



New Jersey and are not prohibited from doing so by reason of being excluded, self-excluded, underage or otherwise prohibited.

2. RSI offers online gaming to the public in partnership with Golden Nugget Atlantic City, LLC (“GNAC”) through [www.playsugarhouse.com](http://www.playsugarhouse.com).

3. GNAC holds, and at all times relevant hereto, held, a valid casino license and Internet gaming permit. Accordingly, GNAC was authorized to conduct Internet gaming.

4. *N.J.S.A. 5:12-71.119(a)* in pertinent part prohibits persons who are under the age of 21 from placing wagers in a casino.

5. *N.J.A.C. 13:69O-1.3(b)5* provides in pertinent part that a casino licensee must verify that a patron is of the legal age of twenty-one in order to establish an Internet or mobile gaming account.

6. *N.J.A.C. 13:69O-1.4(c)2* provides in pertinent part that “[a]n Internet or mobile gaming system shall be designed to detect and report ... any person who is prohibited from entering a casino . . . pursuant to *N.J.S.A. 5:12-119(a)*.”

7. Due to a software defect in RSI code discovered on January 29, 2018, thirteen patrons ranging from eighteen to twenty years old, to wit, TA, SB, MC, AG, KH, SM, MM, CN, DP, AR, AS, IV, and CW, were able to create online gaming accounts and place wagers. Three of these patrons also made deposits to their accounts. The other ten patrons wagered using bonus funds that were issued at the time of registration.

8. The total wagers from all thirteen accounts were \$4,977.76. The underage individual with the largest amount of deposits, SM, deposited \$740.00 and had total losses of \$190.00.

9. RSI's Know Your Customer ("KYC") process verifies a patron's age using the date of birth ("DOB"). Instead of using a patron's exact DOB, the software defect allowed for a three-year variation of the DOB, thereby causing the KYC process to fail to detect the underage patrons.

10. The underage patrons were able to make wagers from November 10, 2016, the registration date of the first underage patron, until RSI successfully deployed an emergency fix on January 30, 2018.

11. Based on the information set forth in paragraphs 1 through 10 above, RSI allowed thirteen underage patrons to create online accounts and place wagers in violation of *N.J.A.C. 13:69O-1.3(b)5* and *N.J.A.C. 13:69O-1.4(c)2*.

**WHEREFORE**, Complainant demands the following relief:

A. Judgment that RSI violated *N.J.A.C. 13:69O-1.3(b)5* and *N.J.A.C. 13:69O-1.4(c)2*;

B. Judgment imposing an appropriate civil penalty pursuant to *N.J.S.A. 5:12-129a(5)*; and

C. Judgment imposing such other relief as may be deemed just and appropriate under the circumstances.

Respectfully submitted,

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