



(3) *Incident 1:*

(a) On or about November 13, 2021, AWI accepted 126 wagers amounting to \$6,035.65 in handle on a National Collegiate Athletic Association (NCAA) basketball game that took place in the District of Columbia ("District") at the St. Elizabeth's Entertainment and Sports Arena located at 1100 Oak Drive SE, Washington, DC 20032.

(b) The Office's administrative rules require that Sports Wagering Operators promptly, but no longer than twenty-four (24) hours, report to the Office facts or circumstances related to its operation that may constitute a violation of District or federal law.

(c) AWI became aware they accepted prohibited wagers on November 13, 2021 but did not report it to the Office until three days beyond the 24-hour period.

(4) *Incident 2:*

(a) On or about November 16, 2021, AWI accepted 145 prohibited wagers amounting to \$5,847.65 in handle on two NCAA basketball events that involved a collegiate team based in the District.

(b) The Office's administrative rules require that Sports Wagering Operators promptly, but no longer than twenty-four (24) hours, report to the Office facts or circumstances related to its operation that may constitute a violation of District or federal law.

(c) On November 17, 2021, AWI became aware they accepted prohibited wagers on November 16, 2021 but did not report it to the Office until one day beyond the 24-hour period.

(5) *Incident 3:*

(a) On or about February 6, 2022, AWI accepted 72 prohibited amounting to \$4,836.50 on a NCAA basketball game that took place in the District at Capital One Arena located at 601 F St., Washington, DC and involved a collegiate team that is based in the District.

(b) AWI reported accepting the prohibited wagers within 24-hours after becoming aware of facts or circumstances related to its operation that may constitute a violation of District or federal law.

(6) *Remediation Efforts:*

(a) The Office recognizes that AWI is making efforts to replace its current sports wagering system to a more robust system that has been implemented in several other jurisdictions and that has safeguards to lessen the risk of prohibited wagers from occurring.

(b) AWI anticipates implementing the new sports wagering system in early September 2022.

(c) AWI has provided the Office with remedial measures it will take to prevent further violations of District law and administrative rules pending conversion to its new sports wagering system.

(d) The Office also notes AWI's cooperation during the Office's investigation into the prohibited wager violations.

**IV.  
Conclusions of Law**

(1) Based upon Findings of Fact 3(a), AWI violated Tit. 30, D.C. MUN. REGS., §§ 2108.8 and 2127.1(b), which prohibits Sports Wagering Operators from accepting wagers on any collegiate sports or athletic event that takes place in the District.

(2) Based upon Findings of Fact 3(b) and (c), AWI violated Tit. 30, MUN. REGS., § 2108.1(c), which requires Sports Wagering Operators to promptly, but no longer than twenty-four (24) hours, report to the Office facts or circumstances related to the operation of a sports wagering Licensee that may constitute a violation of District or federal law.

(3) Based upon Findings of Fact 4(a), AWI violated Tit. 30, D.C. MUN. REGS., §§ 2108.8 and 2127.1(a), which prohibits Sports Wagering Operators from accepting wagers on any collegiate sports or athletic event in which any District of Columbia based college or university team participates regardless of where the event takes place.

(4) Based upon Findings of Fact 4(b) and (c), AWI violated Tit. 30, D.C. MUN. REGS., § 2108.1(c), which requires Sports Wagering Operators to promptly, but no longer than twenty-four (24) hours, report to the Office facts or circumstances related to the operation of a sports wagering Licensee that may constitute a violation of District or federal law.

(5) Based upon Findings of Fact 5(a), AWI violated Tit. 30, D.C. MUN. REGS., §§ 2108.8 and 2127.1(a), which prohibits Sports Wagering Operators from accepting wagers on any collegiate sports or athletic event in which any District of Columbia based college or university team participates regardless of where the event takes place.

(6) Based upon Findings of Fact 5(a), AWI violated Tit. 30, D.C. MUN. REGS., §§ 2108.8 and 2127(b), which prohibits Sports Wagering Operators from accepting wagers on any collegiate sports or athletic event that takes place in the District.

**V.  
CONSENT ORDER**

Based upon the forgoing Findings of Fact and Conclusions of Law

(1) It is **ORDERED** that AWI pay a fine of \$50,000.

(2) It is further **ORDERED** that AWI pay the \$50,000 fine to the Office within 15 business days of the date of issuance of this Order in a manner prescribed by the Office.

(3) It is further **ORDERED** that in consenting to the fine, AWI agrees to waive its rights to request a hearing with the Office of General Counsel pursuant to D.C. MUN. REGS., § 2135 or to appeal this Order pursuant to D.C. Official Code § 36-621.14(b).

(4) It is further **ORDERED** that this matter is now **CLOSED**.

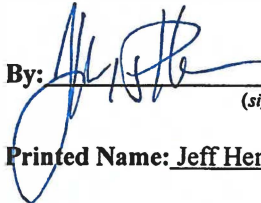
ISSUED this 3rd day of May, 2022



**Frank Suarez**  
Executive Director

**AGREED AS TO FORM AND SUBSTANCE:**

**American Wagering, Inc.**

By:  \_\_\_\_\_  
(signature)

Printed Name: Jeff Hendricks

Title: SVP and Assistant General Counsel

Date: 05/02/2022

**Office of Lottery and Gaming**

By:  \_\_\_\_\_  
(Signature)

Printed Name: Ridgely C. Bennet

Title: Chief Counsel

Date: 5/3/2022

By: Peter S Alvarado \_\_\_\_\_  
(Signature)

Printed Name: Peter S. Alvarado

Title: Director of Regulation and Oversight

Date: 5/2/2022