State of New Jersey

Philip D. Murphy
Governor

Sheila Y. Oliver
Lt. Governor

Office of the Attorney General
Department of Law and Public Safety
Division of Gaming Enforcement
P.O. Box 047
Trenton, NJ 08625-0047

Andrew J. Bruck
Acting Attorney General

David Rebuck
Director

July 20, 2021

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

RE: Action in Lieu of Complaint

Dear Mr. 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 Caesars Atlantic City (Caesars) 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 Caesars, 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to perform his job functions after William Hill received notification on December 10, 2020 that his registration was revoked.

By email dated April 26, 2021, William Hill self reported to the Division that it had employed Derrick Bair, registration #041230-35, in the capacity of a ticker writer from December 10, 2020 until April 22, 2021 while his registration was revoked; William Hill thereby committed violations by failing to ensure that he held a valid registration and by not complying with the Division's weekly Restricted Employment and Application List (REAL). William Hill further advised that from December 10, 2020 to April 22, 2021, Mr. Bair worked 77 days. Mr. Bair was considered a part-time employee, however, he did have some weeks during that time frame that he worked more than 30 hours. As a result of these findings, Mr. Bair'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. Accordingly, William Hill permitted Mr. Bair to continue to work as a ticket writer from December 10, 2020 until April 22, 2021, after William Hill had received notification on December 10, 2020 via the REAL list that his registration had been revoked on December 4, 2020.

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 Mr. Bair as a sportsbook ticket writer, William Hill violated the above-mentioned statutes and regulations by permitting Mr. Bair to continue to work as a ticket writer after William Hill received notification of his revocation on December 10, 2020 until April 22, 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 $5,000 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 Mr. Blair as a ticket writer after William Hill received notification on December 10, 2020 that his registration was revoked. 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