

**DECISION OF THE MARYLAND LOTTERY AND
GAMING CONTROL COMMISSION**

**Application for Sports Wagering Facility License
Riverboat on the Potomac, LLC**

License Applicant No. 2021-SW-16

**Qualification Hearing before
the Maryland Lottery and Gaming Control Commission
December 2, 2021**

On December 2, 2021, the Maryland Lottery and Gaming Control Commission (“Commission”) held a virtual meeting during which it conducted a hearing to determine whether Riverboat on the Potomac, LLC (“Applicant” or “Riverboat on the Potomac”) is qualified for a sports wagering facility license under Maryland’s Sports Wagering Law.

FINDINGS OF FACT

Background Process

1. Sports wagering in Maryland is governed by the Sports Wagering Law, found in State Government Article (“SG”), Title 9, Subtitle 1E, Annotated Code of Maryland, and the regulations of the Maryland Lottery and Gaming Control Commission (“Commission”), found in the Code of Maryland Regulations (“COMAR”) 36.10. The Sports Wagering Law also incorporates the Gaming Law, which governs casino operations in Maryland, found in SG, Title 9, Subtitle 1A, and COMAR 36.03.

2. The Commission is authorized to issue licenses necessary for sports wagering in the State, one of which is a sports wagering facility license. Unless a person holds a valid sports wagering facility license issued by the Commission, the person may not conduct, offer, or operate in-person sports wagering at a location in the State.

3. An applicant for a sports wagering-related license must submit an application to the Commission. Before it can be issued a license, an applicant must meet all applicable qualification requirements in the Sports Wagering Law, and prove to the Commission, by clear and convincing evidence, that it is qualified under SG § 9-1E-07(e), and not disqualified under SG § 9-1E-07(g)(1). The Commission is required to deny the license application of an applicant that does not meet qualification requirements.

4. An applicant must submit to the Commission all information that is necessary for the Commission to determine its qualifications, and those of its principals, its principal entities, and any other necessary qualifiers.

5. Riverboat on the Potomac, LLC submitted a Sports Wagering Facility License Application to the Commission and the Maryland Lottery and Gaming Control Agency (“MLGCA”) conducted an investigation to determine if Riverboat on the Potomac is qualified for a Sports Wagering Facility License.

Qualification Hearing – December 2, 2021

6. Staff of the MLGCA’s Licensing Division provided the Applicant with written notice of the hearing. Maruthi Prasad, Gagandeep Suri, Antonio Jones, and Winston DeLattiboudere were present in the virtual meeting on behalf of the Applicant. In advance of the meeting, John J. Mooney, MLGCA’s Managing Director of Regulatory Oversight, provided the Commission the confidential full investigative report on Riverboat on the Potomac. Mr. Mooney made publicly available Staff’s executive summary of the background investigation, and Staff’s recommendations.

Applicant's Background

7. LVOE, Inc. was incorporated in Maryland on November 30, 2020, and operates under the name Riverboat on the Potomac.

8. Riverboat on the Potomac is a restaurant, off-track betting facility, lottery retailer and liquor store located at 301 Beach Terrace, Colonial Beach, Virginia. The facility is located on a pier in the waters of the Potomac River and is situated within the jurisdiction of Charles County, Maryland.

9. On January 10, 2020, Bodhi Naav, LLC was incorporated in Maryland and functions solely as the holder of all real estate assets of Riverboat on the Potomac. In February, 2021, Bodhi Naav, LLC entered into a teaming agreement with Delmock Technologies, Inc. to pursue a license to operate a sports wagering facility at Riverboat on the Potomac.

10. Delmock Technologies, Inc. is a Maryland corporation formed on October 15, 2002, which mainly provides information technology services to U.S. government agencies and private companies.

11. On May 10, 2021, the parties formed Riverboat on the Potomac, LLC to hold the sports wagering facility license.

12. Riverboat on the Potomac, LLC and PointsBet Maryland, LLC entered into a retail and mobile sports book agreement on June 9, 2021.

13. Delmock Technologies, Inc. established Delmock Entertainment, LLC on August 31, 2021, to hold its share of the sports wagering entity.

Ownership of Applicant

14. LVOE, Inc. is wholly owned by Mr. Maruthi Prasad Veeramarchnani. Bodhi Naav, LLC is owned 67% by Ms. Gagandeep Suri and 33% by Mr. Veeramarchnani.

15. Mr. Winston DeLattiboudere is sole owner of both Delmock Technologies, Inc. and Delmock Entertainment, LLC.

Licensing Inquiry

16. LVOE, Inc., Bodhi Naav, LLC, Delmock Technologies, Inc., and Delmock Entertainment, LLC have all filed Sports Wagering Principal Entity Applications with the MLGCA.

17. Mr. Maruthi Prasad Veeramarchnani, Ms. Gagandeep Suri and Mr. Winston DeLattiboudere have all filed Sports Wagering Principal Employee License Applications with the MLGCA. Mr. Antonio Jones has filed a Sports Wagering Principal Employee License Application as an officer of Delmock Entertainment, LLC.

18. PointsBet Maryland, LLC submitted a Sports Wagering Facility Operator License Application and was found qualified by clear and convincing evidence through application of alternative licensing standards by the Commission.

Discussion of Financial Performance

19. MLGCA performed a detailed analysis of Riverboat on the Potomac's financial performance, which included a detailed analysis of its principal entities through: various financial statements, Dull & Bradstreet, Tax Return, Litigation, and Financial Analysis.

20. Overall, MLGCA had no concerns with licensure of Riverboat on the Potomac, LLC as a Sports Wagering Facility Licensee or with LVOE, Inc.; Bodhi Naav, LLC; Delmock Technologies, Inc.; or Delmock Entertainment, LLC as Sports Wagering Principal Entities.

Results of Background Investigation

21. MLGCA conducted a complete and thorough background investigation as authorized under the Sports Wagering Law by analyzing corporate records and documents,

scrutinizing the business operations, practices, and transactions of Riverboat on the Potomac, LLC, and conducting interviews of key personnel, focusing on required qualification criteria involving integrity and financial stability.

22. MLGCA adhered to well-defined and approved investigative protocols in assembling the factual information incorporated in this report. The results of the investigation for the specific qualification criteria enunciated in SG §§ 9-1A-07(c)(7) and 9-1A-08(d) as applied to a sports wagering license applicant under SG § 9-1E-03(a)(1) and that Riverboat on the Potomac is qualified under SG § 9-1E-07(e), and not disqualified under SG § 9-1E-07(g)(1), are summarized:

a) Financial Stability, Integrity and Responsibility

A comprehensive review was conducted of all of the consolidated financial statements for the last five years. The Applicant satisfied the standards for financial stability, integrity and responsibility in connection with the Sports Wagering Facility License Application.

b) Integrity of financial backers, investors, mortgages, bondholders, and other holders of indebtedness

Based on MLGCA review, there are no material issues involving the known financial backers of the Applicant.

c) Good character, honesty, and integrity

MLGCA found that the Applicant possesses the requisite good character, honesty and integrity. No significant issues surfaced concerning the qualifications of the Applicant. There were no material issues discovered pertaining to the Applicant's record of regulatory compliance or litigation matters.

d) Sufficient business ability and experience

Riverboat on the Potomac, LLC is a restaurant, off-track betting facility, lottery retailer and liquor store. PointsBet Maryland LLC is a newly formed Limited Liability Company for the purpose of operating the “PointsBet” brand sports book in the State of Maryland. PointsBet is currently licensed in Australia and ten U.S. states. The Applicant has entered into a retail and mobile sports book agreement with PointsBet Maryland, LLC. The Applicant clearly possesses the requisite business ability and experience.

e) Potential disqualifying factors

The Applicant is not disqualified from being issued a Sports Wagering Facility License under SG § 9-1E-(g)(1) based on any of the criteria listed in SG § 9-1A-08(d), as applied to a sports wagering license applicant under SG § 9-1E-03(a)(1).

Applicant and Principal Entities

23. The Applicant and its principal entities satisfy the applicable qualification criteria under SG § 9-1A-07(c)(7), and are not disqualified under SG § 9-1A-08(d), as applied to a sports wagering license applicant under SG § 9-1E-03(a)(1).

Sports Wagering Facility License Application

24. The Applicant submitted a completed Sports Wagering Facility License application; an affidavit attesting to the minority and women-owned interests of the applicant; all required fees; and proof of adequate bond.

25. MLGCA Staff is not aware of information that would indicate Riverboat on the Potomac, LLC fails to meet the Commission’s qualification requirements.

26. MLGCA Staff recommends that the Commission determine the Applicant has established that it is qualified, by clear and convincing evidence, for a sports wagering facility license.

CONCLUSIONS OF LAW

1. The Applicant has established by clear and convincing evidence that it is qualified for, and is not disqualified from, a sports wagering facility license.
2. The Applicant remains under an ongoing obligation to comply with all qualification requirements and to notify the Commission if any of the information submitted to the Commission or MLGCA changes.
3. If MLGCA Staff determines that the Applicant or licensee, if licensed, does not meet a Commission standard, the Commission may take enforcement action, up to and including revocation of the license.
4. The Secretary of the Commission will transmit this decision statement to the Sports Wagering Application Review Commission.

REVIEW RIGHTS

A party aggrieved by this final administrative Decision may file a petition for judicial review with the circuit court for the county where any party resides or has a principal place of business within thirty days of the date of this Decision. SG § 10-222; Maryland Rules 7-201 – 7-211.


E. Randolph Marriner, Chair

12-2-21
Date