



State of New Jersey

Chris Christie
Governor

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

John J. Hoffman
Acting Attorney General

Kim Guadagno
Lt. Governor

David Rebeck
Director

September 11, 2013

ALL CASINO CEO'S AND CASINO COUNSEL

RE: Required Information - Internet Gaming

On June 3, 2013, the Division issued a request for certain information to be provided in order to ensure consideration for the approval of Internet gaming. The Division's review of those submissions filed to date has revealed omissions where the applicant has failed to provide important hardware and specifications relating to technology, failed to have internet service providers disclose contracts with third party vendors and/or failed to file copies of all relevant contracts with third-party services providers. The failure to provide such information is affecting the Division's ability to review and approve submissions and address licensing issues necessary for the issuance of a transactional waiver or Interim Casino Authorization.

In order to ensure each casino's application is complete, you are required to provide the name and contact information for the primary person responsible for your Internet gaming submission by close of business day tomorrow. Additionally, unless otherwise specified, all information listed below is required to be submitted to the Division, in duplicate and in electronic format, by close of business day September 20, 2013. Additionally, please submit three copies of each contract where requested below.

Please provide the contact name and all required information to the following person:

Eric Weiss, TSB Bureau Chief
Division of Gaming Enforcement
2nd Floor, Technical Services Bureau
1300 Atlantic Avenue
Atlantic City, NJ 08401



(609) 292-9394

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Hardware/Software

1. Provide a detailed list of client terminal devices and game software formats (i.e., HTML5, flash, .exe, etc.) that will be used with your platform. All necessary software and hardware required to verify functionality must also be provided to the Division, including one representative sample of each type of device per operating system (i.e., phone, tablet, laptop, etc.).

Geolocation

1. A copy of the contract which details the agreement between the platform provider and the geolocation company providing the service.
2. The vendor registration number issued by the Division to the geolocation company that is planned for use at "go-live". Please note that geolocation vendors require an ancillary license.
3. A detailed list of third-party service companies that the geolocation provider plans to utilize (i.e., maps, databases, etc.), including contracts and the Division issued vendor registration number for the third party provider. Include the last date when the database(s) was updated and the frequency that it is updated.
4. The specific method(s) by which each type of client terminal device and game software formats (i.e., HTML5, flash, exe, etc.) will be geolocated and prevented from being used to wager outside the state of New Jersey.
5. Provide a detailed description of the geolocation process which describes the functions performed by the geolocation provider versus those performed by the Internet gaming platform. This description shall identify all processes which require human interaction/decision making.
6. Specify the anticipated location of all staff who will perform geolocation functions on behalf of the casino licensee at "go-live".
7. Provide internal controls and a table of organization for all processes governing geolocation including system functionality, required parameter settings, employee access controls and manual functions performed by staff. Please specify controls for all functions including those that will be performed by casino staff, the platform provider or other third party. The deadline for this item is October 1, 2013.

Know Your Customer including age identification (KYC)

1. A copy of the contract which details the agreement between the platform provider and the KYC vendor(s) providing the service.
2. The vendor registration number that was issued by the Division to the KYC company planned for use at "go-live". Please note that KYC vendors require an ancillary license.
3. A detailed list of third-party service companies that the KYC provider plans to utilize (i.e., services, databases, etc.), including contracts and the Division issued vendor registration number. Include the last date when the database(s) was updated and the frequency that it is updated.

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4. Provide a detailed description of the KYC process which describes the functions performed by the KYC provider versus those performed by the Internet gaming platform. This description shall identify all processes which require human interaction/decision making.
5. Specify the anticipated location of all staff who will perform KYC functions on behalf of the casino licensee at "go-live".
6. Provide internal controls governing all KYC processes including employee access controls and manual functions performed by staff. Please specify controls for all functions including those that will be performed by casino staff, the platform provider or other third party. The deadline for this item is October 1, 2013.

Payment Processing (Deposits/Withdrawals)

1. A copy of the contract(s) which details the agreement between the platform provider and payment processing company providing the service.
2. The vendor registration number issued by the Division to the payment processing company that is planned for use at "go-live".
3. A detailed list of third-party service companies that each payment processing provider plans to utilize including contracts and their Division issued vendor registration number.
4. Provide a detailed description of each payment processing process that is planned for use at "go-live". Describe the functions performed by the payment processing provider versus those performed by the Internet gaming platform. This description shall identify all processes which require human interaction/decision making.
5. Specify the anticipated location of all staff that will perform payment processing functions on behalf of the casino licensee at "go-live".
6. Provide internal controls governing all payment processing processes including access controls and manual functions performed by staff. Please specify controls for all functions including those that will be performed by casino staff, the platform provider or other third party. The deadline for this item is October 1, 2013.

Responsible Gaming Measures

1. Provide a detailed description of your platform's responsible gaming processes. Describe the functions automated by the platform versus those that require human interaction/decision making.
2. Specify the anticipated location of all staff that will perform responsible gaming functions on behalf of the casino licensee at "go-live".
3. Provide internal controls governing all responsible gaming processes including employee access controls and manual functions performed by staff. Please specify controls for all functions including those that will be performed by casino staff, the platform provider or other third party. The deadline for this item is October 1, 2013.

Anti-Money Laundering

1. Provide a detailed description of your platform's anti-money laundering processes. Describe the functions automated by the platform versus those that require human interaction/decision making.
2. Specify the anticipated location of all staff that will perform anti-money laundering functions on behalf of the casino licensee at "go-live".
3. Provide internal controls governing all anti-money laundering processes including access control and manual functions performed by staff. Please specify controls for all functions including those that will be performed by casino staff, the platform provider or other third party. The deadline for this item is October 1, 2013.

Player Collusion

1. Provide a detailed description of your platform's player collusion detection processes. Describe the functions automated by the platform versus those that require human interaction/decision making.
2. Specify the anticipated location of all staff that will perform player collusion detection functions on behalf of the casino licensee at "go-live".
3. Specify in detail how the platform provider prevents anyone from having knowledge of player cards (other than the player) during live play or access to any game outcome prior to the conclusion of play.
4. Provide internal controls governing all player collusion detection processes including access control and manual functions performed by staff. Please specify controls for all functions including those that will be performed by casino staff, the platform provider or other third party. The deadline for this item is October 1, 2013.

Remote Gaming Server (RGS)

1. A copy of the contract which details the agreement between the platform provider and the RGS company providing the service.
2. The vendor registration number issued by the Division to the RGS company that is planned for use at "go-live". Please note, a 92(a)1 license is required for all RGS manufacturers.
3. A detailed list of third-party service companies that the RGS provider plans to utilize (i.e., game development, geolocation, etc.), including contracts and the Division issued vendor registration number for the third party provider.
4. Specify the planned location of the RGS equipment.
5. Specify the anticipated location of all staff who will perform RGS functions on behalf of the casino licensee/platform provider at "go-live".
6. Provide internal controls governing RGS processes including employee access and manual functions performed by staff. Please specify controls for all functions including those that will be performed by casino staff, the platform provider or other third party. The deadline for this item is October 1, 2013.

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7. Specify if the RGS will perform any critical functions such as geolocation, K.C., player collusion, antimoney laundering and responsible gaming.

Open Issues

1. Based on the Internet gaming compliance checklist that was provided by the Division, please itemize all noncompliance issues and the estimated date of compliance.
2. Provide a detailed list of all action items or unanswered questions that are awaiting a response from the Division.

Sincerely,



David Rebeck,
Director

ESW

c: George Rover, Deputy Director
MaryJo Flaherty, Deputy Director
Charles F. Kimmel, Deputy Attorney General
Don Errera, Chief
Eric Weiss, TSB Bureau Chief
Division Internet Gaming Team
Internet Gaming Platform and RGS Representatives