



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

July 18, 2025

Carolyn Barth Renzin, FanDuel Chief Legal & Compliance Officer
290 Park Avenue, 15th Floor
New York, NY 10017

Re: NOTICE OF VIOLATION; Activation of Unauthorized Promotional Spins
N.J.A.C. 13:690-1.9(a) and (b)

Dear Carolyn Barth Renzin:

The Division of Gaming Enforcement (“Division”) completed an investigation regarding FanDuel’s failure to receive necessary Division approval prior to activating promotional spins, which resulted in inaccurate revenue reporting.

N.J.A.C. 13:690-1.9 specifies the reporting requirements for internet and mobile gaming operators in New Jersey, specifically mandating that online operators generate and submit various reports to the Division to ensure accurate revenue reporting occurs. These reports are integral and relied on by the Division to verify the accuracy of all revenue.

On March 18, 2024, the Division discovered through an incident report from FanDuel that the promotional spin function was erroneously activated on International Game Technology (“IGT”) and Evolution Remote Gaming Server (“RGS”) games without obtaining approval from the Division beforehand. The first instance occurred through the IGT server in June of 2023. More specifically, in 2022, FanDuel submitted release notes to update the reporting logic for promotional spins in their revenue reports. Even though the release notes were approved, the promotional spins could not launch until testing was demonstrated, which did not occur. In January 2024, FanDuel again activated promotional spins without Division approval through Evolution RGS games. Although the Division granted general release note approval, functionality testing was needed prior to activation of the spins. These failures to obtain approval caused inaccuracies in revenue reporting. Ultimately, the Division approved the promotional spins for both IGT and Evolution RGS games on February 23, 2024. To mitigate the risk of this occurring again, FanDuel conducted a re-training of its employees.



Based upon these incidents, pursuant to *N.J.A.C. 13:69B-2.9*, the Division is exercising its authority to impose a civil penalty. Upon receipt of a Notice of Violation, a licensee shall respond to the Division and either acknowledge the violation and agree to the proposed penalty within 30 days or if the allegation is denied or the penalty is disputed, the matter shall proceed as a contested case. *N.J.A.C. 13:69B-2.9c*. Alternatively, failure to respond within 30 days will also result in the matter proceeding as a contested case.

Based upon the facts set forth above, the Division has determined that a civil penalty in the amount of **\$2,000** is appropriate. If FanDuel agrees with the civil penalty determination, please sign this letter in the space provided below and return it to the undersigned within 30 days. Upon receipt of the signed letter, an Order assessing the civil penalty will be issued. However, if FanDuel disputes the Division's determination, please advise the undersigned so appropriate proceedings may be scheduled.

Lastly, FanDuel is hereby advised that continued non compliance, no matter how de minimis, regarding the above-mentioned regulatory requirements will result in further regulatory action.

Sincerely,

Gina DeAnnuntis

Gina DeAnnuntis
Deputy Attorney General

File: D-474-24-044

FanDuel agrees with the Division's determination that a civil penalty in the amount of **\$2,000** is appropriate to resolve the above-described violations.

Dated: _____

Carolyn Barth Renzin