

# REMOTE IDENTITY VERIFICATION FOR CASHLESS WAGERING ACCOUNTS IN NEVADA

By Karl Rutledge and Glenn Light and Salma Granich on 11/22/2021  
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On Thursday, November 19th, 2021, the Gaming Control Board (“Board”) held a public workshop to discuss possible amendments to the Nevada Gaming Commission regulations regarding remote registration for wagering accounts used for other than sports, nonpartimutuel race, or “other event” wagering. The workshop did not cover remote registration for sports and horse wagering accounts. A payment processor requested such a workshop in order to amend Regulation 5.225 to allow for remote patron identification verification for their cashless wagering account systems.

Proponents of such a measure argued that with the increase of cashless payment systems being implemented in casinos throughout Nevada, allowing remote registration would be optimal for the industry and its patrons. Currently, with such cashless payment systems, a patron spends anywhere from ten minutes to two hours filling out the proper forms, verifying their personal information at a casino which requires cage personnel to view a government issued ID. With the current state of shortage of employees, from the user’s perspective, the experience can lead to extended wait times and long lines at casinos in order to enroll in such accounts. By allowing a patron to submit their verification documents online, as is already allowed for online poker, patrons would be encouraged to go to the casino to freely play without any interference.

In contrast, opponents of such online verification measures argue that according to the Financial Crimes Enforcement Network (“FinCEN”), it violates anti-money laundering federal laws that require in-person validation of a government issued ID in order to conduct a terrestrial casino transaction. However, similar verification systems are currently being used in other state and tribal jurisdictions without intervention from FinCEN.

Board members seemed supportive of the concept, albeit with the opportunity to internally tweak the language further and bring such amendments back for consideration in a regular Board meeting in the future.

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