STATE OF MICHIGAN MICHIGAN GAMING CONTROL BOARD

In the Matter of:

American Wagering, Inc.

d/b/a/ William Hill Sports Book
License Nos. IGSL-007537 and SBSL-007537

Respondent.

FINAL DECISION AND ORDER

On July 14, 2025, the Executive Director issued a Notice of Opportunity to Show Compliance (NOSC) to Respondent alleging violations of various Internet gaming and Internet sports betting rules including Mich Admin Code, R 432.664, R 432.774, R 432.639(2)(a)(iii), R 432.739(2)(a)(iii), R 432.655a and R 432.755a when it allowed a patron to access the unsecured systems application and make 116 deposits with no physical cash deposit or other authorized method of account funding.

The Respondent signed the Acknowledgement of Violation (AOV) on July 28, 2025, which represents the Respondent's agreement to pay a \$100,000 fine in addition as a full and final resolution of the matter. The Executive Director signed the AOV on August 11, 2025.

IT IS THEREFORE ORDERED that the terms and conditions contained within the AOV are hereby adopted and incorporated herein as if fully restated.

IT IS FURTHER ORDERED that this constitutes a full and final resolution of the matter set forth in the NOSC.

IT IS SO ORDERED.

MICHIGAN GAMING CONTROL BOARD

J**(r**h Ananich, Chair

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| Andrew T. Palms |
| Jonis |
| Joni M. T. Davis |
| Deidre Bounds |
| Deidre Lambert-Bounds |
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Mark Evenson

Received and filed this 9^{th} day of September 2025:

Board Analyst

| Notice of Opportunity to Show Compliance/Acknowledgement of Violation | | | | |
|---|-------------------------|--------------------------------------|--|--|
| PARTIES | | | | |
| Michigan Gaming Control Board | | American Wagering d/b/a William Hill | | |
| (Board) | | License No: 007537 | | |
| MGCB CASE NO. | SDA-2025-8 (IG-2023-53) | | | |
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The Licensee reported, and the Board's investigation confirmed, that a systems application, whose purpose was to allow representatives of the Licensee to update patron account balances to reflect physical cash deposits made by a patron, was unsecured. In April 2023, this resulted in a patron being able to access the unsecured systems application and make 116 "deposits" totaling \$2,156,625.00 with no physical cash deposit or other authorized method of account funding to support these 116 "deposits." The patron was then able to make wagers totaling over \$88 million and withdraw \$591,469.65.

| VIOLATION (add more rows as applicable) | FINE |
|--|------------|
| Failure to comply with all internal control procedures that have been approved in writing by the Board. [LIGA Rule 432.664; LSBA Rule 432.764 and Internal Control Standards related to LIGA Rule 432.639(2)(a)(iii), LSBA Rule 432.739(2)(a)(iii), LIGA Rule 432.655a, and LSBA Rule 432.755a]. | \$100,000 |
| Rule 432.716 Reasons for investigation of, or disciplinary action against, licensee. | See above. |
| Rule 432.639(2)(a)(iii) Internet gaming operators and internet gaming platform provider technical and security standards (controls). | See above. |
| Rule 432.739(2)(a)(iii) Internet gaming operators and internet gaming platform provider technical and security standards (controls). | See above. |
| Rule 432.655a Internet wagering account funding. | See above. |
| Rule 432.755a Internet wagering account funding. | See above. |

The Executive Director issues this Notice of Opportunity to Show Compliance. The Licensee has 14 days after service in which to request a compliance conference or execute the Acknowledgement of Violation below. Otherwise, this Notice will be the basis for initiating disciplinary action through the contested case provisions of the Lawful Internet Gaming Act, MCL 432.301 through 432.322 and related Administrative Rules R432.611 through 432.676, Lawful Sports Betting Act, MCL 432.401 through 432.422 and related Administrative Rules R432.711 through 432.776, and the Administrative Procedures Act.

| Executive Director: | Date of Service: | July 14, 2025 |
|---|------------------|---------------|
| (1) REQUEST FOR COMPLIANCE CONFERENCE: | | |
| American Wagering d/b/a William Hill License No.: 007537 | | |
| By: Lisa Rankin Its: VP of Compliance and Licensing Date: | | |

- (2) ACKNOWLEDGEMENT OF VIOLATION (AOV): By signing below, Executive Director and Licensee agree that:
- 1. The Board's investigation is complete and this AOV constitutes a full and final resolution of the matter set forth above. This AOV precludes the Board from taking further action against the Licensee in this matter under the Lawful Sports Betting Act, MCL 432.401 through 432.422, Lawful Internet Gaming Act, MCL 432.301 through 432.322, Administrative Rules, R 342.611-432.676, and R 432.711 through 432.776. However, this AOV does not preclude the Board from opening a separate investigation if later it determines or learns of relevant information that was knowingly or unknowingly withheld by the Licensee.
- 2. Any admissions set forth herein and the agreement to pay the fine(s) are made solely for resolving this Notice, with no applicability in any other context except as set forth herein. The Board reserves the right, however, to consider this AOV in the context of licensing and subsequent disciplinary proceedings.
- 3. This AOV is not valid or enforceable until executed by both the Executive Director and the Licensee and accepted by the Board. If the Board does not accept the AOV as a resolution to this matter, all admissions made for purposes of this AOV, and all sanctions set forth are deemed void and may not be used for any purpose by either party in any subsequent proceeding or otherwise.
- 4. The Executive Director and Licensee agree that each has the authority to settle this matter in accordance with the terms of this AOV.
- 5. The interests of the public, Board, gaming, and Licensee are best served by entering this AOV without further proceedings.
- 6. Licensee must pay the fine(s) by business check payable to the State of Michigan within 30 days after the Board mails the final order. The MGCB case number must be on face of the check. Check must be mailed to: Michigan Gaming Control Board, Online Gaming & Legal Affairs Division, 3062 W. Grand Blvd., L-700, Detroit, MI 48202-6062.
- 7. Licensee understands and agrees that by entering this AOV, the Licensee is waiving its right to hearing before an administrative hearing office. The Licensee also understands and agrees that there shall be no administrative or judicial appeals related to this matter.
- 8. Licensee releases Board, Executive Director, and its employees from all claims, whether known or unknown, that exists or may exist relating to the alleged violation that gave rise to this AOV.
- 9. Subject to Board approval, Licensee may attach a brief mitigation statement outlining the measures taken to ensure this type of violation does not occur in the future.

| American Wagering d/b/a William Hill License No. 007537 | MICHIGAN GAMING CONTROL BOARD | |
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| By: Lisa Rankin Lisa Rankin | By: Henry Williams | |
| Its: VP of Compliance and Licensing | Its: Executive Director | |
| Date: July 28 20.25 | | |