



XYverify Corp.  
210 East 15<sup>th</sup> Street  
New York, NY 10003

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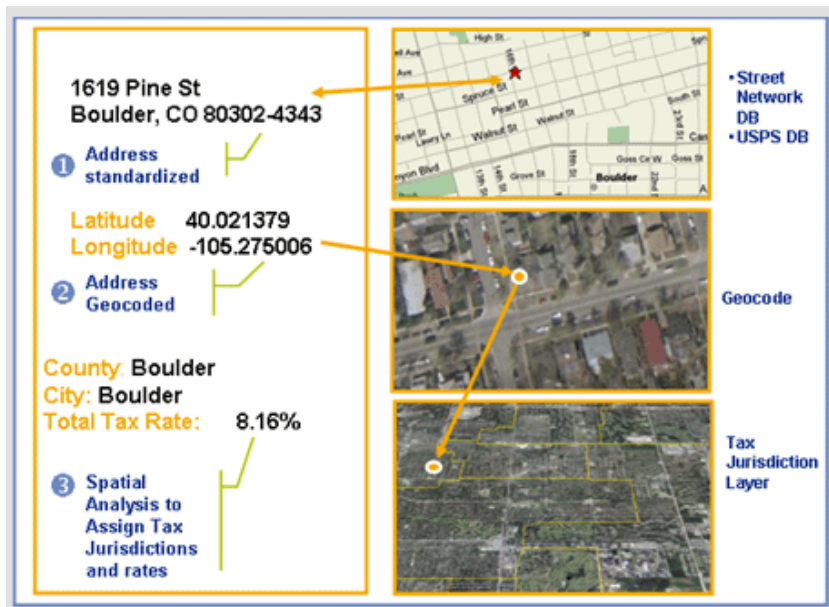
Sally P. Elloyan, Executive Secretary  
Nevada Gaming Commission  
1919 College Parkway  
Carson City, NV 89702

**Re: Comments - Notice of Request Concerning Interstate Agreements for Interactive Gaming**

Dear Ms Elloyan:

XYverify Corp., a NGC licensed Geolocation Services Provider is providing the Commission information on geolocation technology applications we believe are relevant to framework of interstate revenue sharing arrangements.

XYverify can reliably determine where a wager is taking place based on the location of the player’s mobile phone at time of transaction. We believe this same technology verification requirement (i.e., cell tower triangulation), being adopted by Nevada’s licensees, can be incorporated into regulatory language to provide an accurate, “non-spoofable” record of player location that can reliably identify and report specific city, town, Indian reservation or other player location at time of wager to include the relevant State and/or local tax or use tax rate(s) data appended and cross referenced to the player’s wager transaction. See example below:



**Fig. 1 XYverify Player Jurisdiction and Transaction Tax Settlement**

XYverify's mobile device cell tower triangulation technology, along with other location intelligence tools have particular usefulness in determining both player location in the event of disputes, and in determining the taxing authority and related tax rate(s) imposed by the taxing authority in an interactive gaming environment.

Therefore, we suggest the Board consider including the cell network based mobile geolocation service platform technologies offered by XYverify and potentially all NGC licensed Geolocation Service Providers, as a recommended technology practice to determine player location and store that along with the wager, as a new tool for audit and compliance among interstate agreements the Board is now considering.

We believe this mobile device-based geolocation intelligence technology recommendation and solution approach presents a simple, effective method to consider in regulatory language based on the same proven technology and best-practices for intrastate gaming in Nevada. Best practices for Nevada intrastate location verification for player compliance are already contemplated to be electronically stored and retained by the interactive license holders so applying this same approach to both tax calculations, revenue share and nexus control over potential disputes is a natural approach that should not cost operators any additional burden or fees beyond what they are required or planning for regulated tax calculations and player verifications.

Our Company has full electronic access to these state/local tax tables, maps, and databases to facilitate such service platform approach in every region of the United States. In this way, specific counties, and local cities set and determine tax rates with confidence knowing they can audit and secure new tax revenue from interactive interstate gaming.

Upon request, we are pleased to share more implementation detail and provide online demonstrations, or present approach at a future regulatory workshop.

Sincerely,

Elliot Klein  
CEO  
XYverify Corp.  
[elliott@xyverify.com](mailto:elliott@xyverify.com)  
(mobile): 646-709-3688  
[www.xyverify.com](http://www.xyverify.com)