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# JAMAICA GAMING ASSOCIATION

100 Hope Road, Kingston 06

June 29<sup>th</sup>, 2023

Mrs. Laurie Wiggan  
Director Compliance & Regulatory  
Betting Gaming & Lotteries Commission  
78CEF Hagley Park Road  
Kingston 10, Jamaica

Dear Mrs. Wiggan

**RE: Bond Methodology**

The Gaming Association's response is based upon discussions with and representations from a majority of our members.

The concerns of our members relate to two specific points in the bond methodology in the context of the Gaming industry.

**a. Performance bond.**

Most of the gaming lounges work on a retention of 2% to 4% of their revenue. Our Lounges are not very big and among them, the bigger and established lounges have been in business for several years with a track record of honoring their obligations. A performance bond of 0.2% of total revenue will be a financial burden that the members feel is both unnecessary and onerous.

**b. Segregated Patron's bank account**

The lounges currently maintain a dedicated bank account for casino earnings and payouts and all casino related flows. Again all the larger and established Gaming lounges have a track record of meeting their obligation to their patrons. The members do not see any purpose in maintaining yet another dedicated bank account.

It should be noted that most of the Gaming lounges are a part of or associated with business groups with the financial capacity to support the Lounges should that be required.

The Association therefore requests that the BGLC taking into consideration our members views and concerns arrange a meeting between our members and the BGLC. This meeting would facilitate an understanding on our members' part for the need for these measures proposed by the BGLC and also to

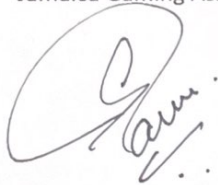
see how we both individually and collectively could look at alternate measures to address the BGLC's concerns.

We also thank the BGLC and the spirit in which you as our regulator have involved us in the discussion and are sure that we can together work out measures that addresses both our concerns.

I look forward to hearing back from you

Sincerely

Jamaica Gaming Association

A handwritten signature in black ink, appearing to read 'Sudu Ramani', with a large, stylized initial 'S' and 'R'.

Sudu Ramani

Secretary