



**GOVERNMENT OF THE DISTRICT OF COLUMBIA**  
**Office of the Chief Financial Officer**  
**Office of Lottery and Gaming**



**EXECUTIVE DIRECTOR ORDER**

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**Order Number:** 20-S-005  
**Subject:** Mobile and Internet Based Sports Wagering Geofencing Enforcement Standards  
**Issue Date:** February 14, 2020  
**Effective Date:** February 14, 2020  
**Authority:** D. C. Official Code §§ 36-601.06; 621.01, 621.02; 621.06(e); and 30 DCMR § 2120  
**Supersedes:** N/A

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- (1) To account for slight variances in location data and accuracy, the Office of Lottery and Gaming (Office) will allow for and test against the following enforcement tolerances:
  - (a) For sports wagering conducted by Class A Operators or the District over the internet or through mobile applications, one hundred (100) meters beyond their respective inclusion zones boundaries.
  - (b) Notwithstanding anything to the contrary contained in the forgoing, sports wagering conducted by a Class A Operator over the internet or through mobile applications may not function within the physical confines of a different Class A Operator's designated facility. Additionally, sports wagering conducted by the District over the internet or through mobile applications may not function within the physical confines of any Class A Operator's designated facility.
- (2) The Office hereby implements a zero (0) meter buffer zone around restricted areas located within the District of Columbia where sports wagering may not be conducted pursuant to federal law.
- (3) The Office hereby implements the following buffer zones around the boundaries of the District of Columbia:
  - (a) A three hundred (300) meter buffer zone for sports wagering transactions where the location of the person making the wager can be identified through Wi-Fi by the geolocation system;
  - (b) A fifty (50) meter buffer zone for sports wagering transactions where the location of the person making the wager can be identified through GPS by the geolocation system.

- (4) The accuracy radius of the location data source used to verify the location of the person attempting to place a wager is not permitted to overlap nor exceed defined buffer zones, or the permitted boundary as outlined above.
- (5) This Executive Director Order may be modified based on the collection of additional data and as technology advancements become available.

ISSUED this 14<sup>th</sup> day of February, 2020



Beth Bresnahan

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**Executive Director**