



# THE COMMONWEALTH OF MASSACHUSETTS OFFICE OF THE ATTORNEY GENERAL

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## **VIA EMAIL**

Cathy Judd-Stein, Chair  
Bradford R. Hill, Commissioner  
Jordan Maynard, Commissioner  
Eileen O'Brien, Commissioner  
Nakisha Skinner, Commissioner  
Massachusetts Gaming Commission  
101 Federal Street, 12th Floor  
Boston, MA 02110

### **Re: Mobile Sports Wagering Regulations**

Dear Chair Judd-Stein and Commissioners Hill, Maynard, O'Brien and Skinner:

We understand from the Massachusetts Gaming Commission's timeline that, in the near term, mobile sports wagering will debut in the Commonwealth. When that day arrives, legal gambling will expand well beyond the handful of brick-and-mortar sites that now host it to every city and town in the state. Any smartphone is on the verge of becoming a digital sportsbook. With this expansion, the population of gamblers—and potential problem gamblers—may grow substantially. We look forward to working with the Commission to address and mitigate the challenges that will follow, particularly as we enforce existing laws to protect consumers and young people.

Let us be clear at the outset. The legalization of mobile sports wagering is the product of a democratic process that the Attorney General's Office ("AGO") supports completely. The Massachusetts Sports Wagering Act that became law in August 2022 envisioned not just mobile sports wagering, but safe and responsible mobile sports wagering. We believe, just as the Legislature did, that public health and safety and corporate responsibility are essential to the entire enterprise. The public will be looking to the Commission to ensure safe and responsible conduct by sports wagering operators, just as the Commission has done in the context of casinos. We know, too, that the public expects, and the law envisions, that the AGO will exercise its authority to ensure that the promotion of mass market products—imminently to include sports gaming apps—is safe, transparent, and responsible.

Two core responsibilities of the AGO are the protection of consumers and young people, particularly in the context of paid advertising and promotion. We have decades of experience on these issues. And, over the past decade, we have also had the responsibility to prosecute criminal violations of the state

gaming law.<sup>1</sup> This experience has taught us that without meaningful guardrails governing how mobile sports wagering is marketed and promoted, the Commonwealth—especially our young people—will be unduly exposed to potentially addicting products. In recent years we have seen time and again that when any new consumer product is rolled out, fairness and accuracy in advertising is essential from day one. All the more so when the product implicates serious public health considerations.

We know this experience aligns with the Commission’s own research, which has found “exposure to gambling advertising” to be associated with “increases in gambling and problem gambling behavior. These patterns are consistent with those found in the fields of alcohol, tobacco, and electronic cigarettes.”<sup>2</sup> The current deluge of advertising by gaming operators, and the all but certain increase in the population of sports gambling activity in the Commonwealth,<sup>3</sup> makes responsible commercial conduct even more imperative.

In that spirit, we offer today’s comments on the Commission’s draft regulations, emphasizing five points:

- The Commission’s regulations on mobile sports wagering must complement consumer protections set forth in other state and federal laws, with which the gaming operators and their vendors must comply, just like every other business in the state.
- No sports wagering marketing or promotion should be targeted at young people under age 21, and the Commission’s regulations should be strengthened to achieve this important goal.
- To avoid inundating those suffering from or believed to be at risk of gambling addiction with repeated invitations to wager, the Commission must carefully scrutinize app design to prevent addictive elements and strictly limit the ability of gaming operators and their marketing partners to target those vulnerable populations with online advertising or communications.
- The Commission should strictly limit—and, in certain circumstances, outright prohibit—the potentially deceptive use of “experts” or “insiders” paid by operators and promotions that distort the gaming experience and its risks and benefits.
- The Commission should require gaming operators to use their extensive data about customer behavior to identify and intervene with problem gamblers to direct them toward appropriate supports and assistance.

We have followed closely as the Commission has heard from gaming operators that they are part of a new and developing industry. This changing landscape demands prudence and caution, especially given the

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<sup>1</sup> See G.L. c. 23K, § 6.

<sup>2</sup> Mark Vander Linden *et al.*, *Responsible Gaming Considerations for Gambling Advertising*, MASSACHUSETTS GAMING COMMISSION, at 4 (June 9, 2022), <https://massgaming.com/wp-content/uploads/Gambling-Advertising-White-Paper-6.9.22.pdf> (citation omitted).

<sup>3</sup> The Commission’s research partner has suggested that even before the legalization of sports wagering, somewhere between 13% and 20% of Bay State adults gambled on sports. See Rachel A. Volberg *et al.*, *Legalized Sports Betting in the United States and Potential Impacts in Mass.* (“*Potential Impacts*”), SOCIAL AND ECONOMIC IMPACTS OF GAMBLING IN MASS., UNIV. MASS. SCH. PUB. HEALTH AND HEALTH SCIS., at 36 (Aug. 22, 2022), <https://massgaming.com/wp-content/uploads/SEIGMA-Sports-Betting-Impacts-Report-9.8.22-1.pdf> (presented to the Commission on Sept. 8, 2022).

addiction and public health considerations at play. In addition, sports wagering operators have been actively marketing their products in the rollout of mobile betting, sometimes in ways that appear not to reconcile with the Commission's existing emergency or draft regulations. Accordingly, the Commission should provide additional clarity in the near term to ensure responsible conduct during the important early days of mobile wagering.

**1. The Commission's Regulations Must Complement the Existing Consumer Protections in State and Federal Laws, With Which All Businesses in the State Must Comply.**

We appreciate the Commission's work to carry out the legislatively conferred obligation to expressly prohibit certain unfair and deceptive practices by sports wagering operators.<sup>4</sup> Of course, in addressing such practices, the Commission does not paint on a blank canvas. The emerging digital sports wagering industry must act within the context of existing laws and regulations designed to promote fairness in the marketplace, like all commercial enterprises affecting Massachusetts residents.<sup>5</sup>

To avoid any future, incorrect argument otherwise from regulated entities, the Commission should expressly state that its regulations, and particularly those related to advertising and marketing, are in addition to, and are not intended to displace, the Commonwealth's preexisting and extensive consumer protection laws. Those laws include without limitation the Massachusetts Consumer Protection Act, G.L. c. 93A, and regulations established by our Office under that Act. The Federal Trade Commission Act, 15 U.S.C. § 45(a)(1), and the regulations and guidance interpreting that statute also apply. The Commission should ensure that its regulations are consistent with these and other existing laws and regulations.

**2. No Promotion or Marketing of Sports Gaming Should Be Targeted at Young People.**

The AGO appreciates the Commission's efforts to protect underage youth from harmful exposure to sports wagering, which is a goal that we share. With that goal in mind, the Commission's draft and emergency regulations should be strengthened.

The Commission's advertising regulations limit the placement of paid marketing and promotion in areas likely to be viewed by young people, including, for example, mass media with a young audience and outlets serving colleges and universities.<sup>6</sup> These regulations should be amended to more directly address social media (e.g., Instagram and TikTok) and connected television platforms (e.g., YouTube TV and Hulu). Many such platforms allow individuals under a certain age (actual or predicted) to be excluded from an advertiser's audience. Where technically feasible, operators and their vendors should be mandated to exclude any age category that includes those under the age of 21. We understand from our diligence that certain operators would welcome this mandate. Where an operator can demonstrate that this type of exclusion is not feasible or available, however, operators should still not be permitted to promote or market on platforms where 25% or more of the audience is under 21, consistent with the standard for other marketing settings under the current draft regulations.<sup>7</sup> This is particularly important given that

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<sup>4</sup> See G.L. c. 23N, § 4(c)-(d).

<sup>5</sup> See generally G.L. c. 93A; 940 CMR 3.00; 15 U.S.C. § 45(a)(1).

<sup>6</sup> See 205 CMR 256.05(4).

<sup>7</sup> See 205 CMR 256.05(4)(b) & (e).

operators are presently advertising through paid social media influencers who have potentially substantial underage audiences.<sup>8</sup>

Moreover, we urge the Commission to strengthen age verification protocols by amending 205 CMR 248.04 to clearly state the minimum standard of reliability and accuracy for age verification that operators must implement. The standard should be consistent with the highest level of accuracy and reliability in the digital age verification industry and incorporate protections against the unauthorized use of sports betting accounts by underage users (e.g., underage use of an account of an older sibling or friend).

Finally, we encourage the Commission to review all sports wagering regulations to ensure that any provision pertaining to youth cross references both 205 CMR 250.00 (Protection of Minors and Underage Youth from Sports Wagering) and 205 CMR 150.00 (Protection of Minors and Underage Youth).

### **3. To Facilitate Safe and Responsible Gambling, App Design Should Be Carefully Scrutinized and Targeted Advertising and Communications Should Be Strictly Limited.**

Mobile sports wagering will give operators greater insight into customer behavior than ever before.<sup>9</sup> Because many of us are rarely without our smartphones, operators will have an unprecedented ability to directly reach their customers and develop and scale up their most successful engagement techniques. Engagement can immediately lead to more wagering without the “friction” associated with physically visiting a brick-and-mortar sportsbook or the exchange of money. The use of modern advertising and social media engagement technologies, in a field already associated with public health risks such as addiction, demands vigilance. Otherwise too many consumers will find their faculties to engage in responsible gaming overcome by targeted technology encouraging engagement over reasoned restraint.

The extent of personal data to which operators will have access is breathtaking. They will have data indicating where or when their customers are most likely to place bets and what may draw customers to higher-priced or riskier wagers. Operators will know their customers’ favorite teams, favorite sporting events, and favorite types and amounts of bets. Absent regulatory action, operators could conceivably leverage this data to encourage irresponsible gaming through mobile notifications and app design choices. For example, app design features or notifications may be used improperly to remind users to return to an operator’s application just as users are attempting to wean themselves from it —by, say, a reminder that a customer’s favorite team is about to take the field but the customer has not yet placed a bet.

Indeed, mobile sports betting exists within a robust industry of “Mobile App Engagement,” the goal of which is to optimize a mobile app for “engagement” by the consumer to induce them to interact with an app as much and for as long as possible.<sup>10</sup> Behavioral scientists have developed models frequently used

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<sup>8</sup> We understand from responsible gaming advocates that influencers have not been conspicuous in identifying that they are being paid by the gaming operators. On this issue, we encourage the Commission to be vigilant, and ask the operators to review closely and follow their consumer protection obligations under state and federal law.

<sup>9</sup> See *Responsible Gaming Considerations*, *supra* note 2, at 2. (“Today, it’s common practice to utilize user-specific data to curate highly targeted ads pushed out through social and digital media. The gaming industry uses additional strategies to reach and retain customers.”).

<sup>10</sup> See, e.g., Griffin Piatt, *The Ultimate Guide to Mobile App Engagement*, BRANCH.IO (Aug. 18, 2016), <https://www.branch.io/resources/blog/the-ultimate-guide-to-mobile-app-engagement/>; Todd Grennan, *Be Your Customers’ Ritual: Consistent Engagement Results in 90% Audience Retention after One Month*, BRAZE (Nov. 5, 2015), <https://www.braze.com/resources/articles/be-your-customers-ritual-consistent-engagement-results-in-90-audience-retention-after-one-month>.

to persuade people to take specific actions.<sup>11</sup> Recently, Robinhood, a consumer investing app, has come under scrutiny for the “gamification” of its app, potentially “making light of decisions involving real money” and “manipulat[ing] customers.”<sup>12</sup>

Gambling apps pose similar risks if not properly scrutinized. With mobile betting, consumers may be steered toward high-risk gaming behavior through the interface of the gaming platform itself. “A common design principle in mobile gaming and gambling is that small wins, near misses and losses encourage greater levels of engagement. Mobile games superficially appear to be relatively benign because their payoffs are often trivial, but [researchers] predict this actually makes them more addictive.”<sup>13</sup> When contrasted with regulations concerning the form and structure of physical casino games in Massachusetts,<sup>14</sup> the Commission’s regulations regarding the format and design of mobile sports betting apps are quite limited.<sup>15</sup> We urge the Commission to further study and understand the ways in which mobile sports gaming apps can be calibrated to deter, rather than further, the potential for problematic gambling behavior.<sup>16</sup> The prudence and caution we emphasize on sports wagering as a whole will require close and continuing review of operators’ application design choices.

There is one design flaw not immediately fixable by the operators themselves, but that the Commission can spur collective action to address. Specifically, the operators must allow customers to set daily, weekly, or monthly betting limits, and then require a waiting period of some time to revise those limits. But the limits do not apply across operators—so a customer using one app may just download another to circumvent the limitations. Without a process to apply the limitations across applications, they are ineffective. We understand that the operators would welcome such a process and encourage the Commission to use its authority to incent its development in the near term. If and to the extent that any such process requires navigation of customer data privacy concerns, the AGO is ready to work with you.

In addition, unless they are limited from doing so, operators may use targeted digital advertising to find and target their consumers on other online or connected platforms or to use their customers’ data to create look-alike audiences for enhanced marketing. To prevent this practice, the Commission should impose exacting regulations. Operators require certain, detailed information from each customer to operate — their birthdate, social security number, name, email, and even their location. The Commission’s sports advertising regulations should be amended to state that none of this information, shared for compliance

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<sup>11</sup> P.J. Fogg, *Fogg Behavior Model* (last visited Mar. 7, 2023), <https://behaviormodel.org/> (“[T]hree elements must converge at the same moment for a behavior to occur: Motivation, Ability, and a Prompt.”).

<sup>12</sup> Maggie Fitzgerald, *Robinhood Gets Rid of Confetti Feature Amid Scrutiny Over Gamification of Investing*, CNBC (Mar. 31, 2021), <https://www.cnbc.com/2021/03/31/robinhood-gets-rid-of-confetti-feature-amid-scrutiny-over-gamification.html>.

<sup>13</sup> Richard J.E. James *et al.*, *Gambling on Smartphones: A Study of a Potentially Addictive Behaviour in a Naturalistic Setting*, 25 EUR. ADDICTION RESEARCH 30 (Jan. 2019), available at <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC6482978>.

<sup>14</sup> See *Rules of the Game*, MASS. GAMING COMMISSION (Last accessed Mar. 7, 2023), <https://massgaming.com/regulations/table-games-rules/>.

<sup>15</sup> See *Sports Wagering Rules & Approved Events*, MASS. GAMING COMMISSION (Last accessed Mar. 7, 2023), <https://massgaming.com/about/sports-wagering-in-massachusetts/sports-wagering-rules-and-approved-events/>.

<sup>16</sup> The recent SEIGMA report highlights several suggestions. See *Potential Impacts*, *supra* note 3, at 41.

purposes, may be used to target customers (or look-alike audiences) through digital advertising.<sup>17</sup> In addition, the Commission should ask each operator to demonstrate precisely how they plan to use customers' gambling data to target them in-app (for example, by alerts) and through out-of-app digital marketing, followed by close consideration of whether their planned practices further safe and responsible gaming. At minimum, those practices should be required to include frequent and conspicuous opportunities to opt-out of future operator marketing or promotion.

Even apart from customer data, we encourage the Commission to carefully scrutinize the kinds of targeted advertising operators and their vendors intend to use, and to investigate whether their selected criteria will target individuals based on unlawful criteria or criteria already known to place an individual at high risk of problematic gambling, such as being age 25 or younger.<sup>18</sup> The Commission has demonstrated its concern in this area by proposing to prohibit the targeting with advertisements of those "potentially at-risk or problem bettors."<sup>19</sup> But that regulation will prove ineffective in time unless it is further developed in the context of advanced digital marketing and engagement techniques.

In addition, unfair and deceptive trade practices, like targeted marketing to at-risk populations, do not require proof of specific intent. It is enough that the business knew or should have known that its conduct reasonably could be perceived as unfair or deceptive. To this end, the word "intentionally" should be removed from 204 CMR 256.06(1); the phrase "in order to induce them to engage in Sports Wagering" should be removed from 205 CMR 256.04(1); and 205 CMR 256.09 should be expanded to specifically require compliance with Federal Trade Commission's Guides Concerning the Use of Endorsements and Testimonials in Advertising, 16 C.F.R. Part 255, or any later iteration.

#### **4. The Ubiquitous Use of "Experts" Paid by Operators and Promotional Inducements Should Be Closely Regulated and, In Some Cases, Prohibited.**

Among the high volume of advertisements and branded segments currently aimed at Massachusetts consumers are two that present unique risks: (a) the use of "experts" paid by the operators or their vendors

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<sup>17</sup> We acknowledge that the Commission has set limitations on the types of personally identifying information that operators may share with third parties without customer consent, including account balances, amounts of bets, and types of sporting events bet on. *See* 205 CMR 238.45(2). But the AGO believes the Commission should go further, for three reasons. First, advertising can be pushed to consumers based on information apart from what is gathered by operators while a customer is using their app. Second, advertising can be targeted based on so-called "anonymized" or "deidentified" data without disclosure of personally identifying information. Third, there are few limitations placed on the manner by which consumers can consent to the sharing of their data with third parties. Often, consent is conferred after tapping through long notices that many consumers never review, let alone read closely.

<sup>18</sup> *See Problem Gambling Factors*, RESPONSIBLE GAMBLING COUNCIL (last accessed Mar. 7, 2023), <https://www.responsiblegambling.org/for-the-public/safer-play/whos-at-risk/> ("Young adults aged 18–24 are more likely to engage in risky gambling behaviour . . . because their brains are still in development and until the age of 24 or 25 years, emotion and logic isn't fully realized. That makes good decision-making more difficult. As a result, young adults are more apt to be risk takers or to act impulsively.").

<sup>19</sup> 205 CMR 256.06(1).

to encourage certain bets that the operators, by their own odds, recognize are unlikely to be successful; and (b) a wide range of promotions targeting new customers.

***a. The practice of operators paying experts to encourage particular bets must be sharply curtailed and prohibited in certain circumstances.***

Many sports wagering operators temporarily licensed by the Commission have brought to Massachusetts the practice of using paid spokespersons to encourage wagers that the operators own odds suggest are inadvisable, using a type of marketing that appears to be without comparison in any other industry.

Let us offer an example to illustrate the practice. Certain mobile sports gaming operators sponsor segments where announcers affiliated with Boston professional sports teams suggest wagers before—and, sometimes, even during—a game, recommending that viewers place (or, at least, consider placing) a certain bet in the hope of winning much more. The resulting dynamic is one that most industries, cognizant of their obligations under consumer protection laws, would avoid entirely. On the one hand, an operator is paying a broadcasting or sports celebrity to encourage a wager. On the other hand, the operator’s very business model—and the odds associated with that particular wager—reveal the operator’s commercial judgment that the wager is somewhere between likely and overwhelmingly likely to fail. Put simply, in such a segment, the sports wagering operator is paying a spokesperson to promote a bet that, as a business matter, the operator believes the customer will lose.

It is difficult to understand how this practice comports with the Commission’s current draft regulations that prohibit advertising “reasonably . . . expected to confuse and mislead patrons in order to induce them to engage in Sports Wagering.”<sup>20</sup> Likewise, these segments appear to be an operator “advis[ing] or encourag[ing] individual patrons to place a specific wager,” which is prohibited under draft 205 CMR 256.04(4). It is our understanding, however, that the gaming operators have undertaken to comply voluntarily with the draft regulations and, therefore, must have some incorrect belief that these segments are permissible. At minimum, then, additional clarity is required to prevent this type of misleading marketing. If it is the operators’ position that their paid expert is simply entertainment, and not someone qualified to render gambling advice, a very different presentation of all material facts would be required under G.L. c. 93A and pertinent regulations.<sup>21</sup>

The use by operators of paid experts is all the more concerning where the expert is closely associated with a sports team or its broadcaster. Where, for example, a broadcaster recommends particular wagers, the public may reasonably assume that they have nonpublic information material to their betting decision (gained, for example, by their access to team practices or their ability to speak with the athletes themselves). Put plainly, operators should not be permitted to profit at all from that assumption.

Importantly, we note that these issues would become even more problematic should the Commission back away from its current (and very sound) prohibition on commission-based payments to third-party marketing vendors.<sup>22</sup> We understand certain vendors are asking for that prohibition to be lifted, which the

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<sup>20</sup> See 205 CMR 256.04(1).

<sup>21</sup> See 940 CMR 3.00, *et seq.*

<sup>22</sup> See 205 CMR 256.01(3).

Commission is considering on an interim basis.<sup>23</sup> The fact is that certain third-party marketing vendors present themselves to the public as tip sheets, providing advice on prospective wagers. Where a vendor expressly or impliedly advises a particular wager, that vendor must not be compensated based on whether its audience then uses or accesses a sports wagering operator’s site or app to make the bet it has advised.

***b. Promotions Should Be Vetted Before They Are Widely Used & Their Cost Must Not Be Subsidized by Massachusetts Taxpayers.***

If their recent advertisements are any guide, the operators are planning to tie the debut of mobile sports wagering in the state to any number of promotions. Certain promotions grant would-be customers free money or credit to wager. Others, however, act as insurance for a customer’s first tranche of bets, thereby ensuring that the downside typically associated with gambling (i.e., losing money) is mitigated for the customer’s first series of bets. Before allowing such a promotion, the Commission should undertake to understand why it has been structured this way, using the operators’ own data. It should also hear from the operator as to why the promotion is consistent the prohibition on advertising that “impl[ies] or promote[s] Sports Wagering as free of risk.”<sup>24</sup>

In addition, it appears that multiple operators intend to offer referral bonuses, such that one customer may receive credits for the referral of others. These types of promotions, which encourage consumers to leverage their social networks for referral bonuses, are not permitted in other industries with considerable public health externalities—like the sale of alcohol or recreational marijuana—and they should not be permitted here.

If and to the extent that the Commission determines certain promotional incentives are consistent with safe and responsible gaming, the cost of those promotions should not be used by the operators to offset their gaming revenues. The people of the Commonwealth certainly did not intend to provide a tax subsidy for gambling giveaways.

**5. Gaming Operators Should Be Required to Use the Data Collected About Customer Behavior to Identify and Intervene with Problem Gamers.**

The “prevalence of problem gambling among . . . sports bettors” is “significantly higher” than other forms of gaming.<sup>25</sup> Online gambling platforms, with their increased convenience, availability, speed and ease of bets and spending, and which can be used alone and without the presence of others, have the possibility to exacerbate problematic gambling behavior.<sup>26</sup> Without adequate controls, this unprecedented access to gambling may result in wide-ranging harm that is difficult to address after the fact.<sup>27</sup>

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<sup>23</sup> See Colin A. Young, *Regulators Eye Relaxed Sports Betting Marketing Rules*, STATE HOUSE NEWS SERVICE (Feb. 28, 2022).

<sup>24</sup> 205 CMR 256.04(6)(c).

<sup>25</sup> *Potential Impacts*, *supra* note 3, at 26.

<sup>26</sup> See, e.g., Hing et. al, *How Structural Changes in Online Gambling Are Shaping the Contemporary Experiences and Behaviours of Online Gamblers: An Interview Study*, 22 BMC PUBLIC HEALTH 1620 (2022), available at <https://bmcpublihealth.biomedcentral.com/articles/10.1186/s12889-022-14019-6>.

<sup>27</sup> See Lia Nower, *Data From New Jersey Is a Warning Sign for Young Sports Bettors*, N.J. MONITOR, (February 12, 2023), <https://newjerseymonitor.com/2023/02/12/data-from-new-jersey-is-a-warning-sign-for-young-sports-bettors/>; see also *Responsible Gaming Considerations*, *supra* note 2, at 4–5.



For the reasons canvassed above, mobile betting operators and their marketing partners will have the best access to information concerning the propensities of their users, including those on the verge of addiction. And that information is unique. The individualized experience of wagering on a smart phone makes it easier to shield that addiction from others and for it to deepen in isolation. So, with the operators' access to information comes a responsibility to use it in furtherance of safe, responsible sports wagering. In the near term, the Commission should work with operators to establish indicia of high-risk behavior; to establish appropriate monitoring of those indicia; to share with the Commission anonymized data concerning when the indicia are met; and to establish appropriate operator-driven interventions to stem and mitigate high-risk consumer behavior. Other states—including New Jersey, which has the longest experience with sports wagering in the country—recently have enacted these types of requirements.<sup>28</sup>

Simply put, where (a) the operators themselves have the best data to identify and curb problem gambling; and (b) have the tools to interrupt that gambling before customers harm themselves or their families, the operators must be obligated to do just that. And the Commission should be vigilant in ensuring the obligation is met.

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The Attorney General's Office appreciates the opportunity to offer these comments to the Commission regarding mobile sports wagering. Digital access to sports betting represents a significant shift in the Massachusetts gambling industry, with faster and easier access than ever before. In this context, safety and responsibility demands prudence and caution. The AGO stands ready to support and partner with the Commission to root out and address any unlawful practices that negatively affect the people of the Commonwealth. We encourage the Commission to implement the suggestions offered here as an important first step in that effort.

Respectfully submitted,



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<sup>28</sup> See, e.g., *Division of Gaming Enforcement Begins Using Data on Players' Online Betting Behavior to Identify and Assist Gamblers at Risk of Addiction*, N.J. DEPT. OF LAW AND PUB. SAFETY (February 7, 2023), <https://www.njoag.gov/division-of-gaming-enforcement-begins-using-data-on-players-online-betting-behavior-to-identify-and-assist-gamblers-at-risk-of-addiction/>.