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August 5, 2025

The Honorable Pamela Bondi
United States Attorney General
United States Department of Justice
950 Pennsylvania Avenue NW
Washington, D.C. 20530

Submitted via email

Dear Attorney General Bondi:

We, the undersigned State Attorneys General, write to request assistance from the United States Department of Justice ("USDOJ") to address the rampant spread of illegal offshore gaming operations across the United States. Our States have heard reports concerning growth in the illicit offshore gambling markets that could be harming our citizens. While we as States do all we can to protect our citizens, such unlawful enterprises undermine the rule of law, threaten consumer protection, and deprive our States of significant tax revenues and economic benefits. We seek the USDOJ's cooperation in ensuring these companies are brought to justice to the fullest extent available under state and federal law, both criminal and civil, for any potential violations.

Background of Illegal Offshore Gaming

Illegal online sports betting and gaming operations—largely run by massive, foreign-based companies—reportedly pervade our jurisdictions. These offshore entities routinely operate without proper licensure, offer limited or non-existent consumer protections, fail to verify user age, ignore state boundaries, and evade taxation obligations potentially to both the Internal Revenue Service and our States.

These unlawful platforms expose residents—particularly young people and vulnerable adults—to fraudulent schemes and highly addictive gambling without any oversight or accountability. Moreover, these

operations undercut state-regulated markets and have been linked to money laundering, human trafficking, and other nefarious conduct.

Recent estimates show that the volume of illegal online gaming exceeds more than \$400 billion annually, leading to more than \$4 billion in lost tax revenue for state governments.¹ Despite these staggering figures, enforcement has been scarce, only emboldening these illegal operators.

A Path Forward: Joint USDOJ and AG Enforcement of Federal Law

Since 2013, USDOJ enforcement actions against illegal offshore gambling sites have been extremely limited. We seek USDOJ's cooperation and coordination to deploy robust legal tools to curb these unlawful enterprises. For instance, under the Unlawful Internet Gambling Enforcement Act, USDOJ can pursue injunctive relief to block access to illegal websites and payment processing mechanisms. See 31 U.S.C. § 5365(b). Additionally, under 18 U.S.C. § 1955(d), USDOJ has the authority to seize assets—including servers, domains, and proceeds—that illegal gambling operations use. Because the websites owned by unlawful offshore operations violate federal law, USDOJ can and should seize the websites and domain names of operators and retain any proceeds recovered as part of the seizure.

USDOJ has used its authority to seize online assets in analogous cases. On "Black Friday" in 2011, it seized websites, servers, and domain names of companies that sold counterfeit products.² In April 2024, the USDOJ successfully seized domains connected to a Russian cybercrime network engaged in large-scale identity theft and fraud.³ Those same mechanisms can and should be applied to illegal offshore gaming platforms.

Furthermore, the USDOJ and our offices should work in partnership with major payment processors to implement a national enforcement and compliance strategy to cut off access to the U.S. financial system. Both Visa and Mastercard have already signaled their willingness to investigate and address unlawful use of their networks for gambling transactions.⁴ We should capitalize on this willingness to shut down illegal offshore gaming operations.

¹ *Sizing the Illegal and Unregulated Gaming Markets in the United States*, Am. Gaming Ass'n (Nov. 2022), <https://perma.cc/FPA8-7ADB>.

² Press Release, U.S. Dep't of Just., Federal Courts Order Seizure of 150 Website Domains Involved in Selling Counterfeit Goods as Part of DOJ, ICE HSI and FBI Cyber Monday Crackdown (Nov. 28, 2011), <https://perma.cc/UR9S-Z2YR>.

³ Press Release, U.S. Secret Service, Justice Department Seizes Four Web Domains Used to Create Over 40,000 Spoofed Websites and Store the Personal Information of More Than a Million Victims (Apr. 4, 2018), <https://perma.cc/NCD8-5B8N>.

⁴ *Mastercard and Visa Pledge Vigilance Following Gambling Investigation*, PYMNTS (Mar. 10, 2025), <https://perma.cc/AS3X-ATJH>.

Request for Cooperation

We strongly encourage USDOJ to prioritize enforcement against illegal offshore gaming operations. In its FY24 appropriations directive, Congress emphasized the importance of this issue.⁵ Under your leadership, we urge the USDOJ to coordinate with our offices to:

- Pursue injunctive relief and website seizures under federal law;
- Seize assets and domain names of illegal offshore gaming operators; and
- Coordinate with financial institutions to block unlawful transactions and dismantle the financial infrastructure supporting these enterprises.

We stand ready to collaborate with the USDOJ to protect our residents and uphold the laws of our country and of our States.

Sincerely,



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Nebraska Attorney General



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Andrea Joy Campbell
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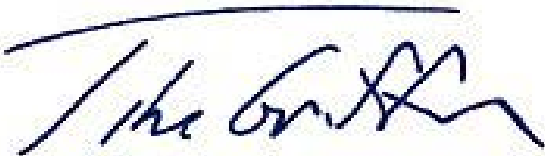
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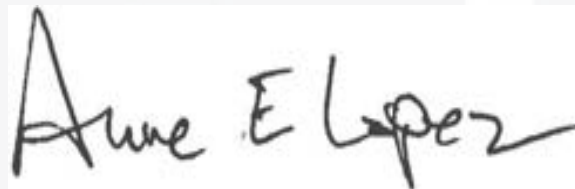
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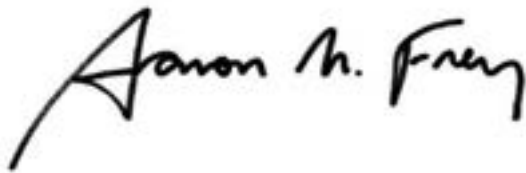
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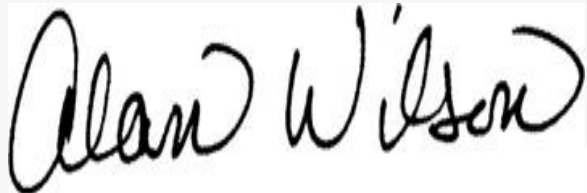
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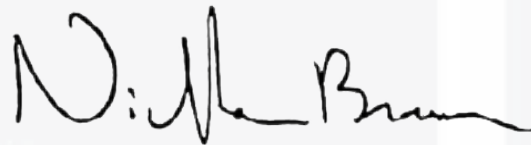
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