New Jersey (USA)

Online casino launch roadmap

Division of Gaming Enforcement (DGE), with the Casino Control Commission (CCC)

You cannot hold a licence yourself: an Atlantic City casino holds the Internet gaming permit, you run the platform as its affiliate, and your primary servers live in Atlantic City.

- Recommended path
- Optional, worth it
- Alternative route

LICENCE	TIME TO LAUNCH	GAMING TAX	SETUP COST	LOCAL PRESENCE	DIFFICULTY
Internet gaming permit held by an Atlantic City casino…	12-18 months from first filing (book estimate; the…	19.75% of Internet gaming gross revenue since July 1…	USD 1.5M-2.2M (book estimate) plus in-state…	Primary gaming equipment must sit in Atlantic City…	Very high

STAGE 1 · Weeks 0-8 — Market and legal feasibility

- Pick the skin route first — 1.1
- Check whether the state is worth it — 1.3
- Model the 19.75% tax and partner share — 1.2
- Supplier-only alternative — 1.4

STAGE 2 · Months 1-12 — Partner, entity and licensing

- Partner agreement and revenue share — 2.1
- Permit and licensing fees — 2.3
- Corporate structure for vetting — 2.5
- Transactional waiver from the CCC — 2.2
- Principal and key employee checks — 2.4

STAGE 3 · Months 3-12 — Platform, hosting and suppliers

- Servers in Atlantic City — 3.1
- Game content and supplier registration — 3.3
- Independent security assessment — 3.5
- Hardware, hub-and-spoke network design — 3.2
- RNG and game math — 3.4

STAGE 4 · Months 6-12 — Player compliance controls

- Identity, age 21 and account rules — 4.1
- Responsible gaming tools — 4.3
- Geolocation on every session — 4.2
- AML and fraud monitoring — 4.4

STAGE 5 · Months 6-12 — Payments and treasury

- Player funds segregation — 5.1
- Tax remittance and reporting — 5.3
- Deposit and withdrawal methods — 5.2
- Chargebacks and disputes — 5.4

STAGE 6 · Months 9-14 — Certification and testing

- Lab testing: DGE rules and GLI-19 — 6.1
- Logging and reporting evidence — 6.3
- Internal controls submission — 6.2
- Pre-launch controlled testing — 6.4

STAGE 7 · Months 12-18 — Go-live

- DGE launch authorization — 7.1
- Marketing and promotions review — 7.3
- Operational readiness — 7.2

STAGE 8 · After launch — Ongoing obligations

- Permit renewal and fees — 8.1
- Change control for games and platform — 8.3
- Regulatory reporting and audits — 8.2
- Incident response and breach reporting — 8.4

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New Jersey (USA): launch roadmap in detail

Division of Gaming Enforcement (DGE), with the Casino Control Commission (CCC) · as of 2026-11

Licence	Internet gaming permit held by an Atlantic City casino licensee; you operate as its Internet gaming affiliate or platform supplier
Time to launch	12-18 months from first filing (book estimate; the DGE background investigation sets the pace)
Gaming tax	19.75% of Internet gaming gross revenue since July 1, 2025 (P.L. 2025, c.66), up from 15%; DGE monthly reports also show a separate 2.5% Investment Alternative Tax line
Setup cost	USD 1.5M-2.2M (book estimate) plus in-state hardware; permit fees are a small part
Local presence	Primary gaming equipment must sit in Atlantic City (N.J.A.C. 13:69O-1.2); patrons must be inside New Jersey
Difficulty	Very high

1. Market and legal feasibility Weeks 0-8

1.1 Pick the skin route first RECOMMENDED

Only Atlantic City casino licensees can hold an Internet gaming permit. The practical path is a commercial agreement with one of them, so you appear as its Internet gaming affiliate or technology supplier. Start with partner selection, because the partner's own regulatory standing and appetite for DGE scrutiny decide your timeline.

In the book: Ch. 06 Licensing Guide, Ch. 07 Casino Implementation Planning and Timeline

1.2 Model the 19.75% tax and partner share RECOMMENDED

The state tax rose from 15% to 19.75% of Internet gaming gross revenue on July 1, 2025, and DGE reports show a separate 2.5% Investment Alternative Tax. Your partner will also take a revenue share, so the margin math must be done after tax, after share, and after in-state hosting costs. Re-check the rate before you sign, since New Jersey has changed it once already.

In the book: Ch. 15 Casino Mathematics and Game Economy, Ch. 30 FinOps Deep Dive, Ch. 36 Financial Operations

1.3 Check whether the state is worth it OPTIONAL

New Jersey is a mature, crowded market with a small population. If you have no existing brand or player base, compare it against Michigan and Pennsylvania, which have different partner economics. A B2B supplier role under an existing operator is cheaper than becoming a new brand.

In the book: Ch. 03 Global Market Analysis, Ch. 04 Market Analysis and Industry Players

1.4 Supplier-only alternative ALTERNATIVE

If you build games or platform components but do not want to be the brand, license as a casino service industry vendor and sell to existing permit holders. You still go through DGE vetting and lab testing, but you avoid the operator-side obligations and the 12-18 month brand launch.

In the book: Ch. 10b Supplier Integration Control Plane, Ch. 47d Casino as a Service: White-Label Provisioning at the Press of a Button

2. Partner, entity and licensing Months 1-12

2.1 Partner agreement and revenue share RECOMMENDED

The casino licensee carries the permit and the regulatory liability, so the contract must cover who controls the player funds, who answers to DGE, audit rights, termination, and what happens to player balances if the relationship ends. Have New Jersey gaming counsel draft it, not a generic commercial lawyer.

In the book: Ch. 09 Legal Framework and Contracts, Ch. 06 Licensing Guide

2.2 Transactional waiver from the CCC RECOMMENDED

A casino licensee that deals with an unlicensed or unqualified entity needs a transactional waiver from the Casino Control Commission. The CCC publishes the grants in its twice-monthly rulings, for example waivers for Ocean with RW Bet and Playstar NJ in 2026. Build the waiver request into the partner plan; it is a gating item, not a formality.

In the book: Ch. 06 Licensing Guide

2.3 Permit and licensing fees RECOMMENDED

N.J.A.C. 13:69A-9.4 requires a nonrefundable USD 100,000 deposit with each permit application, an initial Internet gaming permit fee of not less than USD 400,000 in the regulation text, USD 250,000 for renewal, and a separate USD 250,000 Responsible Internet Gaming Fee at initial filing and each renewal. DGE's own draft fee schedule lists different figures for some lines, so confirm the current amounts with DGE before budgeting. These fees fall on the casino partner, and the contract usually decides who pays.

In the book: Ch. 06 Licensing Guide

2.4 Principal and key employee checks RECOMMENDED

DGE investigates principals, significant shareholders, key employees and sources of funds, and the affiliate itself must be licensed or qualified in the class DGE assigns (ask DGE which class applies to your role). Start personal disclosure packages early. Missing tax records, old company filings and foreign entities are what stretch this to a year or more.

In the book: Ch. 06 Licensing Guide, Ch. 07 Casino Implementation Planning and Timeline

2.5 Corporate structure for vetting OPTIONAL

Keep the ownership chain simple and documented before you file. Holding companies with offshore layers create extra disclosure work for every beneficial owner. A clean New Jersey or Delaware entity for the US operation helps.

In the book: Ch. 09 Legal Framework and Contracts

3. Platform, hosting and suppliers Months 3-12

3.1 Servers in Atlantic City RECOMMENDED

N.J.A.C. 13:69O-1.2 puts primary gaming equipment in a restricted area of the casino hotel, or in another secure facility owned or leased by the casino licensee, inside Atlantic City limits. Backup equipment has separate rules, including a time-limited allowance and approved secure facilities in Atlantic City. Do not generalize the rule to every ancillary system: DGE classifies equipment, and non-gaming components may sit elsewhere in New Jersey with approval.

In the book: Ch. 29a On-Premises Infrastructure for US-Regulated iGaming, Ch. 29b Datacenter Infrastructure for Regulated Gaming, Ch. 27 Data Residency and Backup/Recovery

3.2 Hardware, hub-and-spoke network design RECOMMENDED

Design the Atlantic City cage as a spoke that holds the game servers, RNG, player account and ledger, while edge, CDN and analytics stay in a normal cloud region where the rules allow. DGE can inspect racks and compare serial numbers against your filing, so keep an exact asset inventory and change log.

In the book: Ch. 29a On-Premises Infrastructure for US-Regulated iGaming, Ch. 27c Migrating a Single-Jurisdiction Casino Platform to Hub & Spoke, Ch. 38 Case Study -- On-Premises to Cloud Migration

3.3 Game content and supplier registration RECOMMENDED

Every game studio and platform component supplier needs the DGE approvals that apply to its role, and each game must be tested and approved before release. Put approval status, game versions and RTP into one supplier control plane so you can answer DGE on any build.

In the book: Ch. 10b Supplier Integration Control Plane, Ch. 17 Random Number Generation (RNG), Ch. 15 Casino Mathematics and Game Economy

3.4 RNG and game math RECOMMENDED

RNG output and game math are tested by an approved independent test laboratory against DGE technical rules and GLI-19. Keep seed handling, scaling and shuffle logic documented for the lab.

In the book: Ch. 17 Random Number Generation (RNG), Ch. 15 Casino Mathematics and Game Economy, Ch. 25 GLI-GSF Compliance Framework: Online Gaming Information Security

3.5 Independent security assessment RECOMMENDED

13:69O requires an integrity and security assessment of the Internet gaming system by an independent professional selected by the permit holder and approved by DGE, with the report filed with the Division. Budget for it as a launch gate and repeat it on the cadence DGE sets.

In the book: Ch. 24 Security and Compliance, Ch. 23 DevSecOps for iGaming, Ch. 25 GLI-GSF Compliance Framework: Online Gaming Information Security

4. Player compliance controls Months 6-12

4.1 Identity, age 21 and account rules RECOMMENDED

13:69O-1.3 sets the account opening rules: verify the patron is 21 or older, is not self-excluded, and is identified from the data DGE specifies before play. Store the evidence in a form you can hand to DGE on request, and keep retention and access controls tight.

In the book: Ch. 24d KYC Evidence Lifecycle, Ch. 24 Security and Compliance

4.2 Geolocation on every session RECOMMENDED

Internet gaming may only occur within New Jersey unless a reciprocal agreement says otherwise (13:69O-2.1). Check location before play and during play. GeoComply is the dominant vendor. Plan for border towns, VPNs, spoofed GPS and proxy betting, and keep your own rejection analytics.

In the book: Ch. 24e Geofencing and Location Verification, Ch. 27b The Jurisdiction Transfer Gateway and Cookie Consent, Ch. 19 Anti-Fraud System Deep Dive

4.3 Responsible gaming tools RECOMMENDED

Patrons must be able to set limits and self-exclude, and the rules require a cooling-off option of not less than 72 hours. New Jersey has a general self-exclusion list and an Internet self-exclusion list, and your platform must screen against both. Late list updates have led to fines for operators.

In the book: Ch. 26 Responsible Gaming and Player Protection Systems, Ch. 26b Self-Exclusion Registries: From API to Audit Trail

4.4 AML and fraud monitoring RECOMMENDED

Licensed operators are covered by the Bank Secrecy Act and need an AML program with suspicious activity reporting and currency transaction reporting. Run the same patterns you would for any US market: structuring, rapid in-and-out, multi-account and mule behavior.

In the book: Ch. 19 Anti-Fraud System Deep Dive, Ch. 24 Security and Compliance, Ch. 33 Operational Playbooks

5. Payments and treasury Months 6-12

5.1 Player funds segregation RECOMMENDED

The rules require that player funds held in Internet gaming accounts be reconciled against an independent account, with the reconciliation reports the rules list. Build ledger reconciliation as a first-class system, and agree with your partner who holds the bank account.

In the book: Ch. 36 Financial Operations, Ch. 36b The Financial Truth Layer -- Ledger, Treasury, and Reconciliation

5.2 Deposit and withdrawal methods RECOMMENDED

Cards, ACH, PayPal, online banking and cash at the cage are the common set. Card issuers sometimes decline gambling merchant codes, so build retry and alternative method flows. Keep crypto out of scope for New Jersey.

In the book: Ch. 36 Financial Operations, Ch. 33d Disputes, Chargebacks, and Player Support

5.3 Tax remittance and reporting RECOMMENDED

Gross revenue tax is paid by the casino licensee, so your platform has to feed it exact, reconcilable daily and monthly revenue data. Align your revenue definitions with DGE's reporting forms from day one.

In the book: Ch. 25b Regulatory Reporting and Evidence Export, Ch. 36b The Financial Truth Layer -- Ledger, Treasury, and Reconciliation

5.4 Chargebacks and disputes OPTIONAL

Set up dispute handling that can pull game logs and account history quickly. The Division handles patron complaints, and you will be asked for evidence.

In the book: Ch. 33d Disputes, Chargebacks, and Player Support

6. Certification and testing Months 9-14

6.1 Lab testing: DGE rules and GLI-19 RECOMMENDED

Submit the Internet gaming system, games and RNG to an independent test lab recognized by DGE. GLI is the most common choice. The lab certifies against the DGE technical rules in 13:69O and the standards DGE adopts, and DGE then issues its own approval. Expect rework cycles.

In the book: Ch. 25 GLI-GSF Compliance Framework: Online Gaming Information Security, Ch. 17 Random Number Generation (RNG), Ch. 32 Testing and QA in Gambling

6.2 Internal controls submission RECOMMENDED

DGE reviews written internal controls covering accounts, game operations, logging, reporting and test accounts. Write them from your real workflows, not templates, because inspectors compare them to what the system does.

In the book: Ch. 25 GLI-GSF Compliance Framework: Online Gaming Information Security, Ch. 24 Security and Compliance

6.3 Logging and reporting evidence RECOMMENDED

13:69O-1.8 requires mandatory gaming system logging and 13:69O-1.9 lists required reports and reconciliation. Build an export pipeline that can reproduce any player session for DGE.

In the book: Ch. 25b Regulatory Reporting and Evidence Export, Ch. 24b Wazuh SIEM for iGaming Compliance

6.4 Pre-launch controlled testing RECOMMENDED

Expect DGE to want controlled testing with test accounts (13:69O-1.9 covers test accounts) before full go-live; confirm the exact trial format with your DGE contact. Run load, failover and geolocation tests during this window.

In the book: Ch. 32 Testing and QA in Gambling, Ch. 31 Performance Benchmarks and Metrics

7. Go-live Months 12-18

7.1 DGE launch authorization RECOMMENDED

Go-live needs written DGE authorization for the platform and each game set, and the partner must be in good standing. Plan the launch for a quiet week, with the whole compliance team available.

In the book: Ch. 07 Casino Implementation Planning and Timeline, Ch. 40 Case Study -- Launching in a New Regulated Market

7.2 Operational readiness RECOMMENDED

Support, fraud, RG and payment teams need playbooks, shift cover and escalation paths before the first player signs up. Test your incident process against a geolocation vendor outage and a self-exclusion list sync failure.

In the book: Ch. 08 Team Structure and Operations, Ch. 33 Operational Playbooks, Ch. 35 Incident Management

7.3 Marketing and promotions review RECOMMENDED

Advertising and bonus terms are regulated, and the partner is liable for them. Get promotional terms and affiliate arrangements reviewed before launch.

In the book: Ch. 37 Marketing Technology and CRM Systems, Ch. 09 Legal Framework and Contracts

8. Ongoing obligations After launch

8.1 Permit renewal and fees RECOMMENDED

The permit renews with a fee and a new USD 250,000 Responsible Internet Gaming Fee. Keep key employee and ownership changes reported as they happen.

In the book: Ch. 06 Licensing Guide

8.2 Regulatory reporting and audits RECOMMENDED

Monthly revenue and tax reporting, periodic security assessments and unannounced inspections are routine. Keep evidence exportable and retention policies written.

In the book: Ch. 25b Regulatory Reporting and Evidence Export, Ch. 27 Data Residency and Backup/Recovery

8.3 Change control for games and platform RECOMMENDED

New games, major platform releases and infrastructure changes in Atlantic City need DGE notice or approval. Tie your release process to the approval register.

In the book: Ch. 10b Supplier Integration Control Plane, Ch. 23b DevSecOps Pipeline Implementation: From GitHub Actions to Self-Hosted GitLab CI, Ch. 25 GLI-GSF Compliance Framework: Online Gaming Information Security

8.4 Incident response and breach reporting RECOMMENDED

Have a tested plan for security incidents, outages and suspected integrity events, including regulator notice timelines in your internal controls.

In the book: Ch. 35 Incident Management, Ch. 35b Cash-Flow Integrity Incident Response, Ch. 39 Case Study -- Security Incident Response

Common pitfalls

- Treating the Atlantic City server rule as optional or as satisfied by a cloud region. Primary gaming equipment must be in Atlantic City.
- Over-reading the rule the other way and moving every ancillary or backup system into Atlantic City. DGE classifies equipment and approves the placement of the rest.
- Signing a partner agreement before checking the partner's own regulatory standing and whether the CCC transactional waiver is realistic.
- Budgeting from old numbers. The Internet gaming tax went from 15% to 19.75% in July 2025, and fee lines differ between the regulation text and DGE's draft schedule.
- Slow or incomplete personal disclosure for principals and investors. This, not the tech, is what pushes timelines past 12 months.

- Late syncs of the self-exclusion lists. Operators have been fined for delayed list updates.
- Relying on a single geolocation check at login. Rules expect location confidence during play, and proxy betting is a known problem.
- Rack and serial number drift. DGE inspectors compare hardware on site against your filing.

Sources

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3. DGE fee schedule (draft, June 2025)
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4. P.L. 2025, c.66 (Internet gaming tax to 19.75%)
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5. DGE monthly gaming revenue report, June 2026
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6. CCC rulings summary, Oct 16-31 2026 (transactional waivers)
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