

**STATE OF ILLINOIS  
ILLINOIS GAMING BOARD**

**RULE 1900.1170(j) ORDER**

**MARCH 27, 2026**

*In re PointsBet Illinois, LLC  
d/b/a Fanatics Sportsbook  
November 2025 Voided Wagers*

**ORDER**

This matter comes before the Illinois Gaming Board (the “IGB” or “Board”) under Section 1900.1170 (“Cancelled or Void Wagers”) of the IGB’s Adopted Rules for Sports Wagering (the “Rules”). 11 Ill. Adm. Code 1900.1170. This Order issues under Rule 1170(j). 11 Ill. Adm. Code 1900.1170(j).

**I. SUMMARY**

This matter arises out of a series of wagers placed in Illinois sportsbook patron Steven Levian’s (“Levian”) account with PointsBet, LLC d/b/a Fanatics Sportsbook (“Fanatics”) that Fanatics voided. Levian challenges Fanatics’ decision to void the subject wagers and seeks an order from the IGB directing Fanatics to honor them.

On December 2, 2025, Fanatics notified the IGB of its intent to void a series of wagers placed in Levian’s account between the dates of November 20 and November 29, 2025. Fanatics sought to void the subject wagers based on its belief that multiple individuals could be improperly accessing Levian’s account. Specifically, Fanatics believed that wagers were being placed either on behalf of a prohibited person or by a person not authorized to access Levian’s account. Fanatics subsequently voided the wagers on or about December 15, 2025 pursuant to Rule 1120(g). On January 8, 2026, Levian submitted a request to the IGB seeking IGB review of the voided wagers.

For the reasons discussed below, and based on the record before the IGB, a reasonable basis exists for Fanatics to have believed at the time that the subject wagers were proxy bets invalidly placed in Levian’s account. Accordingly, Levian’s request for an order directing Fanatics to honor the subject wagers is denied and the subject wagers remain void.

**II. RELEVANT FACTUAL BACKGROUND**

Fanatics is a Management Services Provider Licensee. At all relevant times, Fanatics was conducting the online sports wagering operation on behalf of Master Sports Wagering Licensee Hawthorne Race Course, Inc.

On November 20, 2025, a user logged into Levian’s account from Great Neck, New York and made an online banking deposit at 7:01 PM EST using an iPhone 16 Pro. Approximately 125 minutes later, a user logged into Levian’s account from downtown Chicago, Illinois and placed a wager using an iPhone 13. Great Neck is located on Long Island, approximately one hour’s drive from both John F. Kennedy International Airport and LaGuardia Airport. An average flight from New York to Chicago is approximately two hours and 30 minutes in duration. Depending on mode of transportation and time of day, travel from either Midway International Airport or O’Hare International Airport to downtown Chicago takes at least 30 to 40 minutes.

Between November 20 and November 29, 2025, 39 separate wagers in Levian’s account were placed before a user placed a wager \$15,000 greater in stake than any prior wager placed in the account. Fanatics subsequently suspended the account and conducted a suspicious activity review, identifying the discrepancy between devices and user locations on November 20.

On December 2, 2025, Fanatics contacted IGB staff regarding its discovery and shared the relevant information in its possession about the activity in Levian’s account. After discussion with IGB staff, Fanatics voided all wagers made in the account subsequent to the initial deposit on November 20, under the belief it evidenced proxy betting on behalf of an individual outside the State of Illinois.

On January 8, 2026, Levian contacted the IGB to challenge the voided wagers. Levian volunteered that while he was physically present in Illinois, his wife accessed his account from a different device in New York. Levian’s complaint constitutes a Rule 1170(j) Request for review of Fanatics’ determination to void the subject wagers.

### **III. DISCUSSION**

Our analysis necessarily begins with the Sports Wagering Act (the “Act”) and IGB Rules regarding sports wagering accounts, multiple party access, and out of state individuals. The Act permits the conduct of online sports wagering by means of a sports wagering account. It defines a “sports wagering account” as “a financial record established by a master sports wagering licensee *for an individual patron* in which the patron may deposit and withdraw funds for sports wagering and other authorized purchases and to which the master sports wagering licensee may credit winnings or other amounts due to that patron or authorized by that patron.” 230 ILCS 45/25-10 (emphasis added). Under IGB Rules, a sports wagering account is intended for a single patron and is non-transferable. 11 Ill. Adm. Code 1900.1220(c).

The Fanatics Terms of Service reiterates these restrictions. These Terms state in part, “[w]hen You use the Platform to engage in sports wagering, You are further representing and warranting that all of the following are true: . . . You are not placing a wager, logging into an Account, or depositing or withdrawing funds as an agent or proxy[.]” Terms of Service – Fanatics Sportsbook Illinois, Section 2A.

Additionally, a sports wagering licensee under the Act, like Fanatics, may only accept a wager from a person physically located in the State of Illinois. 230 ILCS 45/25-25. Wagering on behalf of an individual located outside Illinois is prohibited. 11 Adm. Code 1900.1120(a)(1); (b)(6).

IGB Rules provide that any wager that was prohibited at the time it was made shall be deemed void. 11 Ill. Adm. Code 1900.1120(g). The Act requires licensees to make commercially reasonable efforts to notify the IGB of any information relating to suspicious or abnormal wagering activities. 230 ILCS 45/25-15(h). Suspicious wagering activity includes any activity that may be indicative of prohibited or illegal activity. 11 Ill. Adm. Code 1900.120. Abnormal wagering activity may include increased size of a patron's wagers. *Id.* Licensees are required to implement methods and procedures to detect and document suspicious wagering activities. 11 Ill. Adm. Code 1900.1150(f).

Sports Wagering Rule 1170(j) allows a patron, like Levian, to ask the IGB Administrator to review any wager voided by a sports wagering operator. If the Administrator concludes there is no reasonable basis to believe there were grounds to void the wager, the Administrator may order the sports wagering operator to honor the wager. To evaluate Levian's pending Rule 1170(j) Request, IGB staff spoke with Levian and Fanatics representatives and reviewed internal Fanatics records. Fanatics cooperated with all IGB requests and directives.

In this case, Fanatics detected abnormal wagering activity when a user placed a wager in Levian's account at a significantly higher stake than prior wagers. Fanatics subsequently conducted a review of the Illinois deposit and wagering activities over a nine-day period for Levian's account, and identified additional suspicious activity. Namely, Fanatics found evidence that two different individuals were believed to have accessed Levian's account. The geolocation of the two different devices used to make a deposit to the account from Great Neck, New York and then subsequently place a wager in the account from Chicago only two hours later established that two different individuals were accessing Levian's account.

Levian does not deny these facts. He acknowledges that his wife accessed his account from a device he owned in New York while he himself was in Illinois, for the purpose of depositing money into the account. He states that his wife acted with his authorization because he was having difficulty making deposits himself while he was in Illinois. We accept Levian's statements as true for purposes of this Rule 1170 Order.

However, the standard of review under Rule 1170(j) is not based on whether Levian or his wife engaged in improper or illegal behavior. Instead, the applicable question is whether, based on the information that Fanatics had available to it at the time, the decision by Fanatics to void the subject wagers was reasonable under the circumstances. The Sports Wagering Act and regulatory scheme both require that sports wagering accounts are for individual use only. Regulations specifically consider transferring accounts or proxy wagering as prohibited behaviors. Sports wagering operators are required to be on the lookout and to take proactive steps to detect and prevent prohibited behaviors, including proxy wagering. 11 Ill. Adm. Code 1900.1210(c). Based on the information available to Fanatics, it was reasonable to believe that prohibited conduct may have occurred or may have been occurring through Levian's account and to void the subject wagers on that basis.

In Illinois, sports wagering licensees must take steps to proactively detect, prevent, and report suspicious, prohibited or illegal activities in a timely manner. The IGB recognizes that licensees can act only with the information and resources available to them at the time when a decision

must be made. The true nature and purpose of Levian and his wife's actions in the account in connection with the November 20, 2025 deposit and subject wagers are wholly irrelevant for purposes of IGB review of Fanatics' decision to void the wagers. Again, the only question is whether Fanatics' actions were reasonable in light of the prohibitions throughout the Act and Rules and the information available to Fanatics when it decided to void the wagers. Based on the uncontroverted evidence, Fanatics' decision to void the subject wagers was reasonable under the circumstances and consistent with Fanatics' obligations under the Act and IGB Rules.

#### **IV. CONCLUSION**

For the reasons discussed above, Fanatics had reasonable basis to believe the deposit and wagering activity associated with this account between November 20 and November 29, 2025 were evidence of prohibited wagering activity. Therefore, Levian's Request under 11 Ill. Adm. Code 1900.1170(j) is hereby **DENIED**.

**Entered: March 27, 2026**

A handwritten signature in blue ink, appearing to read "Marcus D. Fruchter", written over a horizontal line.

**Marcus D. Fruchter**  
**Administrator**  
**Illinois Gaming Board**