



Date: 22nd November 2022  
To: Sports Wagering Application Review Commission  
From: Crab Sports Inc.  
Subject: Ownership Criteria

Dear Mr. Chairman and SWARC Committee members,

Crab Sports has greatly enjoyed observing and participating in the creation of the Sports Wagering industry in Maryland, led by the SWARC, since the state legislation was passed in the spring of 2021. This legislation called clearly for the participation of women and minorities in the industry, and it was this intent that led to the founding of Crab Sports. We are proud that, after concerted efforts to raise funds from women and minority investors, our company is over 50% owned by individuals in those groups.

It eventually became clear that the original intent of the legislation to provide direct support to companies such as ours was going to be subject to significant legal challenges, and so we welcomed the introduction of the Personal Net Worth requirement outlined in COMAR 36.11.02.19. While there are numerous creative ways for some of the larger industry participants to satisfy this requirement, we are proud that no such creative structuring was required for Crab Sports. This criteria is fulfilled by one of our founding shareholders who holds over 20% of the equity in the company.

With diversity and a local approach being part of our DNA, we will not stop there and intend to build a truly Maryland company that partners with other local businesses, employs local team members, and enhances the reputation of the sports wagering industry in Maryland.

Thank you for your consideration.



**Mark R. Starr**

*Associate General Counsel & Director of Regulatory Compliance*

December 07, 2022

Sports Wagering Applicant Review Commission  
c/o Maryland Lottery and Gaming Control Agency  
1800 Washington Blvd #330  
Baltimore, MD 21230

**RE: Licensee Ownership Criteria**

Dear Mr. Chairman and Sports Wagering Application Review Committee Members:

Please accept this letter as a summary of how SBOpco, LLC ("SuperBook") satisfies the ownership criteria required COMAR 36.11.02.19. On an issued and outstanding basis, 17.5% of SuperBook's Class B Membership Units are owned by individuals that have a net worth less than \$1,847,000 in accordance with COMAR 36.11.01.02C(10). Mr. Robert Jay Kornegay owns 200,000 Class B Units (10%); Mr. Jeffrey Sherman owns 100,000 Class B Units (5%); and Mr. Johnathan Murray owns 50,000 Class B Units (2.5%). In total, these individuals own a 17.5% equity interest in SuperBook.

Respectfully submitted,

**Mark R. Starr**

[www.SuperBook.com](http://www.SuperBook.com)



## *Canton Gaming LLC*

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Sports Wagering Application Review Commission  
c/o Maryland Lottery and Gaming Control Commission  
[SWARC@mlis.state.md.us](mailto:SWARC@mlis.state.md.us) and [SWARC@taftlaw.com](mailto:SWARC@taftlaw.com)

### ***DELIVERED VIA ELECTRONIC MAIL ONLY***

November 18, 2022

Chairman Brandt, Commission Members, and Staff,

Canton Gaming's retail sports wagering facility applications provide equity ownership opportunities for a diverse mix of entrepreneurs who satisfy the personal net worth requirements under COMAR 36.11.02.19. In addition, §9-1E-15(h)(3) of Maryland's Sports Wagering Law requires SWARC to consider whether an applicant for a Class B sports wagering facility license is located in an Opportunity Zone or Enterprise Zone. Our proposed Canton location satisfies both criteria.

Canton Gaming's proposed sports wagering facility applications in Canton and Towson are in the public interest and will lead to enhanced State revenues for education (achieved through new sports wagering tax revenue) along with new jobs and economic development opportunities in Baltimore City and Baltimore County. We are excited by the opportunity to participate in Maryland's sports betting industry and believe our applications are in the public interest – as set forth in the State's Sports Wagering Law and in COMAR.



Mark Sapperstein  
Canton Gaming, LLC



3027 Riva Road  
Riva, Maryland 21140

December 2, 2022

Attn: SWARC

Dear Commissioners and Staff:

The ownership of Kathe P. Hospitality Services, Inc. DBA "Michael's on the South River", is as follows; Kathe P. Hospitality Services, Inc. was formed as a minority owned business, beginning in 2009 and is a successful wedding and party venue business. With changing times, I decided to apply for a Sports Wagering License and turn the venue into a destination sports wagering bar and restaurant. To comply with COMAR 36.11.02.19, in August I discussed with two of my long-term employees the opportunity to acquire shares in Kathe P. Hospitality. Both accepted and I am delighted to have them join me in the ownership of Kate P. Hospitality.

Both of these employees have supported the business and were principal factors in the running and success of Michael's on the South River. Our all-minority leadership entity is eager to continue the upstanding tradition of strong work ethic and successful small-business enterprises if awarded a Maryland sports wagering license.

Kathe Piera  
President  
Kathe P. Hospitality Services, Inc.

*Kathe P. Hospitality Services, Inc. t/a Michael's on The South River*