



SOUTH DAKOTA COMMISSION ON GAMING

445 E. Capitol Avenue • Pierre, SD 57501
(605) 773-6051 • dor.sd.gov/gaming

NOTICE OF ADMINISTRATIVE HEARINGS AND QUARTERLY BUSINESS MEETING

NOTICE IS HEREBY GIVEN that the South Dakota Commission on Gaming will hold its quarterly business meeting and administrative hearings on Tuesday, September 12, 2023 beginning at 9:00 a.m. MDT in the City Commission Chambers at Deadwood City Hall, 102 Sherman Street, Deadwood, South Dakota.

Join Zoom Meeting

<https://state-sd.zoom.us/j/98515954519?pwd=RUIzbjNSem1uWlpsV1lYnJpV3IBUT09>

Meeting ID: 985 1595 4519

Passcode: : 085881

Dial

+1 669 900 9128 US (San Jose)

When prompted enter the Participation ID: 98515954519

When prompted enter the passcode: 085881

When prompted state your name followed by the #

All participants will be muted when joining the meeting.

Dial in participants *6 mute/unmute, * 9 to raise your hand

AGENDA

Call to Order

Conflicts of Interest Disclosure

Approval of Meeting Agenda **Pages 1 - 2**

ADMINISTRATIVE HEARINGS

1) In the matter of seized slot machines:

- One Four Times Diamond themed slot machine with Serial # 1359395 **Pages 3 - 5**
- One Spider-Man 2 themed Pachinko style slot machine with Serial # A038107 **Pages 6 - 9**

QUARTERLY BUSINESS MEETING

Approval of the minutes of Quarterly Meeting of June 13, 2023 **Pages 10 - 21**

Old Business

Comments Executive Secretary Susan Christian

Approval of Integrity and security assessment scope per ARSD 20:18:35.01:07 **Pages 22 - 23**

- Odds On Compliance **Pages 24 - 48**
- Vantage Points Solution **Pages 49 - 62**

Approval of Stipulation and Assurance of Voluntary Compliances

- INTERNET SPORTS INT', LTD-ISS SDCG LIC #'s 12253-SW Complaint # 23-05-025-JM **Pages 63 - 67**
- Brian Kindsfater SDCG Lic. # 0081-00-KY Complaint # 23-05-029-JM **Page 68 - 72**

Deadwood Licensing Matters **Pages 73 - 91**

Approval of next quarterly commission meeting

- Tuesday December 12, 2023

Public Comment

Executive Session pursuant to SDCL 1-25-2

Adjournment

Susan Christian
SUSAN CHRISTIAN, CIA
Executive Secretary

For access, persons with special needs may call the Commission office (605) 578-3074.



SOUTH DAKOTA COMMISSION ON GAMING

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INCIDENT : Slot Machine for Sale # 23-08-067

DATE OF INCIDENT : 8-24-23

PLACE OF INCIDENT : Deadwood, SD

INVESTIGATING AGENT : Heltzel

DATE OF REPORT : 08/28/23

**COMPLAINANT
OR SUSPECT:** Larry Carr



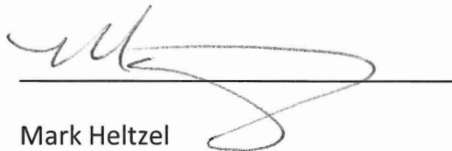
NARRATIVE :

On August 24th, 2023, while walking through the event center at the Deadwood Mountain Grand I came across a slot machine that was going to be in an auction. I stopped and inspected the slot machine; it was manufactured by IGT in April of 2004 and the theme of the game was Four Times Diamond. I opened the slot machine door and observed the CPU and the logic board. I closed the door and began looking for a representative of the Auction company.

I was introduced to Todd McPherson, I introduced myself and showed him my credentials. I informed Todd that a private individual could not possess or have under his control a slot machine and a violation was a class 1 misdemeanor. I told Todd that he would not be allowed to sell the slot machine and that I would be seizing the device. Todd and I worked out a time for me to collect the device, he gave me the owners name and contact information and stated they would remove it from the auction.

On the morning of August 25th, 2023, at 8am I returned to the Deadwood Mountain Grand event center and talked with Kevin McPherson. I provided Kevin with a couple of state statutes that discussed the possession of slot machines for future reference and had him sign a Commission on Gaming Receipt (# A 0446) for the slot machine I confiscated. I told Kevin I would call Larry and explain what happened and the process moving forward.

On August 25th, 2023, at approximately 9:55am I called the 605-381-7605 and left a voicemail for Larry. I asked Larry to return my call at 605-578-3074. On August 25 at 6:24pm Larry returned my phone call and left a voicemail. On August 28th, 2023, I was able to talk with Larry. I informed him that per south Dakota state law he was not allowed to own the slot machine and that I had seize the device. I told Larry that we would have a hearing in front of the South Dakota Commission on Gaming on September 12th, 2023, and ask that the device be declared contraband and destroyed. I informed Larry that he was more than welcome to come to the hearing and testify if he wanted but that was not required. I collected Larry's information and told him I would send him a copy of my report and documentation.

A handwritten signature in black ink, appearing to read 'MH', is written over a horizontal line. The signature is stylized and extends below the line.

Mark Heltzel

Deputy Executive Secretary





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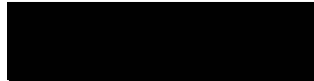
INCIDENT REPORT

INCIDENT: Illegal Slot Machine

INCIDENT NUMBER: 23-08-066

DATE OF INCIDENT: 08/27/2023

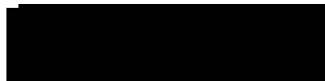
PLACE OF INCIDENT:



INVESTIGATING AGENT: Brandon Snyder

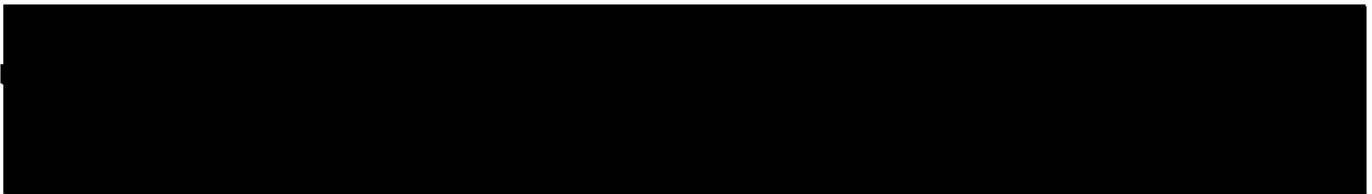
DATE OF REPORT: 08/27/2023

PATRON: Timothy Ray Evans



NARRATIVE:


On Sunday, August 26th, 2023, I, Special Agent Brandon Snyder was notified of a slot machine for sale on Facebook marketplace, by Deputy Executive Secretary Mark Heltzel. The Facebook at listed a Spider-Man 2 slot machine, that worked and comes with tokens for \$1000. The listing profile was for Tim Evans.



At about 1650 hours I arrived at [REDACTED] and contacted Tim. I identified myself and provided Tim copies of SDCL 22-25-1, 22-25-13, 22-25-14, and 22-25-14.1. Tim gave consent to enter his home and inspect the machine. I observed the machine to have a manufacturer date of 01/25/2007. Tim stated he got the machine a few years ago in Wyoming for \$1000. He stated he was unaware of the laws.

I informed Tim I would be seizing the machine and provide him with a property receipt. I also informed him he could come to the September 12th Commission meeting to plead his case. Tim assisted in loading the machine into the back of my unmarked patrol vehicle. I transported the machine back to our office at 87 Sherman Street.

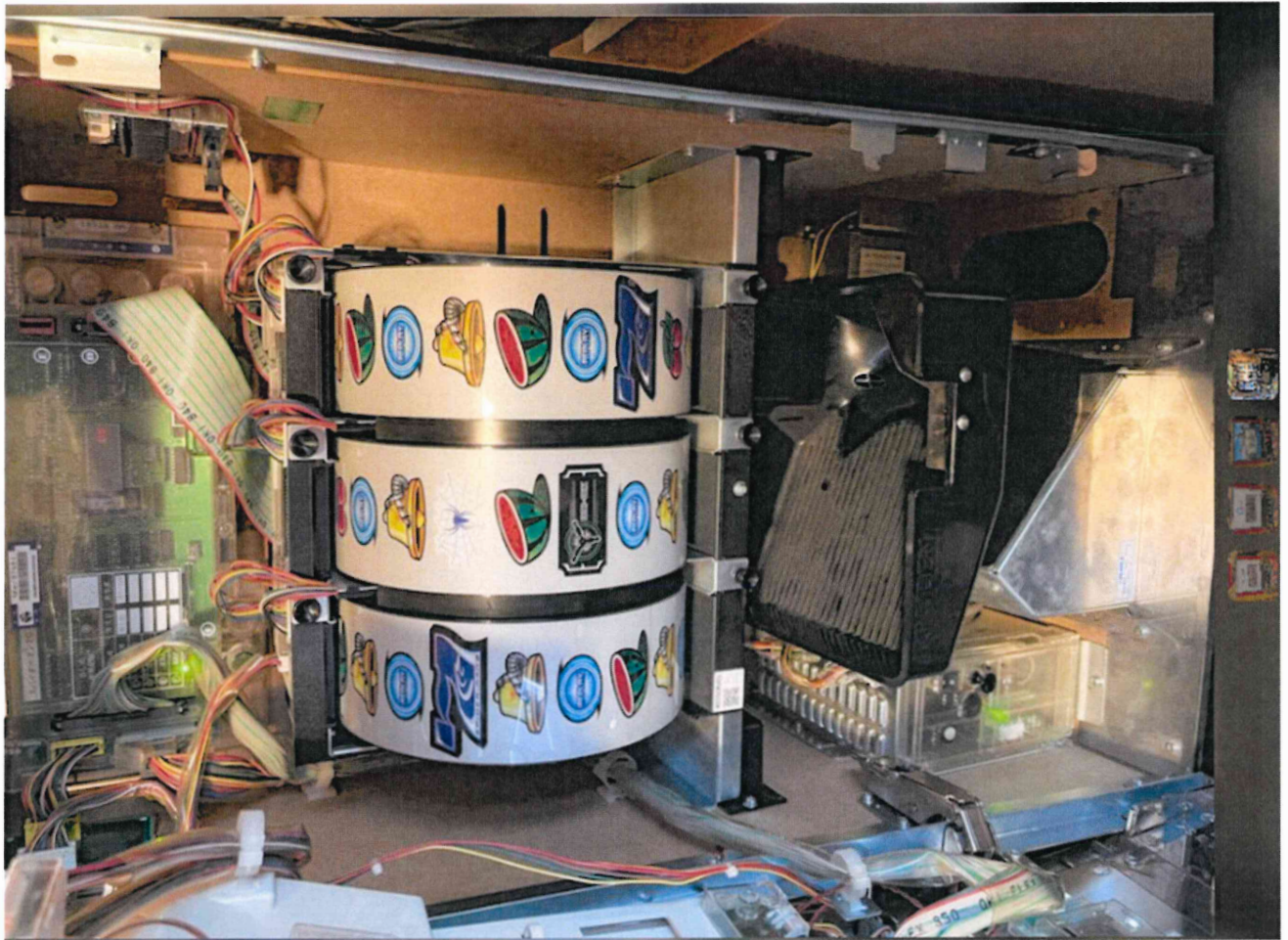
END OF REPORT



Brandon S. Snyder

SPECIAL AGENT – INVESTIGATIONS / ENFORCEMENT
SD COMMISSION ON GAMING

Serial #
A038107



22-25-13. Keeping slot machines--Free play machines excepted--Misdemeanor--Manufacture not prohibited.

No person may have in his possession, custody, or under his control or permit to be kept in any place under his possession or control, any slot machine or device. A slot machine or device is any machine upon the action of which anything of value is staked and which is operated by placing therein or thereon any coins, checks, slugs, balls, chips, tokens, or other articles, or in any other manner as a result of such operation anything of value is won or lost by the operation of such machine, when the result of such operation is dependent upon chance. This section does not extend to coin-operated nonpayout pin tables and arcade amusements, with free play features. **A violation of this section is a Class 1 misdemeanor.**

This section does not prohibit the manufacture, or any act appurtenant to the manufacture, of slot machines or devices in this state for distribution and sale.

Source: SDC 1939, §§ 24.0204, 24.9909; SL 1974, ch 166; SL 1976, ch 158, § [25-4](#); SL 1989, ch 197, § 1.

22-25-14. Slot machine and premises public nuisance--Manufacture not prohibited.

All slot machines capable of being used for gambling and places where they are kept or operated together with all property of any kind kept or used in connection with operation of the same, are hereby declared to be public nuisances.

This section does not prohibit the manufacture, or any act appurtenant to the manufacture, of slot machines, or devices in this state for distribution and sale.

Source: SDC 1939, § 24.0205; SL 1989, ch 197, § 2.

22-25-14.1. Antique slot machine operated for nongambling purposes as defense--Preservation and return of antique machines.

It is a defense to any prosecution under §§ [22-25-13](#) and [22-25-14](#) if the defendant shows that the slot machine is an antique slot machine and was not operated for gambling purposes while in the defendant's possession. For the purposes of this section, a slot machine shall be conclusively presumed an antique slot machine if it is twenty-five or more years old. Whenever such defense is offered, no slot machine seized from any defendant may be destroyed or otherwise altered until after a final court determination including review upon appeal, if any, that such defense is not applicable. If the defense is applicable, any such slot machine shall be returned pursuant to provisions of law providing for the return of property. It is the purpose of this section to protect the collection and restoration of antique slot machines not presently utilized for gambling purposes because of their esthetic interest and importance in South Dakota history.

Source: SL 1977, ch 191; SL 1994, ch 168.



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UNAPPROVED MINUTES

**South Dakota Commission on Gaming Administrative Hearings,
Public Hearing to Adopt Rules, and
Quarterly Business Meeting
Deadwood City Hall, Deadwood, South Dakota**

MINUTES

June 13, 2023

At 9:00 a.m. the meeting was called to order. Chairman Karen Wagner, Commissioner Spencer Hawley, and Commissioner Bob Goetz were present. Commissioner Christianson was unable to attend the meeting. Staff members present for the meeting were Doug Abraham, Commission Attorney; Susan Christian, Executive Secretary; Mark Heltzel, Deputy Executive Secretary; Kelly Hanson, Operations Manager; and Phil Schlieff, IT Specialist.

The meeting was called to order by Chairman Wagner at 9:00 a.m. and a quorum was present.

On a roll call all Commissioners were present.

Commissioner Goetz
Commissioner Hawley
Chairman Wagner

Conflicts of Interest Disclosure

On a roll call no conflicts of interest were disclosed.

Commissioner Goetz	Nay
Commissioner Hawley	Nay
Chairman Wagner	Nay

Election of Chair and Vice Chair for Fiscal Year 2024

Commissioner Goetz made a motion to reappoint Commissioner Wagner as the Chairman. Commissioner Hawley seconded the motion which carried unanimously.

Commissioner Hawley made a motion to nominate Commissioner Christianson as the Vice Chairman. Commissioner Wagner seconded the motion which carried unanimously.

With no other nominations Commissioner Wagner is the Chairman and Commissioner Christianson is the Vice Chairman.

SDCG Meeting Minutes June 13, 2023

Adoption of Quarterly Business Meeting Agenda

There was one change on the agenda under the Deadwood licensing section to add three licenses to the business renewal list.

Commissioner Goetz made a motion to adopt the meeting agenda. Commissioner Hawley seconded the motion which carried unanimously.

Rules to be Adopted, Repealed, and Amended

Susan Christian, Executive Secretary, presented the proposed changes for each rule, the opportunity for public comment was offered and no member of the public testified in regard to the proposed change.

Racing Rules:

1) 20:04:27:12 Penalty for use of illegal substances

Commissioner Hawley made a motion to approve the adopted rule change as presented. Commissioner Goetz seconded the motion which carried unanimously.

2) 20:04:27:13.13 Maximum threshold for Phenylbutazone (bute)

Commissioner Goetz made a motion to approve the adopted rule change as presented. Commissioner Hawley seconded the motion which carried unanimously.

3) 20:04:27:14 Restrictions on use of authorized drugs

Commissioner Hawley made a motion to approve the adopted rule change as presented. Commissioner Goetz seconded the motion which carried unanimously.

4) 20:04:27:16 Penalty for violation of permitted drug restrictions

Commissioner Goetz made a motion to approve the adopted rule change as presented. Commissioner Hawley seconded the motion which carried unanimously.

5) 20:04:27:17 Penalties for violations

Commissioner Hawley made a motion to approve the adopted rule change as presented. Commissioner Goetz seconded the motion which carried unanimously.

Administrative Hearing

The following cases were scheduled to be heard:

- In the matter of seized slot machines:
 - One Pachislo Double Chance themed slot machine Serial#01123657
 - One Pachislo Babel themed slot machine Serial #HPS0011-25953

- SDCG Case#23-05-023
 - SDCG vs. Gary King, SDCG LIC#12201-KY

Chairman Wagner served as the hearing officer.

The matter of seized slot machines

The purpose of the hearing is to determine if the Double Chance themed slot machine Serial #01123657 and the Babel themed slot machine Serial #HPS0011-25953, which was seized from 2011 Helios Street in Rapid City, SD on March 17, 2023, is contraband and may be destroyed pursuant to SDCL 42-7B-39. Derek Nelson was served notice of the hearing by certified mail but was not present. The decision on this matter was deferred to Executive Session.

Gary King

The purpose of the hearing is that an Initial complaint was filed stating that Mr. King had his South Dakota Resident Insurance Producer License revoked and the Business Entity License of Cypress Risk Management LLC was revoked on March 8, 2023, by the South Dakota Division of Insurance in which a hearing examiners' proposed findings of fact, conclusion of law found Gary King through Cypress Risk Management used fraudulent, coercive, or dishonest practices, or demonstrated incompetence, untrustworthiness, or financial irresponsibility in the conduct of business in the state or elsewhere, in violation of SDCL 58-30-617(8). Mr. King was served notice of the hearing by certified mail but was not present. An email was received stating that Mr. King voluntarily surrendered his gaming license but have not received the license yet. Staff is recommending revocation of his gaming license. The decision on this matter was deferred to Executive Session.

The hearing portion of the meeting was concluded at 9:31 a.m.

General Meeting

Chairman Wagner called the general meeting to order at 9:32 a.m.

March 14, 2023, Quarterly Meeting

Commissioner Goetz made a motion to adopt the minutes as drafted for the March 14, 2023, quarterly meeting. Commissioner Hawley seconded the motion which carried unanimously.

April 24, 2023, Special Meeting

Commissioner Hawley made a motion to adopt the minutes as drafted for the April 24, 2023, special meeting. Commissioner Goetz seconded the motion which carried unanimously.

Old Business

There was no old business to be discussed.

Remarks by Executive Secretary

Susan Christian, Executive Secretary, gave a brief report on the following items:

- Our office has three new staff members Marcus Clyne, Slot Specialist, John Cargill, Agent, and Autumn Carrico, Auditor.
- Staff will be relicensing the next two weeks, and the stamp fees are due June 30th.
- Thanked the industry for the way they handled the implementation of the new rules regarding the underage gaming and the on-premises monitoring. Mark and Kelly will be touching base with each casino to confirm the way it will be monitored.
- The live horse racing season will be held October 7th and October 8th, in Ft. Pierre. Rule booklets have been ordered to give to all trainers and when an individual gets their license at the track will then get a copy of the booklet. A notice will be sent out on the new rule changes and the new dates on the ARCI method.
- The new office will be ready to move into around September 15th and are still looking for office space in Deadwood for two agents, and a slot specialist. Potentially in the next fiscal year will be requesting to add more employees.
- On April 11, 2023, attended the GLI Roundtable in Las Vegas with Mark Heltzel and Kelly Hanson. A takeaway from the roundtable was the sports wagering platform discussion talking about cyber security, testing, and the need to have the platforms continually monitored. Once Cashless Wagering and Advance Deposit starts then there is another platform to monitor.
 - Mark Heltzel's takeaway from the roundtable was a push in the industry on the yearly integrity testing, quarterly vulnerability testing, AWS server, the need for two factor authentication, and the different complexities of passwords.
- In July will be attending the NCLGS Roundtable with Doug Abraham in Denver and will also be attending the Sports Betting Regulators Association meeting.

Remarks by Representative of Gaming Laboratories International

Steven May, Client Solutions Executive, for Gaming Laboratories International, gave a brief report on testing and consulting services.

Approval of GLI contract for Device Testing and Consulting Services

Commissioner Hawley made a motion to approve the contract with Gaming Laboratories International. Commissioner Goetz seconded the motion which carried unanimously.

Live Racing Matters

Condition Book

Susan Christian, Executive Secretary, stated that staff recommended approval of the Verendrye Benevolent Association condition book as listed on pages 64-70 in the meeting packet for the 2023 live horse racing season.

Commissioner Goetz made a motion to approve the condition book. Commissioner Hawley seconded the motion which carried unanimously.

Allocations

Susan Christian, Executive Secretary, stated that staff recommended the proposed resolutions for the allocation of funds to the Verendrye Benevolent Association for the 2023 live horse racing season.

Resolution 06-13-23-01

The allocation of funds from the Revolving and Bred funds for purse supplements and racing operations for the 2023 live horse racing season.

Commissioner Hawley made a motion to approve Resolution 06-13-23-01. Commissioner Goetz seconded the motion which carried unanimously.

Resolution 06-13-23-02

The allocation of funds from Revolving fund for the Jockey bonus for the 2023 live horse racing season.

Commissioner Goetz made a motion to approve Resolution 06-13-23-02. Commissioner Hawley seconded the motion which carried unanimously.

Track Bond and Insurance

Susan Christian, Executive Secretary, stated that staff recommended that as a condition of any horse track's license that the corporation or association which holds the license obtain an insurance policy or policies with the limits of \$1 million naming the South Dakota Commission on Gaming and its agents and employees as additional insured. The policy or policies shall include general liability, liquor liability, jockey insurance, and horse racing activities.

The Executive Secretary also stated that staff recommended that the track be required to obtain a bond, deposit in lieu of bond, or letter of credit to be used, if necessary, to pay purses, salaries, wages, and payments to vendors for goods and services provided to the corporation or association in conducting its racing operations in the amount of \$25,000.00.

Commissioner Goetz made a motion to approve the track insurance and bond of \$25,000.00. Commissioner Hawley seconded the motion which carried unanimously.

Verendrye Benevolent Association Horse Racing Officials

Commissioner Hawley made a motion to approve the Verendrye Benevolent Association horse racing officials for the 2023 live horse racing season. Commissioner Goetz seconded the motion which carried unanimously.

Commission Horse Racing Officials

Commissioner Goetz made a motion to approve the Commission horse racing officials for the 2023 live horse racing season. Commissioner Hawley seconded the motion which carried unanimously.

Horse Racing Contracts

Cooper Animal Clinic Center for Tox Services Consulting Contract Stanley County Sheriff Cooperative Agreement

Commissioner Goetz made a motion to approve the horse racing contracts as listed above for the 2023 live horse racing season. Commissioner Hawley seconded the motion which carried unanimously.

Deadwood Licensing Matters

Key License Approvals

Deputy Executive Secretary Heltzel recommended approval of the following:

- Trista Stees
- Stuart Kopp
- Robert Wood
- Virginia McDowell
- Pierre Bouchut
- Jette Nyaard-Andersen
- Charles Wallin

Commissioner Hawley made a motion to approve the Key license approvals as staff recommended. Commissioner Goetz seconded the motion which carried unanimously.

Business License Renewals

Deputy Executive Secretary Heltzel recommended the approval of all Operators, Route Operators, Retails, Distributors, Manufacturers, Associated Equipment, and Sports Wagering Service Provider licenses as listed on pages 101-102 of the meeting packet with the addition of Rushmore Gaming license renewal of a Sports Wagering Service Provider license, Operator license, and Route Operator license.

Commissioner Goetz made a motion to approve the Business license renewals as staff recommended. Commissioner Hawley seconded the motion which carried unanimously.

Date of Next Meeting

The next quarterly meeting is scheduled for September 12, 2023.

Executive Session

Commissioner Goetz made a motion to go into Executive Session. Commissioner Hawley seconded the motion which carried unanimously.

At 10:19 a.m. the Commissioners went into Executive Session pursuant to SDCL 1-25-2 and 42-7B-8.1

The Executive Session was concluded at 10:47 a.m. with the following action taken.

Decision on Administrative Hearings

Decision Seized Slot Machines

Commissioner Hawley made a motion that the One Pachislo Double Chance themed slot machine Serial #01123657 and the One Pachislo Babel themed slot machine Serial #HPS0011-25953 owned by Derek Nelson are contraband and they may be destroyed pursuant to SDCL 42-7B-39. Commissioner Goetz second the motion which carried unanimously.

Decision SDCG vs. Gary King

Commissioner Goetz made a motion to revoke the license of Gary King SDCG license#12201-KY. Commissioner Hawley seconded the motion which carried unanimously.

Public Comment

Shane Kramme, General Manager of the Verendrye Benevolent Association, thanked the South Dakota Gaming Commission and Executive Secretary Susan Christian for providing this opportunity for Ft. Pierre horse racing and looking forward to the 75th year.

Adjournment

With no further business to be discussed Commissioner Goetz made a motion to adjourn the meeting. Commissioner Hawley seconded the motion which carried unanimously.

The meeting was adjourned at 10:50 a.m.

Respectfully Submitted,

Kathy Beringer

Karen Wagner, Madam Chairman

Susan Christian, Executive Secretary



SOUTH DAKOTA COMMISSION ON GAMING

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RESOLUTION NUMBER 06-13-23-01

The South Dakota Commission on Gaming hereby makes the following allocations for purse supplements and racing operations to the Verendrye Benevolent Association for the 2023 live horse racing season:

From the South Dakota Bred Racing Fund:

\$50,000.00 for purses for races that are restricted to South Dakota Bred horses including stakes races;

\$6,000.00 for purses for open races

\$625.00 per racing day from the South Dakota Bred Racing Fund, not to exceed a maximum of

\$1,250.00 for point money for South Dakota bred horses that compete in races that are not restricted to South Dakota bred horses and on which pari mutuel wagers are accepted at the Stanley County Fairgrounds

\$1,500.00 per racing day from the South Dakota Bred Racing Fund, not to exceed a maximum of \$3,000.00, for bonuses paid to the breeder of the winner of every race won by a South Dakota Bred horse

From the Special Racing Revolving Fund:

\$83,340.00 from for racing operations

\$30,000.00 from Special Racing Revolving Fund for purses

None of the allocated funds above may be used as purse supplements to any race in which less than five (5) qualified horses have been entered under the supervision of a state steward.

Track management is authorized to make adjustments in the above categories with prior approval of the Executive Secretary of the Commission.

These funds shall be made available to the race tracks upon approval of vouchers by the Executive Secretary and the purpose for which these funds are used shall be subject to an audit by the Commission's audit staff after the financial reports required by ARSD 20:04:20:10 have been furnished to the Commission. Any funds that are disbursed to the corporation or association that are not used as specified above are required to be returned to the South Dakota Commission on Gaming and made available for 2023 race season's allocation.

The Executive Secretary is authorized to withhold \$ 3,200.00 from the distribution of the \$83,340.00 allocated to the Verendrye Benevolent Association for operations as a guaranteed payment of taxes and fees to the Commission until such time as the association has paid in full all taxes and fees due the Commission for the 2023 racing season.



SOUTH DAKOTA COMMISSION ON GAMING

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RESOLUTION NUMBER 06-13-23-02

Section 1. The executive Secretary is authorized to reimburse the Verendrye Benevolent Association from the Special Racing Revolving Fund for longevity payments to licensed jockeys who participate in races in South Dakota for the 2022 season according to the following criteria:

Section 2. Any jockey who has filed with the Commission staff proof of having been given a physical examination within the last year and has earned a jockey fee in at least four races per day or has been available to ride in races throughout each racing day (unless excused by the stewards in their sole discretion for a period of time not to exceed 1 racing day) at the Fort Pierre Race track shall be eligible to receive a longevity payment of Five Hundred Dollars (\$ 500.00) to be paid at the time of jockey fees for the last racing day at the fort Pierre Race Track.

Section 3. A list of jockeys who are eligible to receive longevity payments shall be provided to the Horsemen's Bookkeeper by the Presiding Steward.



SOUTH DAKOTA COMMISSION ON GAMING

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TO: Commissioners
FROM: Susan Christian, Executive Secretary
SUBJECT: Track Bond and Insurance
DATE: June 13, 2023

I recommend that the Commission require as a condition of any horse track's license that the corporation or association which holds the license obtain an insurance policy or policies with limits of \$1 million naming the South Dakota Commission on Gaming and its agents and employees as additional insured. The policy or policies shall include general liability, liquor liability, jockey insurance and horse racing activities.

I also recommend that the track be required to obtain a bond, deposit in lieu of bond, or letter of credit to be used if necessary, to pay purses, salaries, wages and payments to vendors for good and services provided to the corporation or association in conducting its racing operations in the following amount:

Verendrye Benevolent Association \$ 25,000.00

BUSINESS LICENSE RENEWAL – 2023-2024**OPERATOR. ROUTE OPERATOR & RETAIL LICENSES**

AGT- ACES FULL INC	11022-OP	GR DWD LLC	0187-OP
	11159-RO	MINERAL PALACE 1	0299-RT
MR. WU'S 1	11575-RT	MINERAL PALACE 2	0300-RT
MR. WU'S 2	11576-RT	MINERAL PALACE 3	0301-RT
MR. WU'S 3	11577-RT	MINERAL PALACE 4	0540-RT
		MINERAL PALACE 5	0541-RT
BLACK DIAMOND CAPITAL LLC	0231-OP	MINERAL PALACE 6	0542-RT
GOLD DUST 1	0588-RT	MINERAL PALACE 7	0543-RT
GOLD DUST 2	0589-RT	MINERAL PALACE 8	0544-RT
GOLD DUST 3	0590-RT	MINERAL PALACE 9	0545-RT
GOLD DUST 4	0591-RT	MINERAL PALACE 10	0546-RT
GOLD DUST 5	0592-RT	MINERAL PALACE 11	0547-RT
GOLD DUST 6	0593-RT	MINERAL PALACE 12	0548-RT
GOLD DUST 7	0594-RT		
GOLD DUST 13 (777)	0610-RT	MAIN LEDGE LLC -MIDNIGHT STAR	12782-OP
GOLD DUST 14 (777)	0611-RT	MIDNIGHT STAR 1	12783-RT
GOLD DUST 15 (777)	0612-RT	MIDNIGHT STAR 2	12784-RT
BLUE SKY GAMING INC	0199-OP	SALOON GAMBLING INC	0103-OP
TIN LIZZIE 1	0313-RT	SALOON GAMBLING INC 1	0011-RT
TIN LIZZIE 2	0314-RT	SALOON GAMBLING INC 2	0063-RT
TIN LIZZIE 3	0315-RT	SALOON GAMBLING INC 3	0393-RT
TIN LIZZIE 4	0524-RT		
TIN LIZZIE 5	0525-RT	SGMSD, LLC	13176-OP
TIN LIZZIE 7	0604-RT	SILVERADO 1	13177-RT
TIN LIZZIE 8	0605-RT	SILVERADO 2	13178-RT
TIN LIZZIE 12	0609-RT	SILVERADO 3	13179-RT
TIN LIZZIE 13	0613-RT	SILVERADO 4	13180-RT
		SILVERADO 5	13181-RT
		SILVERADO 6	13182-RT
		SILVERADO 7	13183-RT
BY DEVELOPMENT INC	0196-OP	FRANKLIN 1	13184-RT
CADILLAC JACKS 1	0302-RT	FRANKLIN 2	13185-RT
CADILLAC JACKS 2	0303-RT	FRANKLIN 3	13186-RT
CADILLAC JACKS 3	0304-RT	FRANKLIN 4	13187-RT
CADILLAC JACKS 4	0526-RT	FRANKLIN 5	13188-RT
CADILLAC JACKS 5	0527-RT	FRANKLIN 6	13189-RT
CADILLAC JACKS 6	0528-RT		
CADILLAC JACKS 7	0529-RT		
CADILLAC JACKS 8	0530-RT	THE LODGE AT DWD -DWD RESORTS LLC	0217-OP
CADILLAC JACKS 9 (SHS4)	0597-RT	THE LODGE AT DEADWOOD 1	0469-RT
CADILLAC JACKS 10	10860-RT	THE LODGE AT DEADWOOD 2	0470-RT
		THE LODGE AT DEADWOOD 3	0471-RT
DGR-ERNEST HOSPITALITY	12042-OP	THE LODGE AT DEADWOOD 4	0533-RT
DGR 1	12175-RT	THE LODGE AT DEADWOOD 5	0534-RT
DGR 2	12176-RT	THE LODGE AT DEADWOOD 6	0535-RT
DGR 3	12177-RT	THE LODGE AT DEADWOOD 7	0536-RT
DGR 4	12178-RT	THE LODGE AT DEADWOOD 8	0537-RT
DGR 5	12179-RT	THE LODGE AT DEADWOOD 9	0538-RT
		THE LODGE AT DEADWOOD 10	0539-RT
DEALS PUBLICATIONS	0197-OP		
CELEBRITY 1	11567-RT	ZCN LLC	11382-OP
CELEBRITY 2	11568-RT	DEADWOOD MT GRAND 1	11383-RT
CELEBRITY 3	12311-RT	DEADWOOD MT GRAND 2	11384-RT
		DEADWOOD MT GRAND 3	11385-RT
FIRST GOLD INC	0120-OP	DEADWOOD MT GRAND 4	11386-RT
	0011-RO	DEADWOOD MT GRAND 5	11387-RT
HORSESHOE 1	0079-RT	DEADWOOD MT GRAND 6	11388-RT
BLACKJACK 2	0081-RT	DEADWOOD MT GRAND 7	11389-RT
FIRST GOLD 3	0208-RT		
FIRST GOLD 4	0567-RT		
FIRST GOLD 5	0568-RT		
FIRST GOLD 6	0569-RT		
FIRST GOLD 7	0570-RT		
FIRST GOLD 8	0571-RT		
FIRST GOLD 9	0572-RT		
FIRST GOLD 10	0573-RT		
FIRST GOLD 11	0584-RT		

OTHER ASSIGNED LICENSES

MIDWEST MOTELS OF DWD 11330-OP
 BODEGA 1 – MIDWEST MOTELS OF DWD 11331-RT
 BODEGA 2 – MIDWEST MOTELS OF DWD 11332-RT
 BODEGA 3 – MIDWEST MOTELS OF DWD 11333-RT

BULLOCK 1 –DBUH, LLC 11985-RT
 BULLOCK 2 –DBUH, LLC 11964-RT

CLARK & APEX, LLC 12150-OP
 CLARK & APEX, LLC 12135-RT
 CLARK & APEX, LLC 12134-RT

DOOR 4, LLC-FAIRMONT 1 12187-RT
 DOOR 4, LLC-FAIRMONT 2 12188-RT
 DOOR 4, LLC-FAIRMONT 3 12567-RT

GOLD COUNTRY INN-WILLY'S WILD WEST INC 0596-RT

HICKOKS 1-DHIH, LLC 11965-RT
 HICKOKS 2-DHIH, LLC 11966-RT
 HICKOKS 3-DHIH, LLC 11967-RT

MARTIN MASON BLDG 1 0317-RT
 MARTIN MASON BLDG 2 0318-RT

SPORTSBOOK DWD-LANDMARK 12415-OP
 SPORTSBOOK DWD 1 12416-RT
 SPORTSBOOK DWD 2 12417-RT
 SPORTSBOOK DWD 3 12418-RT
 SPORTSBOOK DWD 4 13145-RT

SUPER 8 1 – GOLD RUN LLC 11110-RT
 SUPER 8 2 – GOLD RUN LLC 11111-RT
 SUPER 8 3 – GOLD RUN LLC 11112-RT

VFW 0017-RT

WOODEN NICKEL CASINO 0316-RT

DEADWOOD PARKING LOTS, LLC 0003-PO

LAMAR FEED & GRAIN, LLC 11636-PO

OPTIMA LLC-DBA TRUE BY HILTON 0005-PO

WWW, LLC 0002-PO

CALEDONIA LEDGE, LLC 12785-PO

KR DEADWOOD 12419-PO

OPERATOR, ROUTE OPERATOR & UNASSIGNED LICENSES

AGT-MICHAEL TRUCANO 0230-OP
 AGT-MICHAEL TRUCANO 10858-RO
 MICHAEL TRUCANO-OLD IRON HORSE INN 0583-RT
 SHARON GOULD 10355-OP
 1911 HOLDINGS 10020-OP
 DAKAM MOHAMED DAKAM 0264-RT
 CHRIS GOULD 0440-RT
 SRK DEVELOPMENT 11623-RT
 DEADWOOD LEGACY HOLDINGS 12000-RT
 PAT ROBERTS (OLD BEST WESTERN) 0117-RT
 MIDNIGHT STAR- LAMAR 11633-OP
 MIDNIGHT STAR- LAMAR 11634-RT
 MIDNIGHT STAR- LAMAR 11633-RT

DISTRIBUTORS

UNIVERSAL GAMING RESOURCES, LLC 0121-DS
 DYNAMIC GAMING SOLUTIONS SD LLC 11328-DS

MANUFACTURERS

AGS, LLC 0130-MA
 AINSWORTH GAMING TECHNOLOGY 11549-MA
 ARISTOCRAT TECHNOLOGIES INC 0108-MA
 ARUZE GAMING INC 0133-MA
 BLUBERI GAMING 11968-MA
 EVERI GAMES INC (MULTIMEDIA) 0131-MA
 HARMS VENDING 0129-MA
 IGT 0101-MA
 INCREDIBLE TECHNOLOGIES INC 10735-MA
 INTERBLOCK D.D. 0124-MA
 JCM AMERICAN CORP 0132-MA
 KONAMI GAMING INC 0128-MA
 NOVOMATIC AG 11561-MA
 NRT TECHNOLOGY CORP 0125-MA
 PATRIOT GAMING & ELECTRONIC INC 10044-MA
 LNW -SCIENTIFIC GAMES INC 0114-MA
 TABLE TRAC INC 0127-MA

ASSOCIATED EQUIPMENT MANUFACTURER

AVALON GAMING INC 10877-AE
 COUNTR GMBH 11376-AE
 EVERI PAYMENTS 12300-AE
 GAMING PARTNERS INTERNATIONAL USA 10983-AE
 GAMING & ENTERTAINMENT TOUCH TECH 11146-AE
 M3 TECHNOLOGY SOLUTIONS LLC 11293-AE
 OVERLAY GAMING 12634-AE
 PAVILION PAYMENTS GAMING SERVICES 11790-AE
 QUANTUM SYSTEMS SOLUTIONS 11617-AE
 STADIUM TECH 12342-AE

SPORTS WAGERING SERVICE PROVIDERS

BETMGM. LLC 12269-SW
 DAKOTA GAMING GROUP, LLC 12215-SW
 DAKOTA GAMING GROUP, LLC 12695-OP
 DAKOTA GAMING GROUP, LLC 12625-RO
 IGT 12241-SW
 INTERNET SPORTS INTERNATIONAL 12253-SW

Add. hand

Rushmore Gaming

12216-SW
 13398-OP
 12626-RO



SOUTH DAKOTA DEPARTMENT OF REVENUE

445 East Capitol Avenue • Pierre, SD 57501
(605) 773-6051 • dor.sd.gov

TO: Commissioners and Doug Abraham
FROM: Susan Christian, Executive Secretary, South Dakota Commission on Gaming
SUBJECT: Approval of scope for risk assessments for Odds on Compliance and Advantage Point Solutions
DATE: September 12, 2023

Per ARSD **20:18:35.01:06** approval has been given to Odds on Compliance and Vantage Point Solutions to be an independent information technology security professional to conduct the annual system integrity and security risk assessment providing the Commission approves the companies proposed scope of the assessment to be conducted.

A comparison to ARSD **20:18:35.01:07** of each of the company's scope submitted was conducted by staff. Based on this comparison the companies comply with the scope requirements and approval of their scope is recommended.

20:18:35.01:06. Integrity and security assessment. System integrity and security risk assessment must be performed annually on all sports wagering systems by an independent information technology security professional approved by the executive secretary.

The system integrity and security risk assessment shall be conducted no later than 90 days after commencing operations and annually thereafter.

Source: 48 SDR 14, effective August 22, 2021.

General Authority: SDCL 42-7B-7, 42-7B-11(13).

Law Implemented: SDCL 42-7B-2.1(1), 42-7B-43.

20:18:35.01:07. Integrity and security assessment -- Scope. The scope of the sports wagering system integrity and security assessment is subject to the approval of the commission and must include:

(1) A vulnerability assessment of digital platforms, mobile applications, internal, external, and wireless networks with the intent of identifying vulnerabilities of all devices, the sports wagering systems, and applications transferring, storing, and/or processing personal identifying information or other sensitive information connected to or present on the networks;

(2) A penetration test of all digital platforms, mobile applications, and internal, external, and wireless networks to confirm devices, the sports wagering systems, and applications are susceptible to compromise;

(3) A review of the firewall rules to verify the operating condition of the firewall and the effectiveness of its security configuration and rule sets that must be performed on all perimeter and internal firewalls;

(4) A technical security control assessment against the provisions adopted in Appendix B of GLI-33 and chapter 20:18:35.01 with generally accepted professional standards;

(5) An evaluation of information security services, cloud services, payment services, financial institutions, payment processors, location services, and any other services that may be offered directly by the licensee or involve the use of third parties; and

(6) At the discretion of the executive secretary, any additional assessments or specific testing criteria which may be required by internal control procedures.

Source: 48 SDR 14, effective August 22, 2021.

General Authority: SDCL 42-7B-7, 42-7B-11(13).

Law Implemented: SDCL 42-7B-2.1(1), 42-7B-43.

Odds On Compliance

Information Security Management System (ISMS) Audit Statement of Work

Prepared for the Approval of the South Dakota Commission on Gaming

I. Introduction

Odd On Compliance (OOC) is a full service consulting company that was founded in 2021. Since that time, we have helped companies both large and small navigate the patchwork of regulations throughout North America and Europe. Our services include licensing, audit, technical compliance, operational support, strategic planning, and regulatory guidance. Our team consists of experts with a wide range of experience including former regulators, gaming attorneys, auditors, and independent test lab professionals.

In accordance with Chapter 20:18:35.01 of the South Dakota Commission on Gaming (SDCG) regulations, Odds On Compliance seeks the approval of the SDCG's to conduct Information Security Management System (ISMS) audits of sports wagering systems located in South Dakota. The audits will include an assessment of the operational controls governing each sports wagering system, and the servers where sensitive information is accessed, processed, transmitted, and stored. The audit will be conducted in accordance with the information security principles as outlined in ISO/IEC 27001.

This Statement of Work (SOW) outlines the scope, objectives, and deliverables of our audits. The audit will assess the effectiveness, compliance, and overall security posture of the client's ISMS. The purpose of this audit is to identify any gaps or vulnerabilities in the information security controls, policies, and processes and provide recommendations for improvement.

II. Qualifications

The audit will be led by Shawn McGraw, a CISSP Certified industry professional who has been working in the cyber security profession for over 30 years. Shawn is a former NSA veteran responsible for cyber defense at the national level and was later responsible for establishing the New Jersey Division of Gaming Enforcement's cyber security posture prior to and following the launch of Internet casino gaming in 2013. He was also a Navy Reserve Chief, responsible for conducting CISSP training for the US Navy. More recently, Shawn conducted vulnerability assessments on behalf of Siemens in industries that included Rail, Healthcare, and Energy.

Assisting Shawn McGraw will be Senior Auditor, Matthew Krince and Compliance Auditor, Abby Dawson.

Matt Krince has over 15 years of auditing experience in the Banking and Gaming industries and currently specializes in sportsbook and AML compliance audits. He has previously led SSAE18 System and Organization Controls (SOC I) audit teams, where he was involved with control objectives, walkthrough testing, conclusion assessments and report issuance. Further, as part of the SOC I audits, Matt's team tested to ensure the company's network, applications, and data center were restricted to authorized and appropriate users, and that such users were restricted to performing authorized and appropriate actions. He also determined if back-up and recovery procedures were available to preserve the integrity of programs and data files.

Abby Dawson graduated from East Stroudsburg University with a bachelor's degree in education and a Specialized Diploma in Accounting. Abby was formerly an Accounting Consultant and Researcher and is also a CPA candidate. Abby is part of the Audit team and sets up testing templates, tests evidence received, and documents the results.

III. Locations Included in Scope

To be determined.

IV. Objectives

The main objectives of the ISMS audit are as follows:

1. Assess the implementation and effectiveness of the organization's ISMS in accordance with relevant industry standards, best practices, and regulatory requirements.
2. Review the documentation, procedures, and records related to the ISMS and verify their completeness, accuracy, and adherence to the defined security policies and standards.
3. Evaluate the organization's incident response and management capabilities, including the detection, response, and recovery processes for security incidents.
4. Assess the awareness and training programs related to information security and evaluate the level of understanding and compliance among employees.
5. Provide recommendations for improvement, prioritizing actions based on risk and potential impact, to enhance the effectiveness and maturity of the organization's ISMS.

V. Scope:

The ISMS audit will cover the following areas:

1. **Vulnerability Assessment:** An internal and external assessment of Client's sports wagering platform, kiosks, internal, external, and wireless networks will be conducted with the intent of identifying vulnerabilities of all devices, the sports wagering systems, and applications transferring, storing, and/or processing sensitive information connected to or present on the networks. Sensitive data shall include PII and wagering data.

The vulnerability assessment will be conducted remotely and will involve the installation of proprietary software used to evaluate the network, system settings, security controls, and network traffic.
2. **Penetration Test:** A penetration test will be used to validate the vulnerability assessment findings. The penetration test will include findings relative to all digital platforms, mobile applications, and internal, external, and wireless networks to confirm the extent to which devices, the sports wagering systems, and applications are susceptible to compromise.
3. **Firewall Settings:** Firewall rules will be evaluated in conjunction with the vulnerability and penetration test to verify the operating condition of the firewall and the effectiveness of its security configuration and rule sets.
4. **Technical Security Control Assessment:** Contractor will use a risk based approach to test the design of the client's technical security controls against the provisions adopted in Appendix B of GLI-33 and chapter 20:18:35.01 as detailed in the body of this proposal.
5. **Third Party Services:** The integrity of all third party integrations including information security services, cloud services, payment services, financial institutions, payment processors, location services, and any other services that are used in the conduct of sports will be included as part of the vulnerability assessment in accordance with the terms and conditions of the third party provider.

VI. ISMS Audit Detail

Vulnerability Assessment

The purpose of this vulnerability assessment is to identify and evaluate potential security vulnerabilities within the target system or network. The assessment will be conducted to analyze the current security posture, identify weaknesses, and provide recommendations for mitigating risks. The assessment will cover both external and internal aspects of the system/network and will be carried out in a systematic and comprehensive manner.

The main objectives of this vulnerability assessment are as follows:

1. Identify and assess potential vulnerabilities in the target system/network.
2. Evaluate the severity and potential impact of identified vulnerabilities.
3. Provide recommendations and strategies for mitigating identified risks.
4. Enhance the overall security posture of the target system/network.

The vulnerability assessment will cover the following areas:

1. External network perimeter: Assessing vulnerabilities in firewalls, routers, and other network infrastructure.
2. Internal network: Evaluating vulnerabilities in servers, workstations, and internal network devices.
3. Web applications: Identifying vulnerabilities in web applications, including input validation issues, injection attacks, cross-site scripting (XSS), etc.
4. Wireless network: Assessing vulnerabilities in wireless network configurations and security controls.
5. Physical security: Reviewing physical access controls and security measures.
6. Policy and procedures: Evaluating security policies and procedures for adequacy and compliance.

The methodology for this vulnerability assessment is as follows:

1. Information Gathering: Collecting relevant information about the target system/network. This includes the use of mapping software tools used to map out our client's network to recognize all the devices including servers, routers, switches, mobile devices, etc., on their network(s).
2. Vulnerability Scanning: Conducting automated scans using industry-standard and customized vulnerability scanning tools. Scans will be used to identify active services, open ports, and running applications on the client's system including web servers, DNS servers, and other common applications systems and devices, to find vulnerabilities that may exist based on the attributes of the known services and applications.
3. Manual Testing: Performing manual tests to identify vulnerabilities that may not be detected by automated tools.
4. Vulnerability Analysis: Assessing the severity and potential impact of identified vulnerabilities.
5. Risk Assessment: Determining the level of risk associated with each identified vulnerability.
6. Reporting: Documenting the findings, including vulnerabilities, risk levels, and recommended remediation steps.

Penetration Test

The purpose of the penetration test is to assess the security of the target system or network by simulating real-world attacks and attempting to exploit vulnerabilities. The test will be conducted to validate weaknesses identified during the vulnerability assessment. The penetration test will encompass a comprehensive evaluation of the system/network from an attacker's perspective.

The main objectives of this penetration test are as follows:

1. Identify vulnerabilities and potential attack vectors in the target system/network.

2. Exploit identified vulnerabilities to assess the impact and potential consequences.
3. Evaluate the effectiveness of existing security controls and defenses.
4. Provide actionable recommendations for remediation and strengthening of security measures.

The penetration test will cover the following areas:

1. External Network Perimeter: Assessing the security of internet-facing devices, including firewalls, routers, and servers.
2. Internal Network: Evaluating the security controls within the internal network and systems.
3. Web Applications: Conducting targeted attacks against web applications to identify vulnerabilities such as SQL injection, cross-site scripting (XSS), etc.
4. Wireless Network: Assessing the security of wireless network configurations and encryption protocols.
5. Social Engineering: Conducting simulated social engineering attacks to assess employee awareness and vulnerability.
6. Physical Security: Reviewing physical access controls and the potential for unauthorized physical access.

The methodology for the penetration test is as follows:

1. Reconnaissance: Evaluating attack vectors identified through the vulnerability assessment
2. Exploitation: Attempting to exploit identified vulnerabilities to gain unauthorized access or escalate privileges.
3. Post-Exploitation: Assessing the extent of compromised systems and the potential impact of a successful attack.
4. Reporting: Documenting the findings, including identified vulnerabilities, exploited systems, and recommended remediation steps.

Firewall Settings

The purpose of this firewall settings review is to assess the configuration and effectiveness of the firewall rules in place within the target system or network. The review will focus on evaluating the firewall settings, verifying if the rules are properly applied, and ensuring they align with best practices and security requirements. The assessment will aim to identify any misconfigurations, gaps, or vulnerabilities in the firewall implementation and provide recommendations for improvement.

The main objectives of this firewall settings review are as follows:

1. Evaluate the configuration and organization of firewall rules.
2. Verify if the firewall rules are properly applied and enforce the intended security policies.
3. Identify any misconfigurations, gaps, or vulnerabilities in the firewall settings.
4. Provide recommendations for enhancing the effectiveness and security of the firewall implementation.

The firewall settings review will encompass the following areas:

1. Firewall Configuration Assessment: Evaluating the overall configuration of the firewall(s), including rule sets, access control lists, and logging settings.
2. Rule Analysis: Reviewing individual firewall rules to assess their purpose, appropriateness, and potential impact on the security posture.
3. Rule Organization and Prioritization: Evaluating the arrangement and order of firewall rules to ensure proper execution and effectiveness.
4. Rule Testing: Conducting tests to verify the enforcement and accuracy of firewall rules, ensuring they function as intended.
5. Compliance Assessment: Checking the firewall settings against industry best practices, security standards, and regulatory requirements.

The methodology for the firewall settings review is as follows:

1. Information Gathering: Collecting relevant information about the target system/network, firewall configuration, and security policies.
2. Firewall Rule Analysis: Reviewing and analyzing the existing firewall rules to assess their purpose, accuracy, and effectiveness.
3. Rule Testing: Conducting tests to verify the enforcement and accuracy of firewall rules, ensuring they function as intended.
4. Misconfiguration Identification: Identifying any misconfigurations, gaps, or vulnerabilities in the firewall settings.
5. Reporting: Documenting the findings, including identified issues, recommendations, and suggested remediation steps.

Technical Control Assessment

OOO will evaluate the client's documented security controls prepared to address the requirements of the SDCG regulations. On site testing will be coordinated with the client and with approval from the SDCG where appropriate and if necessary. OOO will use a risk based approach to test the design of the client's technical security controls against the following provisions adopted in Appendix B of GLI-33:

B.2 System Operation and Security

B.3 Backup and Recovery

B.4 Communications

B.5 Third-Party Service Providers

B.6 Technical Controls

B.7 Remote Access and Firewalls

B.8 Change Management

B.9 Periodic Security Testing

Additionally, OOO will test the design of the client's technical security controls against the following provisions from chapter 20:18:35.01:

20:18:35.01:02. Technical Standards and Internal Controls.

20:18:35.01:03. Certification testing and Change Management.

20:18:35.01:04. Server Location and Physical Security

20:18:35.01:05. Cloud-base Hosting

20:18:35.01:08. Remediation of Prior Audit Findings

20:18:35.01:09. Network Security and Traffic

20:18:35.01:12. Test accounts

Third Party Services

OOB will evaluate the security posture of the connections to third-party interfaces and APIs integrated within the target system or network. The assessment will focus on identifying vulnerabilities, weaknesses, and potential risks associated with these connections, ensuring the integrity, confidentiality, and availability of data exchanged with external entities. The assessment will encompass a comprehensive evaluation of the security controls and configurations related to third-party interfaces and APIs.

The main objectives of this third-party interface and API review are as follows:

1. Identify vulnerabilities and potential security gaps in the connections to third-party interfaces and APIs.
2. Assess the effectiveness of security controls implemented for securing these connections.
3. Evaluate the compliance of the connections with industry best practices and relevant standards.
4. Provide actionable recommendations for enhancing the security of the connections and mitigating identified risks.

The assessment of third-party interface and API review will encompass the following areas:

1. Identification of Connected Interfaces and APIs: Identifying and documenting all third-party interfaces and APIs integrated within the target system/network.
2. Vulnerability Scanning: Conducting automated vulnerability scans on the connections to identify potential weaknesses, misconfigurations, or vulnerabilities.
3. Security Configuration Assessment: Assessing the security configurations, authentication mechanisms, encryption protocols, and access controls associated with the connections.
4. API Testing: Conducting specific tests to evaluate the security of the APIs, including input validation, authorization, and data handling.
5. Security Compliance Evaluation: Assessing the compliance of the connections with relevant standards, such as OWASP API Security Top 10 or industry-specific regulations.
6. Risk Analysis: Analyzing the identified vulnerabilities, weaknesses, and risks associated with the connections and their potential impact. g. Reporting: Documenting the findings, including identified vulnerabilities, risks, and recommended remediation steps.

The methodology for the assessment of third-party interface and API review is as follows:

1. Information Gathering: Collecting information about the third-party interfaces and APIs, including technical documentation, configuration details, and connectivity specifications.
2. Vulnerability Scanning: Conducting automated vulnerability scans to identify potential weaknesses and vulnerabilities in the connections.
3. Security Configuration Assessment: Reviewing the security configurations, authentication mechanisms, encryption protocols, and access controls associated with the connections.
4. API Testing: Performing targeted tests on the APIs to assess their security posture and adherence to best practices.
5. Risk Analysis: Analyzing the identified vulnerabilities, weaknesses, and risks to determine their severity and potential impact.
6. Reporting: Documenting the assessment findings, including identified vulnerabilities, risks, and recommended remediation steps.

VII. Confidentiality and Data Protection

OOC recognizes the critical importance of safeguarding the confidentiality and integrity of client data throughout the assessment process. We will ensure that the third-party services we engage with adhere to strict data protection measures, including the signing of confidentiality agreements and compliance with relevant privacy regulations. We will take reasonable steps to protect sensitive information and limit access to authorized personnel only.

VIII. Deliverables

The following deliverables will be provided upon completion of the vulnerability assessment:

1. Comprehensive Report: OOC will provide a comprehensive report detailing the findings, including identified vulnerabilities, and recommended remediation steps for each section of the review as follows:
 - Vulnerability Assessment Report
 - Penetration Test Report
 - Firewall Settings Report
 - Technical Security Control Assessment Report
 - Third Party Services Report
2. Executive Summary: OOC will provide A summarized version of the assessment report, highlighting the key findings and recommendations for management.
3. Remediation Plan: OOC will provide a detailed plan outlining the recommended steps for addressing the identified vulnerabilities and mitigating the associated risks.

IX. Timeline and Milestones

The timeline for the ISMS will be established by the client audit to comply with the rules of the SDCG.

X. Assumptions and Constraints

The successful completion of the ISMS audit is dependent on the following assumptions and constraints:

1. The client will assign a point of contact to facilitate communication and coordination throughout the assessment Cooperation and support from key stakeholders and personnel throughout the audit process.
2. The client will provide the necessary access credentials, permissions, documents, and resources required to perform the vulnerability assessment.
3. OOC will comply with applicable laws, regulations, contractual agreements, and organizational policies during the audit.
4. OOC will adhere to the agreed-upon confidentiality and non-disclosure agreements to protect the client's sensitive information.
5. The assessment will be conducted during agreed-upon maintenance windows or off-peak hours to minimize disruption to the normal operations of the target system/network.

XI. Assumptions and Constraints

The ISMS audit will be considered successfully completed when the following criteria are met:

1. The audit plan and schedule are approved by the organization.
2. The audit is conducted in accordance with the agreed-upon scope and methodology.
3. A corrective action plan is provided, addressing the identified gaps and vulnerabilities.
4. The audit report and associated deliverables are submitted to the South Dakota Commission on Gaming.

XII. Confidentiality:

All information obtained during the ISMS audit will be treated as confidential and will only be shared with authorized personnel on a need-to-know basis. The auditor and any personnel involved in the audit will sign non-disclosure agreements (NDAs) to ensure the confidentiality of the organization's information.

XIII. Payment Terms:

Payment terms and conditions will be in accordance with a Master Service Agreement and pricing will be based upon this statement of work.

Our Services Overview



iGaming
Sportbetting
Landbased
iLottery

Simplifying the Future of Compliance

Company Overview

Odds On Compliance is a leading global provider of compliance, audit and assurance, technology advisory, risk advisory services, on a global integrated basis, specializing in Sportsbetting, iGaming, iLottery and much more.

Combining our international capabilities and local market knowledge with an extensive range of skills and industry expertise, we are able to provide a one-stop shop for all regulatory, technical compliance, audit, technology and training needs.

Founded in 2021, initially serving U.S., Canadian and LatAM markets, Odds On recently expanded its footprint to Europe to become the Global market leader in Gaming Compliance. Our team of experienced professionals are able to provide a wide range of services to its international clients and offers special expertise in all aspects of iGaming, Sportsbetting, auditing and technology, who are well-trained individuals with integrity and commitment to providing an excellent service tailored to meet all of a company's requirements.

Outline of Our 360° Services

Delivering quality and excellence in everything we do

OOC Strategic Team

Deliver strategic guidance on compliance initiatives and regulator interactions

OOC Launch Readiness & Technical Team

Preparation of Internal Controls, Policy, Technical Compliance, Revenue Reporting, Jurisdictional GAP Analysis and Quality Assurance Testing.

OOC Policy Team

Assist with drafting, reviewing necessary documentation pre & post launch

OOC Licensing Team

Support existing internal and external licensing assets where necessary

OOC Project Management

Deliver macro-level project management

OOC Research Team

Perform day-to-day research to support all levels of business

OOC Audit Team

Perform and advise on regulatorily mandated audits and best-practices audits such as AML/BSA Compliance, Operational Compliance

OOC Fraud Team

Perform fraud and chargeback reviews to limit exposure

Adopting smarter ways of working to create greater value for your business.

Instilling trust and confidence

How do you navigate the ever-changing world of Gaming? Who can you trust to provide sound judgments and deeper value in evaluating your Compliance obligations? How can you gain confidence around an ever-changing range of gaming regulations and obligations?

Solution 1

We understand one of the most valuable assets in the gaming industry today is trust. In an industry marked by constant change and evolving regulation, instilling trust and confidence across regulated markets is not only important—it is vital. At Odds On we build trust and confidence by continually pushing forward.

Solution 2

We are deploying breakthrough technologies and fresh approaches to provide greater value and deeper insights. We listen first, forging the relationships that produce meaningful solutions.

Solution 3

We identify and assess risk and impact based on business processes, goals and strategies, helping you make more informed business decisions.

Delivering quality and excellence in everything we do

Our Services in Detail



Licensing

Instilling trust and confidence

The online gaming and sports wagering industry is complex and heavily regulated. Applicable gaming laws require extensive due diligence and the demonstration of “suitability” by applicant entities, certain directors and officers and significant shareholders (typically, direct or indirect beneficial owners of more than 5% of a company’s outstanding equity). Additionally, navigating the distinctions in requirements across jurisdictions can be difficult. Odds On Compliance can manage the entire licensing lifecycle.

Phase 1 – Initial Submissions

- Oversee entirety of application process from drafting to submission
- Multi-jurisdictional application preparation
- Assessment of qualifiers and project planning
- General guidance and best practices for managing licensing process

Step 2 – Management of Post-License Award

- Manage Regulatory risk surrounding ongoing licensing obligations
- Multi-jurisdictional trigger reports
- Manage regulatory notifications and regulator interactions

Step 3 – Renewal Process Management

- Streamlined resubmission process
- Pre-preparation based on most up-to-date information
- Timely notifications and management of renewals

Planning

Define the assessment scope to focus on the regulatory evaluation of the key identified categories.

Testing

Work with our clients to execute testing strategy outlined in phase 1 through the collection of materials and independent review in order to perform assessment of existing processes.

Reporting

Produce an assessment report summarizing the scope, results, client response and agreed upon action plan to the identified gaps.

Remediation

Perform follow up testing to ensure clients' responses and action plans were executed to remediate the gaps identified during the initial assessment.

Audit and Risk Assurance

We drive more consistent audits, supported by a passion for excellence. Throughout the course of every engagement, our aim is to deliver deeper insights, broader perspectives, higher quality, and greater consistency in services.

Separately, through assurance services, we provide added confidence around changing regulations, increasing complexity, and new technologies. To us, an audit is more than an obligation, it's an opportunity to provide insight that can inform your future.



Launch Readiness

Launch Planning and Oversight

Provide insight and planning guidance to meet manageable launch goals. Manage process to launch throughout the entire project timeline.

Controls Drafting and Analysis

Provide oversight to ensure all necessary submissions are met, and compliance and regulatory documentation is complete.

Regulator interactions

Plan and engage directly with regulators and internal team members to work through the entirety of the approval process through launch.

Product and Technical Review and Guidance

Provide guidance to development team regarding technical specifications. Perform product testing and provide insight on product requirements vis-a-vis regulatory mandates.

Strategic Guidance

Helping you navigate your roadmap in the most efficient and effective ways

Part 1 – Market Entry Jurisdictional Review and Analysis

Provide overviews of the regulatory landscape across markets. Evaluate strategic targets for regulatory engagement to maximize opportunity for clients.

Part 2 – Vendor Introduction and Selection

Introduction to vendors required to conduct gaming operations such as surety bond company, CPA, independent test laboratory, integrity monitoring association, geolocation provider, KYC and ID verification providers, and other critically important vendors.

Part 3 – Project Planning

Manage entirety of mapping and building out project plan, including conducting GAP analysis between existing and anticipated jurisdictions to help clients target jurisdictions for expansion. Conduct research on behalf of clients specific to their needs and interest.

Odds On strives to be at the forefront of developments in the world of Gaming. We want our clients to be able to adapt quickly to changes in the industry and by combining our knowledge we can help achieve your goals.

As well as being able to provide customized research on regulatory matters, Odds On is able to provide regular updates and reports on so much more.

Technical Compliance

Incident Consultation

When there is a significant incident that may result in regulatory action, we help operators develop a strategy for working with the regulator.

Gap Reviews

Assisting with understanding the complete complexities of technical specifications on a jurisdiction by jurisdiction basis. Using existing operations as the baseline, Odds On Compliance can assist in understanding the gaps needed to meet regulatory approvals in future jurisdictions under consideration.

Bespoke R + D

Odds On Compliance's Development Team works hand-in-hand with our Technical Team to deliver products tailored to assisting our clients develop compliance efficiencies.

Fraud Prevention and Decetion

We use advanced analytics and machine learning to identify and prevent fraudulent activities such as money laundering, match-fixing and bonus abuse.

Fraud and Payments Risk Assessment

We provide detailed assessments of your existing risk management strategies, procedures, technologies and control documentation and identify areas for improvement..

Risk Managment

After successful risk management assessments, we work with you to develop and implement effective risk management strategies that are tailored to your specific needs.

Compliance

We help assess regulatory obligations in the field of fraud – such as reporting obligations, diligence requirements and training necessitiies. [Page 42 of 91](#)

Fraud & Payments

Post Market Entry – An integrated Compliance Model

Our integrated compliance model simplifies the way clients interact with us, experiences our support and service offerings, leverage our unmatched industry expertise, and realize tangible business value. OddsON provides insight into new opportunities which will give clients the confidence to make informed business decisions with a competitive advantage, through partnering to fully manage your compliance obligations.

Gap Analysis – Understanding the scope between written and unwritten expectations to ascertain compliance of across several markets, highlighting new opportunities, minimizing costs and ensure our clients are fully prepared to operate in each jurisdiction and to protect them from regulatory risk.

- We can assist operators with system features and internal control requirements.
- Support third party selection and integration.
- Offer a broad range of services that can be customized to the specific needs of our clients.

Your Challenges

Businesses are reeling under the pressure of an increasingly complex regulatory environment. What were once issues of non-compliance have become issues of significant risk.

Our Expertise

We deploy a series of tools and technology, such as Playbook by Odds On Compliance to stay current with ever-changing obligations and to explore, monitor, and report on all aspects of compliance. Odds On Compliance can assist with implementation of best practices, Change Control Management, Incident Reporting, AML/Compliance Support, and other General Operational Support.

A Global Solution: We go where you go

The most comprehensive and sophisticated solutions based on your needs around the globe.

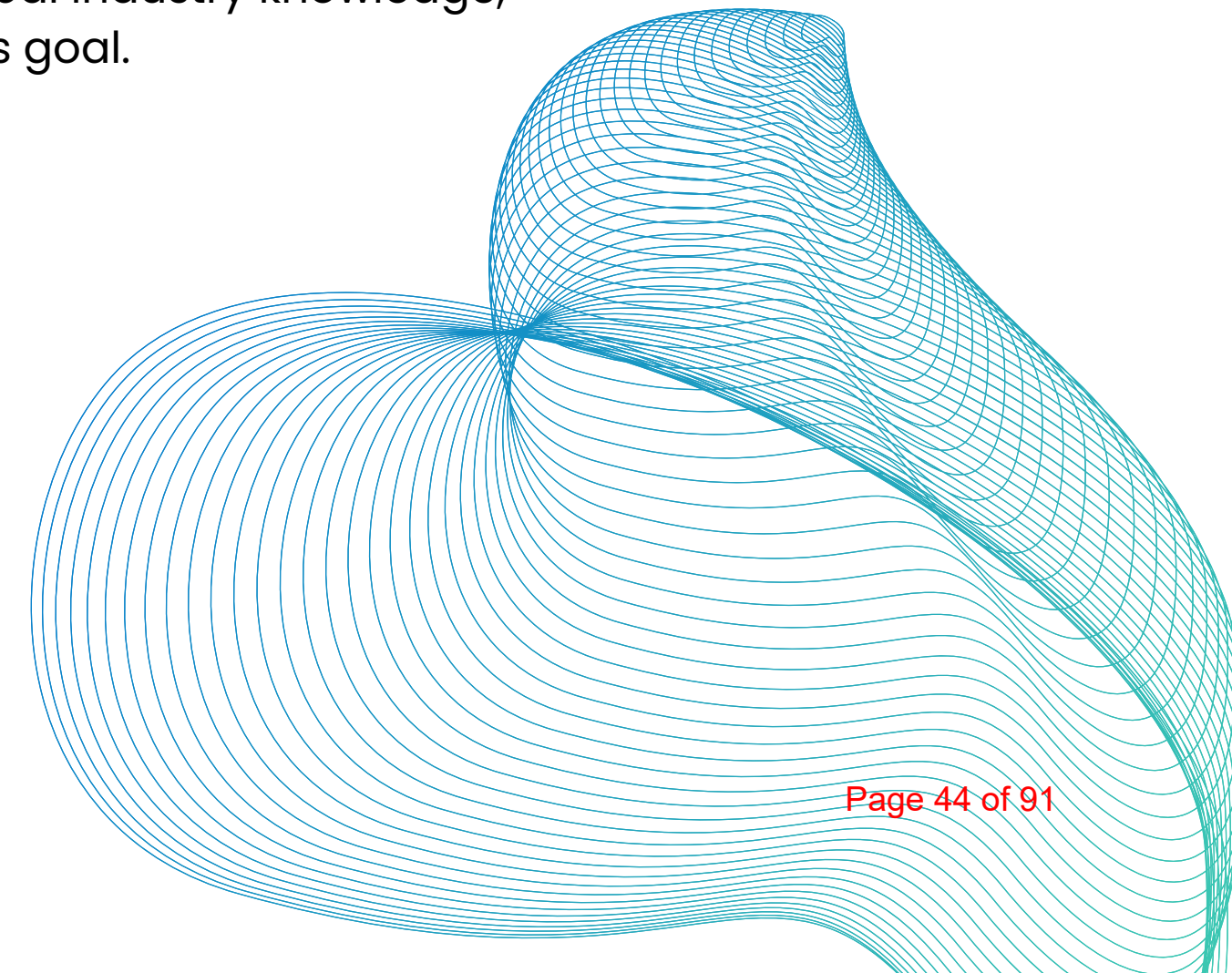


The Odds On Compliance global team leverages learnings from across the industry and across specialty areas. Our collaborative work environment allows us to leverage the right needs for each client, bringing in a bespoke team tailored to our clients' needs.

The Odds On Compliance Aim

Odds On Compliance strives to be at the forefront of developments in the world of Gaming. We want our clients to be able to adapt quickly to changes in the industry.

Leveraging our technology and global industry knowledge, we can help our clients' achieve this goal.





ODDS  ON
COMPLIANCE
MAKE THE RIGHT CALL



Contact Us

Address

7957 N. University Dr., Suite 251, Parkland, FL 33067

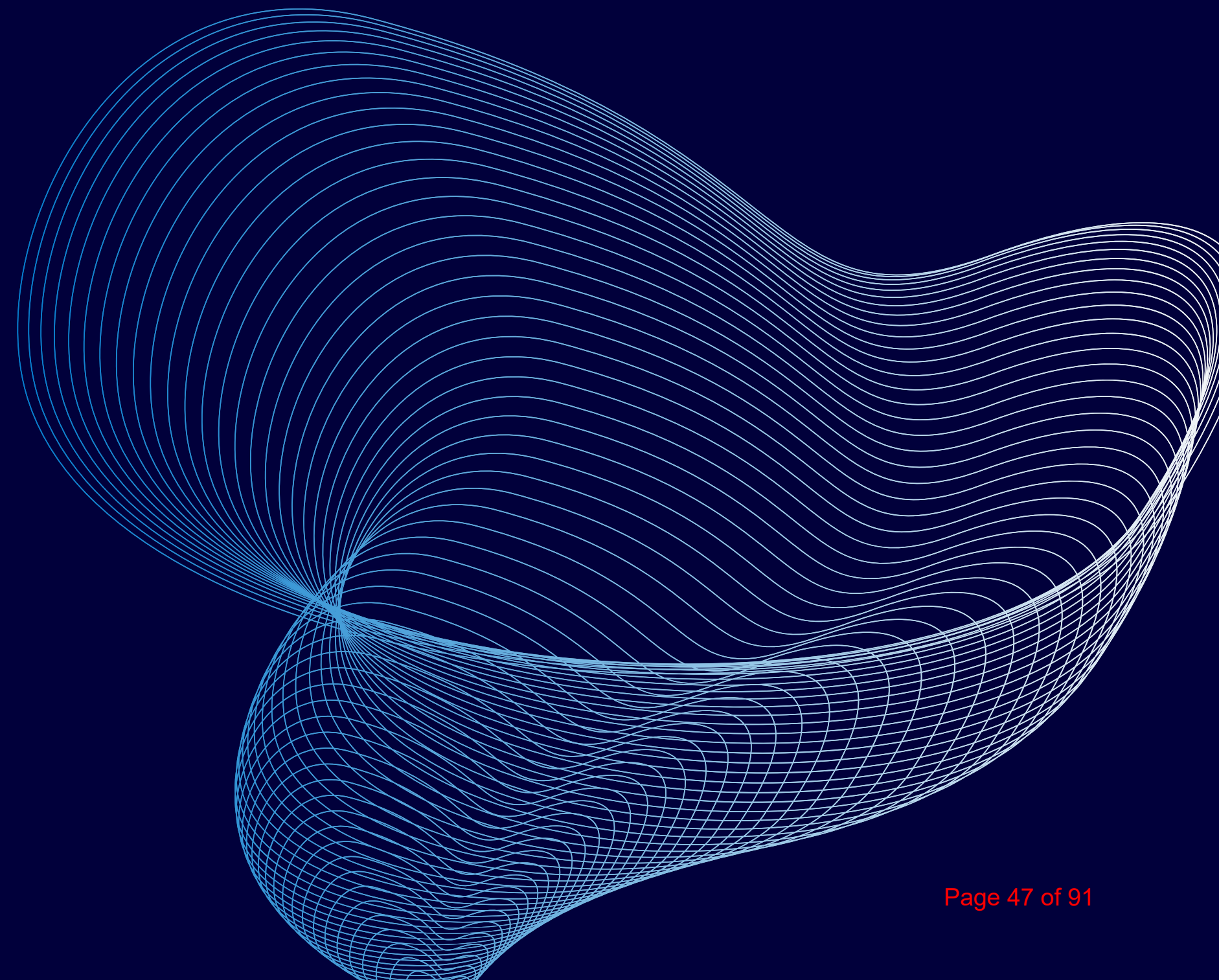
Phone Number

(954) 228-3309

Email Address

info@oddsoncompliance.com

Thank you!



International Information System Security Certification Consortium

The (ISC)² Board of Directors hereby awards

Shawn R McGraw

the credential of

Certified Information Systems Security Professional

having met all of the certification requirements, which include the professional experience prerequisite, adoption of the (ISC)² Code of Ethics, and successful performance on the required competency examination, subject to recertification every three years, this individual is entitled to all of the rights and privileges associated with this designation, as defined in the (ISC)² Bylaws.



Jill Slay - Chairperson



Laurie-Anne Bourdain - Secretary



438209

Certification Number

Apr 1, 2023 - Mar 31, 2026

Certification Cycle

Certified Since: 2014



June 2023

Gaming Integrity and Security Assessment Proposal

State of South Dakota Gaming Commission

Prepared by:



Andy Deinert, CISSP
Network and Security Services Manager
605-995-1765
Andy.Deinert@vantagepnt.com



Lyndon Overweg
Customer Relations Manager
605-995-1777 (office)
Lyndon.Overweg@vantagepnt.com

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Vantage Point Profile

Vantage Point Solutions (VPS) is a premier security, audit, and regulatory consulting firm providing a full range of services focused on the unique challenges faced by your company.



Our industry experts stay updated on the most recent regulatory changes, significant and emerging IT and security risks, and state-of-the-art technology solutions. We are focused on you, the customer, and we deliver a customized approach to meet your specific needs. VPS uniquely offers solutions for security, technology, audit, compliance, and credit services under one roof.

VPS Staff are more than employees
- they are owners.



Employees benefit when clients succeed.
We are dedicated to your success.

Our employee-owners are committed to client satisfaction because client success is their success. As an employee-owned company, our staff is rewarded when our company excels. We hire employees who understand this culture of commitment, leading to a positive work environment and a high satisfaction level for our clients. Want to talk to an owner? Talk to any of us!

We have a full team of experts ready to meet and exceed your needs. We offer a level of experience and expertise that will give you peace of mind throughout the entire project. Team

members help you make smart decisions in the most timely, cost-effective manner possible.

More than anything we care about your success and are available to serve you from the beginning to the end of every project. You will experience a level of customer service that goes above and beyond your expectations. At VPS, we don't stop at good enough. **That's simply your Vantage Point advantage.**





Project Outline

The primary objective of this project is to perform an integrity and security assessment on the client's gaming systems in accordance with the scope outlined in South Dakota Administrative Rule 20:18:35.01.07 with support from provisions adopted in GII-33 Appendix B: Operational Audit for Technical Security Controls¹, while also adhering to generally accepted professional standards.

Scope of Work

Planning and Preparation

Vantage Point Solutions (VPS) will gather all relevant information about the client's gaming systems, including any relevant documents, technical architecture, and system diagrams. This phase will also involve planning and scheduling all necessary tasks and activities.

General Controls and Policy Review

The General Controls and Policy Review provides an independent assessment of your company's IT security posture, policies, and procedures. This effort is intended to provide assurance to company stakeholders that the controls implemented and maintained by the company are adequate as compared to the requirements of GII-33 Appendix B: Operational Audit for Technical Security Controls. This will include, but is not limited to:

- ü System Operation and Security
- ü Backup and Recovery
- ü Communications
- ü Third-Party Service Providers
- ü Technical Controls
- ü Remote Access and Firewalls
- ü Change Management
- ü Periodic Security Testing

External Penetration and Vulnerability Assessment

The VPS External Penetration and Vulnerability Assessment are designed to help protect your company against cyber-attacks from the outside of your network. This assessment will analyze your external, internet facing networks, and identify known and potential vulnerabilities. VPS will also analyze your external network cyber presence and simulate real world attacks against your company. The assessment will include the following tests conducted upon the IP Addresses specified by your company:

- ü Port and Service Scanning
- ü Vulnerability Scanning and Exploitation
- ü DNS and Domain Name Review

¹ 1. Gaming Laboratories International, "GLI-33: Standards for Event Wagering Systems", version 1.1, accessed June 21, 2023, <https://gaminglabs.com/wp-content/uploads/2019/05/GLI-33-Event-Wagering-Systems-v1.1.pdf>.





The VPS External Penetration and Vulnerability Assessment is also a perfect tool to test your company's logging, alerting, and incident response processes. Since the assessment simulates real world attacks, you can see just how your external systems respond to these attacks and become more prepared to defend against and normalize after an actual attack.

As an add-on service, VPS also offers monthly and quarterly External Penetration Assessments. This service provides the company with year-long security testing for a small, incremental cost.

Internal Penetration and Vulnerability Assessment

The VPS Internal Penetration and Vulnerability Assessment is designed to help protect your company against cyber-attacks from the inside of your network. This assessment will also analyze your internal networks and identify known and potential vulnerabilities. VPS will also simulate attacks from inside your company. The assessment will include the following tests conducted upon the internal IP Addresses specified by your company:

- ü Port and Service Scanning
- ü Patch Compliance and Adherence
- ü Vulnerability Scanning and Exploitation
- ü Default, weak, or misconfigurations in network equipment

The VPS Internal Penetration and Vulnerability Assessment is also a perfect tool to test your company's logging, alerting, and incident response processes. VPS assessments are conducted as both authenticated and unauthenticated users to ensure thorough results. Since the assessment simulates real world attacks and discovered vulnerabilities, you can see just how your systems respond to these attacks and become better prepared for an actual attack.





Analysis and Reporting

The VPS audit team will analyze all the data collected during the technical security control assessment vulnerability assessment. The team will then compile a comprehensive audit report conforming to South Dakota Administrative Rule 20:18:35.01.08 which will be submitted to the executive secretary no later than 30 days after the assessment is conducted. The report will include include:

- ü The scope of review
- ü The name and company affiliations of the individual or individuals who conducted the assessment
- ü The date of assessment
- ü The audit findings
- ü Recommended corrective action, if applicable

Note: South Dakota Administrative Rule 20:18:35.01.08 states the integrity and security assessment report is to include “*The licensee’s or sports wagering services provider’s response to the findings and recommended corrective action.*”. VPS cannot guarantee the response of the licensee or sports wagering services provider. VPS will make every effort to ensure that the integrity and security assessment report includes the licensee or sports wagering services provider’s response but if no response is received VPS will ensure that it meets its own obligations and will submit the report sans response to the executive secretary after 25 days of the assessment being conducted.

Presentation of Findings

The VPS audit team will present its findings to the client's management team, discussing the identified vulnerabilities, compliance issues, and recommendations.

Project Timeline

The estimated time frame for this audit is 8-12 weeks, but the actual timeline may vary depending on the complexity of the client's systems and the findings of the audit.

Project Deliverables

- Comprehensive Information Security Audit Report.
- Detailed Action Plan for Remediation of Identified Issues.
- Presentation of Audit Findings and Recommendations submitted to the Executive Secretary.





Assumptions

This project scope of work assumes that the organization being audited has implemented an event wagering system that is subject South Dakota Administrative Rule 20:18:35.01.07 and GLI-33 Appendix B. It is assumed that the organization will provide the necessary access and resources to conduct the audit, including access to relevant systems, documentation, and personnel. Additionally, it is assumed that the organization has implemented appropriate security controls and measures to protect the confidentiality, integrity, and availability of its systems and data.

The audit will be conducted in accordance with industry best practices and standards and will be based on the information and documentation provided by the organization. Any limitations or constraints on the scope of the audit will be communicated to the organization in advance.

Risks

Performing an internal and external vulnerability assessment and penetration test involves certain risks that should be considered. These risks include the possibility of system downtime, data loss, and disruption of business operations. Additionally, the testing process may uncover vulnerabilities or weaknesses in the organization's systems or processes that could be exploited by attackers.

While every effort will be made to minimize these risks, it is important to recognize that the testing process may have some impact on the organization's operations. Therefore, it is recommended that the testing be conducted during a time when the impact on business operations can be minimized and that appropriate measures be taken to ensure the security and integrity of the organization's systems and data throughout the testing process.





Methodology

Approach Strategy

VPS follows a systematic approach to all of its assessments. Following the penetration life cycle according to the scope of the assessment. For further detail about each assessment, see the descriptions outlined above.

Confidential Data Storage/Handling Methods

Vantage Point Solutions stores its client's data from the assessment for the sole purpose of creating its reports. These reports are stored on secure drives and are secured through user permission and encryption. Information is stored for 1 year after the assessment occurs and then disposed of according to NIST standards. This includes removal from the secure site VPS manages to securely transfer the data to and from the client.

Description of Deliverables

Our commitment and dedication to your project will ensure that the timeline is managed effectively and ensure that the quality meets or exceeds your company's expectations. Upon completion of the requested services, a report will be delivered to your organization in a timely manner using language that management and directors can understand. The report will detail the evaluation that was conducted including vulnerabilities found, what risk they hold, and remediation. We will summarize and prioritize the risks found during the scan and provide recommendations for your organization. A follow-up conference call discussing the report with your organization is also included prior to the delivery of the final report.

Compliance and Standards

The audit will be conducted in line with generally accepted professional standards for information security audits, including those from organizations such as GJI and NIST along with scope requirements stated within South Dakota Administrative Rule 20:18:35.01.07.





Project Pricing and Acceptance

Please sign this proposal indicating your acceptance of the services to be performed by Vantage Point. This proposal and pricing will be effective for six months from the date of this proposal. After six months have expired, please contact Vantage Point to review the proposal and ensure pricing is current.

Pricing Summary	Rate
Gaming Integrity and Security Assessment	TBD

Notes:

- (1) *If needed, travel time and expenses are excluded from the above pricing.*
- (2) *If VPS encounters atypical issues out of our control that require additional troubleshooting, this time will be billed on a time and expense basis*
- (3)

Agreed and Accepted:

Client Name

Address

City, State, Zip

Vantage Point Solutions, Inc.

2211 N. Minnesota Street

Mitchell, SD 57301-1056

Name:

Date

Title:

Name: Andy Deinert

Date

Title: Director of Network and Security Services



JUNE 2023

Vantage Point Solutions

Audit Team Certification Holders





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Vantage Point Profile

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VPS Staff are more than employees
- they are owners.

Employees benefit when clients succeed.
We are dedicated to your success.

Our employee-owners are committed to client satisfaction because client success is their success. As an employee-owned company, our staff is rewarded when our company excels. We hire employees who understand this culture of commitment, leading to a positive work environment and a high satisfaction level for our clients. Want to talk to an owner? Talk to any of us!

We have a full team of experts ready to meet and exceed your needs. We offer a level of experience and expertise that will give you peace of mind throughout the entire project. Team

members help you make smart decisions in the most timely, cost-effective manner possible.

More than anything we care about your success and are available to serve you from the beginning to the end of every project. You will experience a level of customer service that goes above and beyond your expectations. At VPS, we don't stop at good enough. **That's simply your Vantage Point advantage.**





Certifications

Information security certifications are globally recognized credentials that validate an individual's expertise in various aspects of information security. These certifications cover a broad range of topics, including security and risk management, asset security, security engineering, communication and network security, identity and access management, security assessment and testing, security operations, software development security, and ethical hacking. By partnering with a team that holds these certifications, you can trust that they have the knowledge and skills necessary to protect your organization from cyber threats and ensure compliance with industry regulations. Whether you need comprehensive security solutions or targeted assessments, our team has the expertise to meet your information security needs.

Vantage Point Solutions Audit Team Certifications

Certified Ethical Hacker (CEH)

The Certified Ethical Hacker (CEH) certification is a globally recognized credential that validates an individual's expertise in identifying vulnerabilities and weaknesses in computer systems and networks. CEH covers a broad range of topics, including footprinting and reconnaissance, scanning networks, enumeration, system hacking, trojans and backdoors, viruses and worms, sniffers, social engineering, denial of service, session hijacking, hacking web servers, web application vulnerabilities, and cryptography. With this certification, our team is equipped to provide our clients with comprehensive security solutions that address all aspects of their information security needs. By partnering with us, you can trust that our team has the knowledge and skills necessary to identify and mitigate potential security threats before they can be exploited by malicious actors.

Certified Information Security Manager (CISM)

The Certified Information Security Manager (CISM) certification is a globally recognized credential that demonstrates an individual's expertise in information security management. CISM validates a certification holders ability to design, implement, and manage information security programs that align with business objectives and manage risks effectively. With this certification, our team is equipped to provide our clients with the highest level of security solutions and ensure the confidentiality, integrity, and availability of their information assets. By partnering with us, you can trust that our team has the knowledge and skills necessary to protect your organization from cyber threats, appropriately measure risk, develop and manage information security strategy, align information security roadmaps with business objectives, and ensure compliance with industry regulations.

Certified Information Systems Security Professional (CISSP)

The Certified Information Systems Security Professional (CISSP) certification is a globally recognized credential that validates an individual's expertise in information security. The CISSP certification covers a broad range of topics, including security and risk management, asset security, security engineering, communication and network security, identity and access management, security assessment and testing, security operations, and software development security. With this certification, our team is equipped to provide our clients with comprehensive security solutions that address all aspects of their information security needs. By partnering with us, you can trust that our team has the knowledge and broad range of skills necessary to protect your organization from cyber threats and ensure compliance with industry regulations.





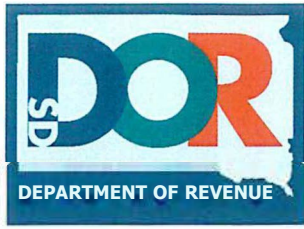
Register of Certification Holders

If you would like to verify our team's certifications online; please use the table of links below the register. You will need the Certification ID and the employee's name to verify.

Employee Name	Certification	Certification ID	Expiry Date
Andy Deinert	Certified Information Systems Security Professional (CISSP)	461885	2/28/2026
Dan Burwitz	Certified Ethical Hacker (CEH)	ECC8956310427	5/8/2025
Josh Tollefson	Certified Information Security Manager (CISM)	232135469	1/31/2027
Josh Tollefson	Certified Information Systems Security Professional (CISSP)	529148	11/30/2025

Organization	Certification	Verification URL
EC-Council	CEH	https://aspen.eccouncil.org/Verify
ISACA	CISM	https://www.isaca.org/credentialing/verify-a-certification
ISC2	CISSP	https://www.isc2.org/MemberVerification#





SOUTH DAKOTA COMMISSION ON GAMING

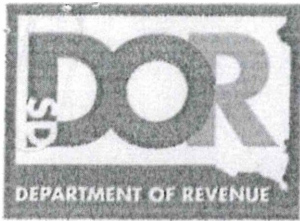
445 E. Capital Avenue • Pierre, SD 57501
(605) 773-6051 • dor.sd.gov/gaming

TO: Commissioners and Doug Abraham
FROM: Susan Christian, Executive Secretary
SUBJECT: Stipulation and Assurance of Voluntary Compliance for INTERNET SPORTS INT'L, LTD-ISS
SDCG Operator License# 12253-SW
Complaint# 23-05-025-JM
DATE: September 12, 2023

On June 14, 2023 an informal consultation per ARSD 20:18:10:03 was held to resolve the violation(s) alleged in the Initial Complaint that was filed by SDCG Sports Wagering Analyst Jared Muchow on May 17, 2023. The complaint was the result of a combination of technical and human error. Licensee's response did not deny or contest the allegations. Licensee has had two prior violations involving prohibited events and one for accepting wagers in excess of \$1,000.00. The prior violations were also the result of technical and human error where inadequate review processes resulted in not identifying compliance violations.

A review was completed of prior fines issued for violations of prohibited events and wager types/amounts by the Commission and based on this review Licensee was fined \$6,000.00. Licensee paid the fine on July 5, 2023.

Staff is recommending that the Commission accept the Stipulation and Assurance of Voluntary Compliance.



SOUTH DAKOTA COMMISSION ON GAMING

445 E. Capitol Avenue • Pierre, SD 57501
(605) 951-9173 • dor.sd.gov/gaming



SOUTH DAKOTA COMMISSION ON GAMING

PLAINTIFF

STIPULATION AND ASSURANCE
OF VOLUNTARY COMPLIANCE

VS.

INTERNET SPORTS INT', LTD-ISS

Complaint # 23-05-025-JM

SDCG LIC #'s 12253-SW

DEFENDANT

RECITALS

A complaint was filed against the Defendant on May 17, 2023, by Jared Muchow, Sports Wagering Analyst, for the South Dakota Commission on Gaming.

The parties wish to resolve the complaint with a Stipulation of Assurance and Voluntary Compliance.

An Informal Consultation was held between the Executive Secretary and the Defendant on June 14, 2023.

I

The complaint alleged that the Defendant engaged in conduct constituting grounds for disciplinary action in that from May 4, 2023, through May 6, 2023, Internet Sports International, Ltd, offered wagers on the Kentucky Derby at sports wagering kiosks in three Deadwood locations.

II

The Defendant answered the complaint on June 1, 2023. The Defendant's answer does not deny the conduct alleged in the complaint.

III

On May 3, 2023 the Defendant made the Kentucky Derby available for wagering on sports wagering kiosks in three Deadwood locations. The Defendant setup the offering as a tournament under Futures. Due to a computer coding error the event was not generated as restricted for South Dakota. On May 4, 2023 wagers were placed on the Kentucky Derby at one of the three locations; wagers continued to be placed until post time on May 6, 2023.

The Defendant did not have adequate internal controls in place for the review of South Dakota prohibited events. The Defendant only reviewed events for South Dakota Colleges and for single wagers placed in excess of one thousand dollars (\$1,000.00).

The Defendant has added a review process for all South Dakota prohibited events to their Internal Control procedures.

This is the Defendant's second sport wagering violation for a prohibited event.

The Executive Secretary imposes a monetary penalty of two thousand dollars (\$2,000.00) for each day wagering was available for a total of six thousand dollars (\$6,000.00).

The penalty is to be paid no later than August 31, 2023.

Please remit penalty payment to:

South Dakota Commission on Gaming
87 Sherman Street
Deadwood, SD 57732

IV

The Defendant recognizes that this Stipulation of Assurance and Voluntary Compliance will be made a public record.

V

The Defendant recognizes that this Stipulation of Assurance and Voluntary Compliance is subject to the approval of the South Dakota Commission on Gaming and that execution of this document does not prohibit the Commission from re-opening this matter for further investigation which could lead to an administrative hearing before the Commission and further disciplinary action against the Defendant.

DATED at Pierre, South Dakota, the 14th day of June 2023 .


Susan Christian, CIA
Executive Secretary
South Dakota Commission on Gaming

INTERNET SPORTS INT', LTD-ISA 

Defendant

By 

Its Vice President



SOUTH DAKOTA COMMISSION ON GAMING

87 Sherman Street • Deadwood, SD 57732
(605) 578-3074 • dor.sd.gov/gaming

South Dakota Commission)	
on Gaming)	
)	
<i>Plaintiff,</i>)	Initial Complaint Filed
)	Pursuant to
Vs.)	ARSD 20:18:10:01
)	
Internet Sports Int'l, LTD-ISI)	
SDCG Lic. # 12253-SW)	Complaint # 23-05-025-JM
)	
)	
<i>Defendant.</i>)	

Generally, Licensee has engaged in conduct constituting grounds for disciplinary action. The conduct complained against is as follows:

On or about May 4, 2023, through May 6, 2023, Internet Sports International, Ltd, offered wagers on the Kentucky Derby, which ran on May 6, 2023. Offering wagering on the Kentucky Derby through the sports wagering platform is a prohibited practice and was not an an approved event listed on the SDCG's sports wagering catalog.

The above listed activity would violate ARSD 20:18:35:04 and 20:18:35:07.

ARSD 20:18:35:04. Authorized and prohibited events and wager types.

Before any licensee or sports wagering services provider may accept sports bets on an event category or sports bets of a particular wager type, the event category or wager type must be approved by the commission.

Source: 48 SDR 14, effective August 22, 2021.

General Authority: SDCL 42-7B-7, 42-7B-11(13).

Law Implemented: SDCL 42-7B-2.1(1), 42-7B-43.

ARSD 20:18:35:07. Prohibited practices. In addition to the events prohibited by SDCL 42-7B-82, a licensee or sports wagering services provider may not accept sports bets on any of the following:

- (a) Horse and dog races;
- (f) Any wagering category not authorized by law or commission rules adopted in compliance with law.

Source: 48 SDR 14, effective August 22, 2021.

General Authority: SDCL 42-7B-7, 42-7B-11(13).

Law Implemented: SDCL 42-7B-2.1(1), 42-7B-43.

Name of complaint	Jared Muchow
Address	87 Sherman St Deadwood, SD 57732 (605) 578-3074

Dated the 17th day of May 2023



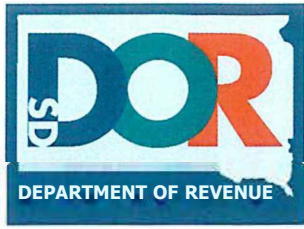
Jared Muchow
Sports Wagering Analyst
South Dakota Commission on Gaming
87 Sherman St
Deadwood, SD 57732
(605) 578-3074

The following witnesses could give testimony about the complaint:

Jared Muchow
87 Sherman Street
Deadwood, SD 57732

Brandon Snyder
87 Sherman St
Deadwood, SD 57732

Collin Haven
7250 Peak Drive Suite 210
Las Vegas, NV 89128



SOUTH DAKOTA COMMISSION ON GAMING

445 E. Capital Avenue • Pierre, SD 57501
(605) 773-6051 • dor.sd.gov/gaming

TO: Commissioners and Doug Abraham
FROM: Susan Christian, Executive Secretary
SUBJECT: Stipulation and Assurance of Voluntary Compliance for Brian Kindsfater
SDCG Operator License# 0081-00-KY
Complaint # 23-05-029-JM
DATE: September 12, 2023

On June 23, 2023 an informal consultation per ARSD 20:18:10:03 was held to resolve the violation(s) alleged in the Initial Complaint that was filed by SDCG Sports Wagering Analyst Jared Muchow on May 17, 2023. The complaint was the result of human error. Licensee did not review the prior day wagering activity as required in the Gold Dust approved internal controls. The omission of the required review procedure allowed wagers to be accepted on a prohibited event and wagering type allowed wagers to be accepted on May 5, 2023 and May 6, 2023. Licensee's response did not deny or contest the allegations.

A review was completed of prior fines issued for violations by key employees for the prohibited events and wager types/amounts by the Commission and based on this review Licensee was fined \$150.00. Licensee paid the fine on July 14, 2023.

Staff is recommending that the Commission accept the Stipulation and Assurance of Voluntary Compliance.



SOUTH DAKOTA COMMISSION ON GAMING

87 Sherman Street • Deadwood, SD 57732
(605) 578-3074 • dor.sd.gov/gaming

SOUTH DAKOTA COMMISSION
ON GAMING,

PLAINTIFF

STIPULATION AND ASSURANCE
OF VOLUNTARY COMPLIANCE

VS.

Brian Kindsfater
SDCG Lic. # 0081-00-KY

Complaint # 23-05-029-JM

DEFENDANT

RECITALS

Complaints were filed against the Defendant on May 17, 2023 by, Jared Muchow, Sports Wagering Analyst for the South Dakota Commission on Gaming.

The parties wish to resolve the complaint with a Stipulation of Assurance and Voluntary Compliance.

An Informal Consultation was held between the Executive Secretary and the Defendant on June 23, 2023.

I

The complaint filed on or about May 17, 2023 alleged that the Defendant engaged in conduct constituting grounds for disciplinary action in that the Defendant allowed wagers to be accepted on a prohibited event.

II

The Defendant answered the complaint on or about May 26, 2023. The Defendants answer does not deny the conduct alleged in the complaint.

III

On or about May 4, 2023, through May 6, 2023, Brian Kindsfater, acting as the sports wagering manager for the Gold Dust/777 sportsbook, allowed wagers on the Kentucky Derby, which ran on May 6, 2023. The SD Commission on Gaming defines a sports wagering manager as a key employee of a licensed operator who is responsible for all operations of the Sportsbook Department. Supervises over the Sportsbook Supervisors in regard to their sportsbook duties. Works daily with ISI to ensure the kiosks have the approved SDCOG catalog of legalized betting options available to our customers. Reviews daily sports wagering reports of the prior day's activity to ensure compliance.

Mr. Kindsfater did not perform his duties as required, which resulted in prohibited wagers taking place.

The Executive Secretary imposes a monetary penalty of \$150.00. The penalty is to be paid no later than August 31, 2023.

Please remit penalty payment to:

South Dakota Commission on Gaming
87 Sherman Street
Deadwood, SD 57732

IV


The Defendant recognizes that this Stipulation of Assurance and Voluntary Compliance will be made a public record.

V

The Defendant recognizes that this Stipulation of Assurance and Voluntary Compliance is subject to the approval of the South Dakota Commission on Gaming and that execution of this document does not prohibit the Commission from re-opening this matter for further investigation which could lead to an administrative hearing before the Commission and further disciplinary action against the Defendant.

DATED at Deadwood, South Dakota, the 23rd day of June 2022 .


Susan Christian, CIA
Executive Secretary
South Dakota Commission on Gaming


Brian Kindsfater
Defendant



SOUTH DAKOTA COMMISSION ON GAMING

87 Sherman Street • Deadwood, SD 57732
(605) 578-3074 • dor.sd.gov/gaming

South Dakota Commission)	
on Gaming)	
)	
Plaintiff,)	Initial Complaint Filed
)	Pursuant to
Vs.)	ARSD 20:18:10:01
)	
Brian Kindsfater)	
SDCG Lic. # 0081-00-KY)	Complaint # 23-05-029-JM
)	
)	
)	
Defendant.)	

Generally, Licensee has engaged in conduct constituting grounds for disciplinary action. The conduct complained against is as follows:

On or about May 4, 2023, through May 6, 2023, Brian Kindsfater, acting as the sports wagering manager for the Gold Dust/777 sportsbook, allowed prohibited wagers on the Kentucky Derby, which ran on May 6, 2023. The SD Commission on Gaming defines a sports wagering manager as a key employee of a licensed operator who is responsible for the operation of sports wagering and final approval of all odds established on any wager made. Per the Gold Dust's approved internal controls, Mr. Kindsfater did not perform his duties as required, which resulted in prohibited wagers taking place.

The above listed activity would violate ARSD 20:18:35:02, 20:18:35:04, and 20:18:35:07.

ARSD 20:18:35:02. Internal control procedures.

Each licensee and sports wagering services provider and their employees shall be responsible for complying with all approved internal controls.

**Sports Wagering Manager Responsible for all operations of the Sportsbook Department. Supervises over the Sportsbook Supervisors in regard to their sportsbook duties. Works daily with ISI to ensure the kiosks have the approved SDCOG catalog of legalized betting options available to our customers. Reviews daily sports wagering reports of the prior day's activity to ensure compliance.*

Source: 48 SDR 14, effective August 22, 2021.

General Authority: SDCL 42-7B-7, 42-7B-11(13).

Law Implemented: SDCL 42-7B-2.1(1), 42-7B-43.

ARSD 20:18:35:04. Authorized and prohibited events and wager types.

Before any licensee or sports wagering services provider may accept sports bets on an event category or sports bets of a particular wager type, the event category or wager type must be approved by the commission.

Source: 48 SDR 14, effective August 22, 2021.

General Authority: SDCL 42-7B-7, 42-7B-11(13).

Law Implemented: SDCL 42-7B-2.1(1), 42-7B-43.

ARSD 20:18:35:07. Prohibited practices. In addition to the events prohibited by SDCL 42-7B-82, a licensee or sports wagering services provider may not accept sports bets on any of the following:

- (a) Horse and dog races;
- (f) Any wagering category not authorized by law or commission rules adopted in compliance with law.

Source: 48 SDR 14, effective August 22, 2021.

General Authority: SDCL 42-7B-7, 42-7B-11(13).

Law Implemented: SDCL 42-7B-2.1(1), 42-7B-43.

Name of complaint Jared Muchow
Address 87 Sherman St
 Deadwood, SD 57732
 (605) 578-3074

Dated the 17th day of May 2023



Jared Muchow
Sports Wagering Analyst
South Dakota Commission on Gaming
87 Sherman St
Deadwood, SD 57732
(605) 578-3074

The following witnesses could give testimony about the complaint:

Jared Muchow
87 Sherman Street
Deadwood, SD 57732

Brandon Snyder
87 Sherman St
Deadwood, SD 57732



SOUTH DAKOTA COMMISSION ON GAMING

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South Dakota Commission on Gaming
licensing for the September 12, 2023

Key License Approvals

Daniel Schrementi
Heather Scheibenstock
Brandon Maser
Kristy Jo
Virginia Shanks
Heather Rollo

Dawn Quaschnick
Dylan Cole
Hamish McLennan
Secil Watson
James Odell
Preston Haynes

Andrew Archibald
David Farahi
Timothy Throsby
Paul Finch Jr.
Antonia Korsanos
Shelley Swanson

2023 Key License Renewals

Jim Vinson

Business License Renewal

Tim & Monica Conrad - Operators license 0108-OP, which is unassigned at this time.

Deadwood Miners - Retail license 12569-RT, which is unassigned at this time.



SOUTH DAKOTA COMMISSION ON GAMING

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August 11, 2023

MEMORANDUM

DATE: 08/03/2023
TO: South Dakota Commission on Gaming
FROM: Brandon Snyder
SUBJECT: Daniel Schrementi/12615-KY

Name of Gaming Business associated with:

The applicant is seeking licensure because he is the current President of Gaming for Incredible Technologies, Inc. Applicant has worked for Incredible Technologies since 2004, serving as a marketing associate, marketing manager/director, vice president of gaming marketing, and vice president of gaming sales and marketing.

Incredible Technologies, Inc. is licensed as a manufacturer in South Dakota and has been since 2018.

Past Employment:

Applicant has worked as a service clerk for Jewel-Osco. Applicant was the ad production manager for The Daily Vidette. Applicant worked as an Advertising/Community Relations Intern for the Chicago White Sox.

Concerns: None

Recommendations: As a result of this background investigation, it is recommended that Daniel Schrementi be approved as a Key Licensee.



SOUTH DAKOTA COMMISSION ON GAMING

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MEMORANDUM

DATE: 08/10/2023
TO: South Dakota Commission on Gaming
FROM: Brandon Snyder
SUBJECT: Dawn Marie Quaschnick
LIC. #: 13289-23-KY

The applicant began working for The Lodge at Deadwood in 2009. She started as a Players Club Attendant and has been a Slot Technician for the last 3 years. Applicant has had a support license since 2002 with no derogatory action taken against her license.

Concerns: None

Recommendation: Approval



SOUTH DAKOTA COMMISSION ON GAMING

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August 3, 2023

MEMORANDUM

DATE: 08/03/2023
TO: South Dakota Commission on Gaming
FROM: Brandon Snyder
SUBJECT: Andrew Archibald/12882-KY

Name of Gaming Business associated with:

The applicant is seeking licensure because he is the President for United Tote.

United Tote had an associated equipment license from 2022 to 2023. Their license has since expired.

Past Employment:

The applicant has been employed by United Tote and TwinSpires since 2012.

Applicant currently holds gaming and racing licenses in several jurisdictions around North America, currently in good standing. Prior to United Tote/Churchill Downs Inc./ TwinSpires he was employed by Sud-Chemie and GE appliances.

Concerns: None

Recommendations: As a result of this background investigation, it is Recommended that Andrew Archibald be approved as a key license.



SOUTH DAKOTA COMMISSION ON GAMING

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August 3, 2023

MEMORANDUM

DATE: 08/03/2023
TO: South Dakota Commission on Gaming
FROM: Brandon Snyder
SUBJECT: Heather Alice Scheibenstock/13143-23-KY

Name of Gaming Business associated with:

The applicant is seeking licensure because she is a current non-executive director with Ainsworth Game Technology.

Past Employment:

Applicant worked for The Star as a H/D dealer, supervisor, casino business manager, and General Manager of Gaming, for Jupiters Ltd. as a general manger electronic gaming, as Planned Executive Director/Managing Director for Australian Gaming and Entertainment and worked for Bloomberry Resort and hotels as Senior Vice President of Table Games. Applicant was a board member for National Childhood Centre for Grief, a trustee/board member for Southern Metropolitan Cemeteries Trust, a non-executive director for Ainsworth Game Technology Limited. Applicant also worked for Spectrum Gaming Group as Senior Vice President and Consultant.

Concerns: None

Recommendations: As a result of this background investigation, it is Recommended that Heather Scheibenstock be approved as a Key Licensee.



SOUTH DAKOTA COMMISSION ON GAMING

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MEMORANDUM

DATE: 08/03/2023
TO: South Dakota Commission on Gaming
FROM: Brandon Snyder
SUBJECT: Dylan Matthew Cole
LIC. #: 13345-23-KY

The applicant is currently working for Tin Lizzie, Mineral Palace, and the Saloon #10. The applicant has had a support license since 2021, with no derogatory action on his license. He is seeking a key license for future positions.

Concerns: Possible financial issues

Recommendation: Approval



SOUTH DAKOTA COMMISSION ON GAMING

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August 3, 2023

MEMORANDUM

DATE: 08/03/2023
TO: South Dakota Commission on Gaming
FROM: Brandon Snyder
SUBJECT: David Jacques Farahi/12876-KY

Name of Gaming Business associated with:

The applicant is seeking licensure because he is currently a Director on the Board of Directors for PlayAGS, Inc.

PlayAGS, Inc. is a licensed manufacturer in South Dakota and has been since 2016.

Past Employment:

The applicant has worked for Atlantis Casino Resort & Spa as a bellman, dealer, analyst, and other front-line positions. Applicant was the Co-Founder of Wildcat Merchandising. Applicant worked at HSBC Bank as a trainee, private banking graduate, investment banking graduate, and private placement graduate. Applicant was the COO for the Monarch Casino & Resort, Inc. Applicant has also worked as a consultant for the Monarch Casino & Resort and PlayAGS.

Applicant has also served on the Board of Trustees for the Reno Bike Project, the Nevada State FBLA, the Reno Redevelopment Agency, and on the Board of Directors for JEWISHcolorado and Jewish Community Relations Council of Colorado. Applicant was the President of the Colorado Gaming Association and a Board member for Colorado Concern.

Concerns: None

Recommendations: As a result of this background investigation, it is Recommended that David Farahi be approved as a Key Licensee for his position with AGS, LLC.



SOUTH DAKOTA COMMISSION ON GAMING

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MEMORANDUM

DATE: 07/07/2023
TO: South Dakota Commission on Gaming
FROM: Brandon Snyder
SUBJECT: Brandon Leigh Maser
LIC. #: 13240-23-KY

The applicant is currently working for the Deadwood Mountain Grand as a Ticket Writer/Sportsbook Manager. The applicant has been employed there since September 2021 and has had a support license since 2010, with one informal consultation and stipulation on his license. He is seeking a key license for his current position.

Concerns: None

Recommendation: Approval



SOUTH DAKOTA COMMISSION ON GAMING

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July 7, 2023

MEMORANDUM

DATE: 07/07/2023
TO: South Dakota Commission on Gaming
FROM: Brandon Snyder
SUBJECT: Hamish McLennan/12044-KY

Name of Gaming Business associated with:

The applicant is seeking licensure because he is currently a director for Light and Wonder (formerly) Scientific Games Corporation. This position began in 2020.

Light and Wonder (formerly) Scientific Game is currently licensed in South Dakota as a Manufacturer.

Past Employment:

Applicant has served as a Client Service Director/Media Buying Executive for George Patterson from 1985 to 1994, he left for an International Client Service Director position with Bates until 1996. In 1996 he went to work for George Patterson again until 2002 and worked as the Sydney Group Client Director, Managing Director-Melbourne, and National Managing Director. In 2002 he began working for Young & Rubicam as Chairman of the Board of Directors for Australia and New Zealand and was promoted to Global Chairman and CEO until 2011. He served as the Executive Vice President and Chairman of the Board of Directors for News Corporation from 2012 to 2013, Executive Chairman and CEO of Network Ten Holdings from 2013 to 2015, and advisor/consultant to Management for Tiger Pistol Pty Ltd. From 2017 to 2019

Concerns: None

Recommendations: As a result of this background investigation, it is Recommended that Hamish McLennan be approved for a Key License.



SOUTH DAKOTA COMMISSION ON GAMING

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July 7, 2023

MEMORANDUM

DATE: 07/07/2023
TO: South Dakota Commission on Gaming
FROM: Brandon Snyder
SUBJECT: Timothy James Osborne Throsby/12065-KY

Name of Gaming Business associated with:

The applicant is seeking licensure because he is an independent director for Light and Wonder (formerly) Scientific Games Corporation. This position began in 2020.

Light and Wonder (formerly) Scientific Game is currently licensed in South Dakota as a Manufacturer.

Past Employment:

From 1987 to 1992 he served as a manager at Macquarie Group. He left for Credit Suisse as Vice President until 1994. In 1994 he worked as an executive director for Macquarie Group until 1995. In 1995 he served as a managing director for Goldman Sachs until 2002. He went on to serve as a managing director for Lehman Brothers until 2005. From 2005 to 2008 he served as President of Citadel Asian and Japan for Citadel Investment Group. We worked for JP Morgan Chase as Global Head of Equities from 2010 to 2016. From 2017 to 2019 he served as CEO and board member of Barclays Bank Plc.

Concerns: None

Recommendations: As a result of this background investigation, it is Recommended that Timothy Throsby be approved for a key license.



SOUTH DAKOTA COMMISSION ON GAMING

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July 7, 2023

MEMORANDUM

DATE: 06/22/2023
TO: South Dakota Commission on Gaming
FROM: Brandon Snyder
SUBJECT: Kristy Beth Jo/12615-KY

Name of Gaming Business associated with:

The applicant is seeking licensure because she is the current Secretary for Aristocrat Plarium Global Holdings, Aristocrat Investments Holding Company, and Aristocrat Technologies Australia Pty. She has been with Aristocrat Technologies since 2018.

Past Employment:

The applicant worked for Price, Waterhouse, and Coopers Legal as a lawyer from 2005 to 2006. She went on to Allens as a Senior Associate Lawyer from 2006 to 2011. From 2011 to 2012 she was a Senior Associate at Moray & Agnew Newcastle. In 2012 she worked for Newcastle Permanent Building Society Limited as a corporate lawyer until 2017. From 2017 to 2018 she worked for nbn Co Limited as Senior Legal Counsel.

Concerns: None

Recommendations: As a result of this background investigation, it is Recommended that Kristy Beth Jo be approved as a Key Licensee for her position with Aristocrat.



SOUTH DAKOTA COMMISSION ON GAMING

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July 7, 2023

MEMORANDUM

DATE: 06/22/2023
TO: South Dakota Commission on Gaming
FROM: Brandon Snyder
SUBJECT: Secil Watson/12739-KY

Name of Gaming Business associated with:

The applicant is seeking licensure because she is currently on the Board of Directors for Everi Holdings Inc.

Everi Holdings, Inc., is a company that produces slot machines and provides financial equipment and services to casinos. Everi Holdings, Inc. owns Everi Payments, Inc and Everi Games, Inc and they are both licensed in South Dakota. Everi Payments is licensed as an Associated Equipment license and Everi Games is licensed as a Manufacture license.

Past Employment:

The applicant was employed by Wells Fargo Bank from 07/2002 until 03/2021. She served as a Senior Vice President and Executive Vice President. She has served on numerous board of directors.

Concerns: None

Recommendations: As a result of this background investigation, it is Recommended that Secil Watson be approved as a Key/Director with Everi Holdings Inc.



SOUTH DAKOTA COMMISSION ON GAMING

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July 7, 2023

MEMORANDUM

DATE: 06/22/2023
TO: South Dakota Commission on Gaming
FROM: Brandon Snyder
SUBJECT: Paul Wendell Finch Jr./12754-KY

Name of Gaming Business associated with:

The applicant is seeking licensure because he is currently on the Board of Directors for Everi Holdings Inc.

Everi Holdings, Inc., is a company that produces slot machines and provides financial equipment and services to casinos. Everi Holdings, Inc. owns Everi Payments, Inc and Everi Games, Inc and they are both licensed in South Dakota. Everi Payments is licensed as an Associated Equipment license and Everi Games is licensed as a Manufacture license.

Past Employment:

The applicant was most recently employed by Early Warning Services, LLC as the President, and CEO. He was there from 2003 until 2019 when he retired. Prior to that he was as the Executive Vice President of Systems and Operations at EFunds, Inc. from 1990 to 2003.

Concerns: None

Recommendations: As a result of this background investigation, it is Recommended that Paul Finch Jr. be approved as a Key/Director with Everi Holdings Inc.



SOUTH DAKOTA COMMISSION ON GAMING

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July 6, 2023

MEMORANDUM

DATE: 07/06/2023
TO: South Dakota Commission on Gaming
FROM: Brandon Snyder
SUBJECT: Virginia Eileen Shanks/12339-KY

Name of Gaming Business associated with:

The applicant is seeking licensure because she is an independent director for Light and Wonder (formerly) Scientific Games Corporation. This position began in 2021.

Light and Wonder (formerly) Scientific Game is currently licensed in South Dakota as a Manufacturer.

Past Employment:

The applicant served as a Director for Global Gaming Women from 2016 to 2018, a strategic advisor for Penn National gaming from 2018 to 2019, a director for Make-a-Wish of Southern Nevada from 2011 to 2014, a EVP at Pinnacle Entertainment from 2010 to 2018, the Chief Marketing Officer for Multimedia Games from 2008 to 2010. She worked in several Senior VP and VP positions for Harrah's Entertainment from 1983 to 2008.

Concerns: None

Recommendations: As a result of this background investigation, it is Recommended that Virginia Shanks be approved for a key license.



SOUTH DAKOTA COMMISSION ON GAMING

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July 6, 2023

MEMORANDUM

DATE: 07/06/2023
TO: South Dakota Commission on Gaming
FROM: Brandon Snyder
SUBJECT: James Ronald Odell/12027-KY

Name of Gaming Business associated with:

The applicant is seeking licensure because he is currently the Executive Chairman for the Board of Directors for Light and Wonder (formerly) Scientific Games Corporation. This position began in 2020.

Light and Wonder (formerly) Scientific Game is currently licensed in South Dakota as a Manufacturer.

Past Employment:

The applicant was the Chief Executive Officer/ Managing Director for Aristocrat Leisure Limited Australia from 2009 to 2017. From 2003 to 2008 he served as the Managing Director and Global Managing Director for Fosters Group.

Concerns: None

Recommendations: As a result of this background investigation, it is Recommended that James Odell be approved for a Key License.



SOUTH DAKOTA COMMISSION ON GAMING

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July 1, 2023

MEMORANDUM

DATE: 07/01/2023
TO: South Dakota Commission on Gaming
FROM: Brandon Snyder
SUBJECT: Antonia Korsanos/11975-KY

Name of Gaming Business associated with:

The applicant is seeking licensure because she is the current executive vice chairman for Light and Wonder (formerly) Scientific Games Corporation. In 2019 she began consulting for Light and Wonder (formerly) Scientific Games Corporation.

She is also a non-executive director for Crown Resorts Limited, and non-executive director for Crown Melbourne Limited. All these entities are involved in gaming.

Light and Wonder (formerly) Scientific Game is currently licensed in South Dakota as a Manufacturer.

Past Employment:

The applicant served as the General Manager-group finance for Aristocrat Technologies Australia Pty Ltd from 2007-2009. In 2009 she went on to serve as the CFO until 2018. She also served as the company secretary from 2011 to 2017.

Concerns: None

Recommendations: As a result of this background investigation, it is Recommended that Antonia Korsanos be approved for a key license.



SOUTH DAKOTA COMMISSION ON GAMING

87 Sherman Street • Deadwood, SD 57732
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June 22, 2023

MEMORANDUM

DATE: 06/22/2023
TO: South Dakota Commission on Gaming
FROM: Brandon Snyder
SUBJECT: Heather Ann Rollo/13047-KY

Name of Gaming Business associated with:

The applicant is seeking licensure because she is the current Chief Financial Officer and Manager for Interblock USA LC. She is also a director for Interblock Canada Inc., Interblock Asia & Pacific PTY LTD., and Interblock Columbia S.A.S. Columbia.

Interblock is currently licensed in South Dakota as a Manufacturer.

Past Employment:

The applicant worked for Boyd Gaming as an Administrative Assistant in 1994. In 2005 she worked for Progressive Gaming Intl Corp. as the Chief Accounting Officer and later as the Chief Financial Officer. She left in 2007 and began working for Virgin River Casinos, LLC as an advisory member. In 2009 she served as the Chief Accounting Officer and SVP of finance for Ameristar Casinos until 2012. From 2013 to 2014 she worked as a consultant for Bally Technologies. In 2014 she served as the Chief Accounting Officer and SVP of finance for Melco Resorts Services Limited until 2021.

Concerns: None

Recommendations: As a result of this background investigation, it is Recommended that Heather Ann Rollo be approved as a Key/Director with Interblock.



SOUTH DAKOTA COMMISSION ON GAMING

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MEMORANDUM

DATE: 06/14/2023
TO: South Dakota Commission on Gaming
FROM: Brandon Snyder
SUBJECT: Preston Lee Haynes
LIC. #: 13208-23-KY

The applicant is currently working for RIDD pest control as a sales representative in South Carolina. The applicant has had a support license since January 2023, with no derogatory action on his license. He is seeking a key license for future job opportunities.

Concerns: None

Recommendation: Approval



SOUTH DAKOTA COMMISSION ON GAMING

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MEMORANDUM

DATE: 06/16/2023
TO: South Dakota Commission on Gaming
FROM: John Cargill
SUBJECT: Shelley Renee Swanson
LIC. #: 13324-23-KY

The applicant is currently working for Tin Lizzie Casino as a Cashier. The applicant has been employed there since February 2023 and has had a support license since 2020, with no derogatory action on her license. She is seeking a key license for her current position.

Concerns: None

Recommendation: Approval