

CALIFORNIA HORSE RACING BOARD
1010 HURLEY WAY, SUITE 300
SACRAMENTO, CA 95825
(916) 263-6000
HAND DELIVERED

ENDORSED FILE
BY THE OFFICE



January 30, 2013

2013 JAN 30 PM 1:51

2013 JAN 31 PM 1:31

Kathleen Eddy, Esq.
Office of Administrative Law
300 Capital Mall, Suite 1250
Sacramento, California 95814

OFFICE OF
ADMINISTRATIVE LAW

Debra Bowen
DEBRA BOWEN
SECRETARY OF STATE

Re: Response to Petition of Global Betting Exchange Re: Alleged Underground Regulations
Certification of California Horse Racing Board To Not Issue, Use, Enforce or Attempt
To Enforce Alleged Underground Regulations

Dear Ms. Eddy:

In response to the Petition filed by Global Wagering Exchange, through its counsel
Drew J. Couto, Esq., Couto & Associates, 1312 Hymettus Avenue, Leucadia, California 92024,
please be advised of the following:

The California Horse Racing Board (CHRB) hereby certifies that the alleged
underground regulations [proposed CHRB Rule 2086.5 (Application for License to Operate
Exchange Wagering), CHRB Rule 2086.6 (Operating Plan Required), CHRB 2089.5
(Requirements to Establish an Exchange Wagering Account) and CHRB Rule 2091.5
(Suspending an Exchange Wagering Account) shall not be issued, used, enforced or attempted
to be enforced prior to being approved by the Office of Administrative Law and filed with the
Secretary of State.

By written delegation of authority, the Executive Director of the California Horse
Racing Board Kirk E. Breed has authorized me to sign and submit this certification.

Proof of Service of this Certification on Petitioner Global Wagering Exchange, through
its counsel Drew J. Couto, is attached.

Sincerely,

A handwritten signature in black ink, appearing to read "Robert B. Miller".

Robert B. Miller, Counsel
California Horse Racing Board

RBM:tbs