

December 2, 2022

Sports Wagering Application Review Commission (SWARC)  
c/o Maryland Lottery and Gaming Control Commission  
1800 Washington Boulevard, Suite 330  
Baltimore, MD 21230

Subject: Supplemental Ownership Criteria Statement from Vital Services Contractors (VSC)

Dear SWARC Members (and Consultants):

VSC is honored to provide this supplement to our Mobile Sports Wagering License application to describe our efforts to comply with both the letter and importantly, the spirit of the Ownership Criteria, as set forth in COMAR 36.11.02.19.

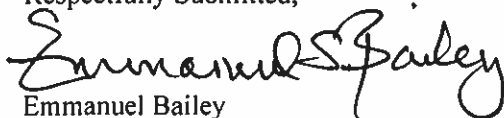
We would be remised, if we did not begin with acknowledging the unprecedented and steadfast efforts taken by the esteemed members of the SWARC under the leadership of Chairman Thomas Brandt, to ensure, under withering pressure, that Maryland's new sports wagering industry fully reflect the socioeconomic diversity of the State and importantly, set the conditions that encourage maximum participation by individuals and small businesses that have been largely excluded from the Sports Wagering industry. VSC, a regionally certified MBE firm, has been in the U.S. Gaming industry since 2010, and we are acutely aware of the fact that this level of legislative focus on inclusive participation is both rare and uncommon.

Therefore, VSC took this mandate seriously and we believe our results reflect that commitment. VSC conducted an exhaustive search of small business and MBE databases, including the Maryland Business Express and the MDOT Directory of Certified Firms. We also met with the CEO of the Bi-County Roundtable to solicit recommendations. Given these outreach efforts, we met with (11) eleven potential indirect and direct equity participants, with a specific focus on identifying individual small business owners, with demonstrated past performance providing industry relevant goods/services that we would be able to incorporate in our actual Sportsbook operations, should we be awarded a Sports Wagering License.

VSC is pleased to have identified and granted a combined 5% indirect equity position to the Shuttle Bus Company and EZRA Technologies, Inc., respectively. Both owners meet the SWARC requirements, as attested to by their signed, notarized statements and by fact of their MDOT and other regional small business certifications. Importantly, both firms have proven expertise in core and support business operations for which we have agreed to utilize, on a direct contract basis, in our Sportsbook operations, should we be successful in acquiring a License. Given this arrangement, we feel strongly that we are advancing the SWARC participation requirements by not only providing individual wealth building opportunities, but long-term small business growth.

In closing, we wish to thank SWARC for providing this opportunity to explain our approach and, importantly, to reaffirm our full commitment and ongoing compliance with the 'Ownership Criteria' provision, as set forth in COMAR 36.11.02.19.

Respectfully Submitted,

A handwritten signature in black ink that reads "Emmanuel S. Bailey". The signature is written in a cursive style with a large, prominent 'E' and 'B'.

Emmanuel Bailey  
Chief Executive Officer

VSC

Submission Date: December 2, 2022

## **OWNERSHIP CRITERIA STATEMENT OF WHITMAN GAMING, INC.**

Whitman Gaming, Inc. meets the ownership criteria found in COMAR 36.11.02.19. The entity is wholly owned and operated by an individual who is both a minority and satisfies the personal net worth requirement. Whitman Gaming, Inc. is proud to be a minority owned company that meets both the letter and spirit of the ownership criteria regulations.