State of New Jersey

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Governor

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Office of the Attorney General
Department of Law and Public Safety
Division of Gaming Enforcement
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December 9, 2021

Jeffrey P. Hendricks, Esq.
Senior Vice President, Regulatory & Compliance
Caesars Entertainment Inc./William Hill US
100 West Liberty Street, 12th Floor
Reno, Nevada 89501

RE: Action in Lieu of Complaint

Dear Jeffrey Hendricks:

The Division of Gaming Enforcement (Division) brings this Action in Lieu of Complaint against William Hill New Jersey, Inc. (William Hill), an applicant for a casino service industry enterprise license and a sports pool operator of a retail sportsbook at Ocean Resort Casino (Ocean) concerning its failure to comply with certain statutory and regulatory requirements set forth in the Casino Control Act, *N.J.S.A.* 5:12-1 *et seq.* (Act), the Sports Wagering Law, *N.J.S.A.* 5:12A-10 *et seq.* (SWL), and the regulations promulgated thereunder. In particular, William Hill violated the provisions of *N.J.S.A.* 5:12-91a, *N.J.S.A.* 5:12A-12d, *N.J.A.C.* 13:69N-1.5, *N.J.A.C.* 13:69A-1.2, and *N.J.A.C.* 13:69C-9.2 by employing an individual in the capacity of a ticket writer at William Hill's sportsbook at Ocean, a position requiring the employee to hold a valid casino employee registration (registration), without such registration and thereby failed to ensure that the employee had a valid registration while he continued to perform his job functions after William Hill received notification on May 13, 2021, that his registration was revoked.

By email dated October 11, 2021, William Hill self reported to the Division that it had employed Jeffrey Gibbs (JG), registration #35083-35, in the capacity of a ticker writer from May 13, 2021 until September 24, 2021 while JG's registration was revoked; William Hill thereby committed violations by failing to ensure that JG held a valid registration and by not complying with the Division's weekly Restricted Employment and Application List (REAL). William Hill permitted JG to continue to work as a ticket writer from May 13, 2021 until September 24, 2021, after William Hill had received notification on May 13, 2021 via the REAL list that his registration had been revoked on May 7, 2021. William Hill further advised that from May 13,

2021 to September 24, 2021, JB worked 94 days. JG was considered a full-time employee and he generally worked from Saturday to Wednesday. As a result of these findings, JG's employment was placed on suspension and William Hill has implemented a process within its Human Resources department to ensure that the REAL list is reviewed for both new hires and all existing employees.

In pertinent part, Section 91a of the Act states that "[n]o person may commence employment as a casino employee unless such person has a valid registration on file with the division." Further, Section 12d of the SWL states, in pertinent part, that "[a]ll persons employed directly in wagering-related activities conducted within a casino . . . in a sports wagering lounge . . . shall be licensed as a casino key employee or registered as a casino employee . . . pursuant to the provisions of [the Act.]" Furthermore, *N.J.A.C.* 13:69N-1.5 requires "[a] person directly involved in sports pool or online sports pool wagering shall either be licensed as a casino key employee or registered by the Division as a casino employee." Moreover, *N.J.A.C.* 13:69A-1.2 sets forth a non-exhaustive list of positions requiring the employee, "to hold, prior to such employment, a current and valid casino employee registration [. . .]." The position of sportsbook ticker writer in a retail sportsbook requires a registration. Finally, *N.J.A.C.* 13:69C-9.2 requires that within 24 hours of receipt of the REAL list notice from the Division each Thursday, the licensee "shall terminate or suspend employment of any person whose" registration "has been denied, revoked or suspended." In the instant matter pertaining to the employment of JG as a sportsbook ticket writer, William Hill violated the above-mentioned statutes and regulations by permitting JG to continue to work as a ticket writer after William Hill received notification of his revocation on May 13, 2021 through and until September 24, 2021.

The Division therefore accepts the offer of William Hill to render a civil monetary penalty pursuant to *N.J.S.A.* 5:12-123, -129, and -130 in the amount of $10,000 payable under the Act in accordance with *N.J.S.A.* 5:12-145a. While this matter was self reported to the Division, William Hill has agreed to pay such amount in recognition of the seriousness of its failures related to non compliance with the mandates of *N.J.S.A.* 5:12-91a, *N.J.S.A.* 5:12A-12d, *N.J.A.C.* 13:69N-1.5, *N.J.A.C.* 13:69A-1.2, and *N.J.A.C.* 13:69C-9.2 regarding the continued employment of JG as a ticket writer after William Hill received notification on May 13, 2021 that his registration was revoked, as well as in recognition of William Hill's prior regulatory violation and subsequent action in lieu of complaint dated July 20, 2021. Any subsequent violations of the above-referenced or other statutes and regulations by William Hill may result in further regulatory action by the Division as appropriate under the circumstances.

Sincerely,

DAVID REBUCK
DIRECTOR

DR/dml
c: Lisa Rankin, Director of Compliance