

PHILIP D. MURPHY Governor

TAHESHA L. WAY
Lt. Governor

State of New Jersey
DEPARTMENT OF LAW AND PUBLIC SAFETY
DIVISION OF GAMING ENFORCEMENT
1300 ATLANTIC AVENUE
ATLANTIC CITY, NJ 08401

MATTHEW J. PLATKIN Attorney General

MARY JO FLAHERTY
Interim Director

March 27, 2025

CEASE AND DESIST

Via certified, regular, and electronic mail

Vladimir Tenev, CEO Robinhood Markets, Inc. 85 Willow Road Menlo Park, CA 94025 vlad@robinhood.com

Re: <u>Unauthorized Sports Wagering in New Jersey</u>

Dear Vladimir Tenev:

The New Jersey Division of Gaming Enforcement ("Division") is a law enforcement agency within the Office of the Attorney General, charged with the responsibility to investigate and prosecute violations of the New Jersey Casino Control Act, *N.J.S.A.* 5:12-1 et seq, and the New Jersey Sports Wagering Act, *N.J.S.A.* 5:12A-10 et seq.

The Division has accessed your mobile application and website, located at <a href="https://www.robinhood.com">www.robinhood.com</a>, and it has determined that your company, Robinhood Markets, Inc. d/b/a Robinhood ("Robinhood"), is listing unauthorized sports wagers for individuals located within the State of New Jersey. This activity constitutes a violation of the New Jersey Sports Wagering Act, which only permits licensed entities to offer sports wagering to patrons located in New Jersey. See generally N.J.S.A. 5:12A-11. Further, Robinhood is currently offering unauthorized sports wagering to New Jersey residents on collegiate sporting events occurring in New Jersey in violation of the New Jersey Constitution. See N.J. Const. Art. IV, §7,  $\P 2(D)$ . That constitutional provision mandates that "wagering shall not be permitted on a college sport or athletic event that takes place in New Jersey or on a sport or athletic event in which any New Jersey college team participates regardless of where the event takes place."

This letter shall serve as official notice that Robinhood, by facilitating and/or accepting unauthorized sports wagering from individuals within the State of New Jersey, is engaging in activity that is unlawful under not only New Jersey law, but New Jersey's Constitution. The Division demands that you immediately cease and desist from offering any form of sports wagering to New Jersey residents and void any such wagers already placed.





The Division reserves the right to pursue any appropriate sanctions if you fail to take immediate corrective action as demanded herein. Please confirm in writing by Friday, March 28, 2025, by no later than 11:59 pm, that you have ceased all sports wagering activities targeting New Jersey residents and voided all such wagers placed in New Jersey. Failure to comply with this directive will result in the Division taking further enforcement actions, which may include any measures available under New Jersey law.

Sincerely,

Mary Jo Flaherty Interim Director

New Jersey Division of Gaming Enforcement

c: Cari Fais, Director, New Jersey Division of Consumer Affairs
Louis Rogacki, Deputy Director, New Jersey Division of Gaming Enforcement
Michael Golub, Deputy Attorney General, New Jersey Division of Gaming Enforcement
Jamie McKelvey, Deputy Attorney General, New Jersey Division of Gaming Enforcement
New Jersey Casinos
New Jersey Gaming Operators

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