**Buddybet**).

We appreciate the opportunity to provide comments and support in respect of potential amendments to NGC Regulation 5.225. As previously communicated, Buddybet is a licensed Betting Exchange Operator in the Northern Territory of Australia, who operates and manages a peer-to-peer wagering (also known as “exchange wagering”) platform that digitizes wagers placed between individuals. Buddybet’s peer-to-peer wagering platform is an innovative sports wagering platform that provides sports bettors an alternate method of wagering. The company is licensed by the Northern Territory Gaming and Racing Authorities.

Buddybet provides this submission in support of its formal request for peer-to-peer wagering to be included within Nevada’s existing regulations for the reasons outlined in this letter, including but not limited to the following:

We have previously provided background regarding our peer-to-peer wagering business model, particularly detailing the Buddybet operations, product and processes, current regulatory oversight and applicable Nevada gaming laws and regulations. In summary:

- Peer-to-peer wagering, as a regulated interactive gaming offering, gives Nevada complete visibility over who is betting on what event, provides an additional source of tax and licensing revenue, and continues to develop the body of data to protect the integrity of events and the interests of the players and the public. In essence, peer-to-peer wagering simply digitizes wagering between and among friends that already exists, under rigorous regulatory oversight. Not regulating it may result in consumers seeking it out with other offshore, illegal or unscrupulous operators.
- The Legislature has given broad discretion to the Board and Nevada Gaming Commission (**the Commission**) to establish rules and regulations for all types of interactive gaming.
- Peer-to-peer wagering can be approved within the same regulatory controls already in place under Regulation 5A.
- We are in support of the proposed amendments to regulation 5.225 that extend the Definition of “interactive gaming” to “Includes, without limitation, Internet poker **and Peer-to-Peer wagering**”.

Buddybet proposes that the Board approve peer-to-peer wagering as a type of interactive gaming permitted under the Legislature’s directives and the discretion given to the Board and the Commission. The regulatory structure for appropriate approvals and the public safeguards are already in place. Approving peer-to-peer wagering will assist Nevada in keeping pace with legislative schemes that exist and are developing in other states and expands the online games available in Nevada. Thank you for your consideration and we are glad to respond to any questions or provide additional information.

Sincerely,

Dennis Neilander

NV Gaming Counsel for Buddybet