Federal & Indian Gaming Law		
Internet Part 2		

Circuit Switched Networking

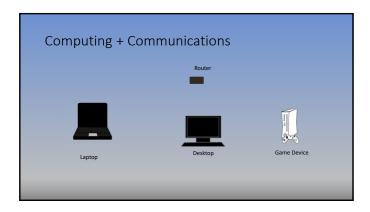
- A continuous dedicated circuit is created between transmitter and receiver
- Circuits can be made by connecting lines through switches
- \bullet All communications are direct point-to-point communications

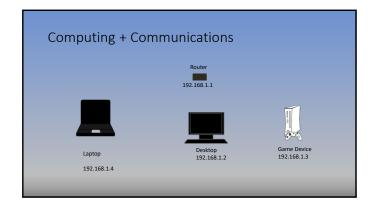
RECAP Holiday Sun

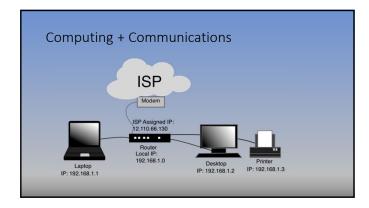
TCP/IP Communications	
Information of all kinds is broken into packets	
 Packets follow a uniform set of international standards Packets flow from origination to destination through a series of 	
routers	
 Routers look for the least congested way to send a packet toward the destination 	
Each packet can take its own route to the destination	
TCP/IP Communications	
TCF/IF COMMINICATIONS	
Once at the destination, the packets are unpacked and the information is reassembled	
The information can then be used by the recipient at the destination	
TCP/IP Communications	-
Because packets travel from origin to destination using opportunistic	
routing, the overall network is deemed to be "self healing" • This means that if a route is lost or inoperative, the packet will be rerouted to	
reach its destination The route is independent of geography	

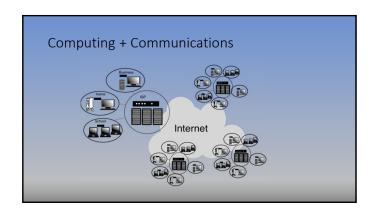
Communications
With wide area packet switching, an interconnection of networks was possible
This clip is for non-commercial use only • https://youtu.be/7NpczzIsnLU

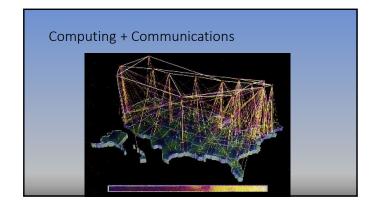
Computing + Communications On a packet switched network, every device has an IP address MAC Terminal ipconfig getifaddr en1 Win CMD ipconfig

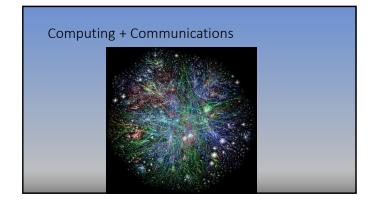














Online Gaming in the U.S. In 1994, Antigua and Barbuda enacted the Free Trade & Processing Act This permitted online casino operations from their jurisdiction Under the laws of Antigua and Barbuda, bets are deemed to be placed solely where they are recorded in Antigua and Barbuda Barbuda Online Gaming in the U.S.

Online Gaming in the U.S. The evolution of technology adoption and unage 1996-2000s, "Off Shore" wagering soars: 8 Better pricing (no regulatory overhead) 2 Easy Credit 2 Anonymous computer access 4 Systems are developed in Costa Rica & the U.S. 2 Often based on horse racing totalizer systems 7 No MIAMAGE COSTS Coincides with a personal tech revolution



	DE DAZY POCOFER OUT - TOUROUSE OUT - TOUROUSE
	The only way to clear the internet tube from poker chips is to blief a round lettery buils through it.
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LAW and Technology

- Technology is moving at a rapid pace often without regard for the impact of the technology on existing laws and regulations
- Internet technologies are inherently not contained by geography
- \bullet Government jurisdiction and laws are inherently limited by geography
- \bullet Containing internet traffic by government order is difficult



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- The Jay Cohen Opinion The basic facts:
 - Jay Cohen works for Group One in San Francisco developing a derivative trading software system.
 - They realize derivatives and sports wagers were not that different to a computer.
 - In 1996 he starts an online and telephone account wagering business, World Sports Exchange, with two other friends.

The Internet

- The Jay Cohen Opinion The basic facts:
 - $\bullet\,$ FBI Agent places wagers with WSE by telephone and through the Internet site.
 - Cohen and others indicted.
 - Cohen returns to the U.S. for a wedding then turns himself in to fight the charges.

The Internet

- The Jay Cohen Opinion Cohen's Arguments:
 - He cannot be convicted on conspiracy charges without a corrupt motive.
 - That the wagers were placed in Antigua were subject to the safe harbor provision of Section 1084(b).
 - He lacked the knowledge requirement of 1084(a).
 - The rule of lenity should apply because the statute is ambiguous as applied.
 - The court amended the indictment
 - The court failed to permit a delay to take the deposition of a foreign witness

The Internet	
• The Jay Cohen Opinion – The Court's Opinion:	
He cannot be convicted on conspiracy charges without a corrupt motive. The Powel doctrine (that an act that was innocent itself required evidence of a corrupt or	
evil purpose) does not apply to 1084.	
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T	
The Internet	
The Jay Cohen Opinion – The Court's Opinion: That the wagers were placed in Antigua were subject to the safe harbor	
 Inact the wagers were placed in Antigua were subject to the sale narbor provision of Section 1084(b). There are 2 requirements for the safe harbor: 	
 The activity has to be legal at both ends of the transmission. The transmission is limited to mere information assisting in the placement of the bet or 	
wager.	
	1
The Internet	
The Jay Cohen Opinion – The Court's Opinion: That the wagers were placed in Antigua were subject to the safe harbor	
provision of Section 1084(b). • Is the activity legal at both ends of the transmission?	
 There can be no dispute that betting is illegal in New York By its plain terms, the safe-harbor provision requires that betting be "legal," i.e., permitted by law, in both jurisdictions. 	

	•
The Internet	
The Jay Cohen Opinion – The Court's Opinion:	
That the wagers were placed in Antigua were subject to the safe harbor	
 provision of Section 1084(b). Is the activity merely the transmission of information assisting in the placing of a wager? 	-
 It was the Government's burden in this case to prove that someone in New York signaled an offer to place a particular bet and that someone at WSE signaled an acceptance of that offer. 	
 WSE could only book the bets that its customers requested and authorized it to book. By making those requests and having them accepted, WSE's customers were placing bets. So long as the customers' accounts were in good standing, WSE accepted those bets as a matter 	
of course	-
The Internet	
 The Jay Cohen Opinion – The Court's Opinion: He lacked the knowledge requirement of 1084(a). 	
Section 1084 prohibits the "knowing" transmission of bets or information assisting in the placing of bets.	
it mattered only that Cohen knowingly committed the deeds forbidden by § 1084, not that he intended to violate the statute.	
	1
The Internet	
THE IIILETHEL	
• The Jay Cohen Opinion – Cohen's Arguments:	
 The rule of lenity should apply because the statute is ambiguous as applied. The rule of lenity applies where there exists a "grievous ambiguity" in a statute. 	
 The rule exists to prevent courts from "applying a novel construction of a criminal statute to conduct that neither the statute nor any prior judicial decision has fairly disclosed to be 	
within its scope."	

The Internet	
The Jay Cohen Opinion – Cohen's Arguments:	
The rule of lenity should apply because the statute is ambiguous as applied. First, account-wagering is wagering nonetheless; a customer requests a particular bet	
 First, account-wagering is wagering nonetneess; a customer request a particular bet with WSE by telephone or internet and WSE accepts that bet. WSE's requirement that its customers maintain fully-funded accounts does not obscure that fact. 	
 Second, Cohen established two forms of wire facilities, Internet and telephone, which he marketed to the public for the express purpose of transmitting bets and betting 	
information. Cohen subsequently received such transmissions from customers, and, in turn, sent such transmissions back to those customers in various forms, including in the form of acceptances and confirmations. No matter what spin he puts on "transmission,"	
his conduct violated the statute. Third, it is clear to lawyer and layman alike that an act must be permitted by law in	
order for it to be legal.	
	<u> </u>
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The Internet	
The Jay Cohen Opinion – Cohen's Arguments:	
The court failed to permit a delay to take the deposition of a foreign witness Cohen states that the witness' testimony was material to two issues at his trial: (1)	
whether Cohen had a corrupt motive; and (2) whether Cohen believed that he was transmitting mere information assisting in the placing of bets rather than any bets	
themselves. • As this Court has already discussed, neither of these two issues was relevant to the	
question of Cohen's guilt under § 1084.	
	•
The data was t	
The Internet	
• The Jay Cohen Opinion – Comments	
	l ————

- In 2001, AB466 was enacted by the Nevada legislature
 - Remote wagering on subjects other than race and sports was becoming popular world wide
 - In Europe, satellite TV operators offered bingo games, cable TV operators offered keno, and cell phone operators had a pay-to-play and win black-jack game
 - World-wide online gaming was growing fast

sibly Bill No. 466-Assemblymen Leslie, Parks, Parnell, Gibbons, Anderson, Brower, Chowning, Freeman, Gianchigliani, Hurnke, Smith and Tiffany

Online Gaming in the U.S.

- In 2001, AB466 was enacted by the Nevada legislature
 - To capture all forms of remote wagering (other than race and sports) the Nevada legislature coined the term "Interactive Gaming"
 - While the term was novel in 2001, it has come to have a different meaning outside of Nevada's regulatory system

bby Bill No. 466-Assemblymen Leslie, Parks, Parnell, Gibbons, Anderson, Brower, Chowning, Freeman, Gianchigliani, Hurnke, Smith and Tiffany

Online Gaming in the U.S.

AB466 - 2001

- AB406 2001

 "Interactive gaming" means the conduct of gambling games through the use of communications technology that allows a person, utilizing money, checks, electronic checks, electronic transfers of money, credit cards, debit cards or any other instrumentality, to transmit to a computer information to assist in the placing of a bet or wager and corresponding information related to the display of the game, game outcomes or other similar information. The term does not include the operation of a race book or sports pool that uses communications technology approved by the board pursuant to regulations adopted by the commission to accept wagers originating within this state for races or sporting events.

 As used in this section, "communications technology" means any method used.
- 2. As used in this section, "communications technology" means any method used and the components employed by an establishment to facilitate the transmission of information, including, without limitation, transmission and reception by systems based on wire, cable, radio, microwave, light, optics or computer data networks, including, without limitation, the Internet and intranets.

AB466 - 2001 - Sec 3.

- 1. Except as otherwise provided in subsections 2 and 3, the commission may, with the advice and assistance of the board, adopt regulations governing the licensing and operation of interactive gaming.
- 2. The commission may not adopt regulations governing the licensing and operation of interactive gaming until the commission first determines that: $\frac{1}{2} \int_{-\infty}^{\infty} \frac{1}{2} \left(\frac{1}{2} \int_{-\infty}^{\infty} \frac{1}{2} \left(\frac{1}{2$
- (a) Interactive gaming can be operated in compliance with all applicable laws;
- (b) Interactive gaming systems are secure and reliable, and provide reasonable assurance that players will be of lawful age and communicating only from jurisdictions where it is lawful to make such communications; and
- (c) Such regulations are consistent with the public policy of the state to foster the stability and success of gaming.

Online Gaming in the U.S.

AB466 - 2001 - Sec 3.

- 3. The regulations adopted by the commission pursuant to this section must:
- (a) Establish the investigation fees for:
- (1) A license to operate interactive gaming;
- (2) A license for a manufacturer of interactive gaming systems; and
- (3) A license for a manufacturer of equipment associated with interactive gaming.

Online Gaming in the U.S.

AB466 – 2001 – Sec 3. (b) Restricts operators licenses to the following

A resort hatel that holds a monrestricted gaming licese. A resort hatel that holds a monrestricted gaming licese. A resort hatel is any building or group of buildings that is maintained as and hold out to the steeping accommodations are furnished to the transient public and that has 1. More than 200 rooms available for sleeping capacity for more than 30 patrons that servers alcoholic beverages sold by the drink for J. At least on restruarnat with permanent seating capacity for more than 40 patrons that is open to the public 24 hours each of the processing of the processing the permanent seating capacity for more than 60 patrons that is open to the public 24 hours each 4, 4 gaming area within the

Online Gaming in the U.S.	
AB466 – 2001 – In sum:	
Permits the Nevada Gaming Commission to issue regulations and license for licensing interactive gaming operations to casino	
operators of sufficient size, and to issue licenses for the manufacture and distribution of interactive gaming systems, if the	
Commission determines the activity can be conducted in	
compliance with all applicable laws.	
	<u> </u>
Online Gaming in the U.S.	
AB466 – 2001 – In sum:	
 The 2001 Act, envisioned an online gaming market similar to the casino market with two basic areas of licensing: 	
Operators Manufacturers & Distributors	
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Online Gaming in the U.S.	
AB466 – 2001 – In sum:	
The Commission begins hearings and learning about technologies	
for geofencing, age verification, fraud prevention, accounting, player protections, problem gambling	

Online Gaming in the	U.S.	
Can you guess the outcome?		
C.S. Department of Justice 1 Spring S	equivalence, destine of service or pain of sight features, and if I become first features from the service of restaults in an advantage of the service of th	
August 27, 2002 Exhibit 2 Mr. Denni K. Nollander, Chairman Norwak Gaming Control Based P. O. Ber 2000 Control (Sp. Norbid 2070)	or foreign country where the genebility business is located. I treat that this is responsive to your implicy. Please do not besiste to contact us if we can be of any further univisions in this or any other matter. Smotney,	
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Online Gaming in the	U.S.	
Nevada's initial efforts to draft r	egulations and issue licenses for	
interactive gaming end with the	receipt of the DOJ letter.	

UIGEA	
The background	
• The timing	
• The bill	-
	-
	1
LUCEA	
UIGEA	
What is the rule of construction? A 21 U.S.C. 5251(b) Bulg of construction. No provision of this subchapter shall	-
 31 U.S.C. 5361(b) Rule of constructionNo provision of this subchapter shall be construed as altering, limiting, or extending any Federal or State law or Tribal-State compact prohibiting, permitting, or regulating gambling within 	
UIGEA	
What is the rule of construction?	
• 31 LLS C 5361(b) Rule of construction No provision of this subchapter shall	
be construed as altering, imiting, or extending any Federal or State law or Tribal-State compact prohibiting, permitting, or regulating gambling within the United States.	
	-

UIGEA	
Based on the rule of construction, does the UEIGA make online poker illegal?	
	-
UIGEA	
Exceptions to the definition of Bet or Wager Securities trading	-
UIGEA	
 Business of Betting or Wagering The term "business of betting or wagering" does not include the activities of a 	
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Unlawful Internet Gambling The term "unlawful Internet gambling" means to place, receive, or otherwise knowingly transmit a bet or wager by any means which involves the use, at least in part, of the Internet where the receiver or wager is untached under any applicable federal or state that in the little in which his better wager is intifered, research, or otherwise made.	
Ullawful Internet Gambling - Exceptions Intrastate wagers where such wagering is legal, provided there is appropriate data security and age verification Intra-tribal transactions Interstate horseracing in compliance with the IHRA	
The operative language (31 USC 5363) No person engaged in the business of betting or wagering may knowingly accept, in connection with the participation of another person in unlawful Internet gambling— anything of common value	

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UIGEA	
• Regs	
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UIGEA	
 Regulatory Definition of Bet or Wager (c) Bet or wager. (1) Means the staking or risking by any person of something of value 	
upon the outcome of a contest of others, a sporting event, or a game subject to chance, upon an agreement or understanding that the person or another person will	
receive something of value in the event of a certain outcome; • (2) Includes the purchase of a chance or opportunity to win a lottery or other prize	
(which opportunity to win is predominantly subject to chance);(3) Includes any scheme of a type described in 28 U.S.C. 3702;	
 (4) Includes any instructions or information pertaining to the establishment or movement of funds by the bettor or customer in, to, or from an account with the 	
business of betting or wagering (which does not include the activities of a financial transaction provider, or any interactive computer service or telecommunications service); and	
Service), and	
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UIGEA	
Regulatory Definition of Unlawful Internet Gambling	
Unlawful Internet gambling means to place, receive, or otherwise knowingly	
transmit a bet or wager by any means which involves the use, at least in part, of the Internet where such bet or wager is unlawful under any applicable	
Federal or State law in the State or Tribal lands in which the bet or wager is initiated, received, or otherwise made. The term does not include placing,	
receiving, or otherwise transmitting a bet or wager that is excluded from the definition of this term by the Act as an intrastate transaction or an intra-tribal	
transaction, and does not include any activity that is allowed under the Interstate Horseracing Act of 1978 (15 U.S.C. 3001 et seq.; see §132.1(a)). The	
intermediate routing of electronic data shall not determine the location or locations in which a bet or wager is initiated, received, or otherwise made.	

UIGEA	
Other provisions Regulations to make financial organizations the enforcers of the statute	
LUCEA	
UIGEA	
Discussion	
What does the UIGEA prohibit?	
Does the UIGEA make online casino wagering illegal?	
Does the UIGEA make funding skill gaming illegal?	
 What are the parameters for acceptable online fantasy sports exempted from the Act? 	
•	
UIGEA	
010271	
Discussion http://www.informationweek.com/news/showArticle.ihtml?articleID=215801	
153	

- Time marches on... 2006 UIGEA is enacted
 - $\bullet\,$ 2007 Publicly traded companies in the U.K. abandon the U.S. online poker market
 - 2008 While the major providers of online poker exited the market, demand was strong and it was filled by three major private companies Poker Stars, Full Tilt, and Absolute Poker with several other smaller
 - 2009 NY and IL begin online lottery subscriptions
 - 2011 Senator's Reid and Kyl reach a preliminary agreement on a federal online poker bill

Online Gaming in the U.S.

- ABA258 Atmosphere
 - Gaming in NV is financial on the ropes from the financial crisis
 - \bullet PokerStars, Full Tilt and Absolute Poker are lobbying openly in Congress
 - A federal online poker bill was likely to be imminent
 - Off-shore operators like PokerStars, Full Tilt and Absolute Poker were looking to do a deal with Nevada operators paying a premium to Nevada operators to partner up.
 - AB258, largely sponsored by off-shore poker operators sought to require Nevada to license online poker and issue licenses to such poker operators and turn Nevada gaming regulation upside-down for poker.

Online Gaming in the U.S.

ABA258 – 2011 Session

Exacts provisions governing the licensing and operation of Internet poker. (BDR 41-657) DSCAL NOTE: Effect on Local Government: No. Effect on the State: You. AN ACT relating to gaming; requiring the Nevada Gaming Commission to adopt regulations relating to the licensing and operation of Internset polar; and providing other matters properly relating therets. egislative Casmel's Dignet:
Existing law authorise certain gazzing orthibideness to obtain a license to provine interactive gazzing, CMS 403,791 This bill superess the Nevada Gazzing certaining to extablish by supplicate certain provisions refluctiving the licensing of assention of Bernste notice space certain provisions. THE PEOPLE OF THE STATE OF NEVADA, REPRESENTED IN SENATE AND ASSEMBLY, DO ENACT AS FOLLOWS:

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** Sec. 6. ** Tatorner paler" means any of the cord games a community referred to an paler which is played by two or more adoptively referred to an paler which is played by two or more adoptively referred by game and is which survives over the land, which illustration, part of the community of	
Assembly Bill No. 256 -Committee on Judiciary CHAPTE	
No. 12. NSS 48.750 h hereby annotated to read a follows: 48.170 1. Recognition and enhancemental and annotations and extractive partial and annotations and extractive partial and annotation and experience of interestive garming. An operation of interestive garming until the community of the extraction of interestive garming and the community of the extraction of interestive garming and the community of the extraction of interestive garming of the extraction of interestive garming of the extraction of interestive garming for the extraction garming the interesting garming for the extraction garming garming for the garming	

• ABA258 – Key Provisions

- The Board would be compelled to draft and the Commission compelled to adopt online poker regulations
 The Commission would be compelled to issue online poker licenses
- The Board cannot recommend denial of an online poker license due to illegal activities of off-shore poker operators
- The Commission cannot deny an online poker license to an applicant due to illegal activities of off-shore poker operators
- Online poker licenses would not require a brick-and-mortar gaming license
- Any denied applicants for an online poker license would have the right to appeal to the courts





United States Attorney Southern District of New York

FOR IMMEDIATE RELEASE APRIL 15, 2011 CONTACT:

U.S. ATTORNEY'S OFFICE ELLEN DAVIS, CARLY SULLIVAN, JERIKA RICHARDSON, EDELI RIVERA PUBLIC INFORMATION OFFICE (212) 637-2600

FBI TIM FLANNELLY, JIM MARGOLIN PUBLIC INFORMATION OFFICE (212) 384-2100

MANHATTAN U.S. ATTORNEY CHARGES PRINCIPALS
OF THREE LARGEST INTERNET POKER COMPANIES WITH BANK
FRAUD, ILLECAL GAMBLING OFFENSES AND LAUNDERING
BILLIONS IN ILLEGAL GAMBLING PROCEEDS

Multi-Billion Dollar Civil Money Laundering And Forfeiture Action Also Filed



[b] 4. The Commission may.
(a) State a license to operate interactive gaming to an affiliate of
(b) The establishment satisfies the applicable requirements
of forth in subsection [44-msl]. 27.
(b) The affiliation is located in the same county as the
(c) The affiliation is located in the same county as the
(d) The citablishment has held a moneratrical license for
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establishmen by Journal unw regulating the incensure of universities.

A. It is unlawful for any person, either as owner, lessue or employee, whether for hire or not, either solely or in conjunction with others, to openate interactive gaming:

(a) Until the Commission adopts regulations pursuant to this section; and



- ABA258 2011 Session Major Changes after April
 - The bill recognized that efforts were underway in Washington D.C. to provide a federal regulatory framework for online poker
 - The bill removed all requirements imposed on regulators from the original bill text other than the creation and adoption of regulations, thus preserving the discretionary powers of Nevada's gaming regulators
 - AB258 is enrolled and enacted in May 2011

Online Gaming in the U.S.

- ABA258 Final Key Provisions
 The Board would be compelled to draft and the Commission compelled to adopt online poker regulations
 The Commission would be compelled to issue online poker licenses

- December 23, 2011

 - The DOJ issues its Federal Wire Act Opinion

 A memorandum is issued that that DOJ Opinion is sufficient notice from the Federal Government that Interactive Gaming can be regulated and operated within Nevada

Online Gaming in the U.S.

• AB114 - 2013 Session -

sbly Bill No. 114-Assemblymen Horne, Kirkpatrick, Frierson, Healey, Bobzien; Paul Anderson, Eisen, Ellison, Flores, Hardy, Hickey and Kirner

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Johnt Spource, Seather Addisson, Khoen, Denis, Smith,
Manesch, Feed, Hammood and Settleneyer
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interactive gaming, requering the Novada Goming
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related to interactive gaming; and providing other matters
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Online Gaming in the U.S.	Assembly Bill No. 114-Assemblyums Horne, Kirkpatrick, Frienson, Healey, Borbeire, Bull Ardenon, Einen, Ellison, Flores, Handy, Hickey and Kirner Joint Sponsoes: Senators Atkinson, Kihuen, Denis, Smith, Mancado, Ford, Harmmond and Settlebuyer		
• AB114 – 2013 Session –	CHAPTER. AN ACT relating to graning, defining certain terms related to instructive garmage, respiring the Nevada Garning Commission boad per regulation sustaining the Governor to enter into agreements with other taken to conduct instructive garments in the conductive constructive garment of the conductive garment of the conductive garment of the conductive garment to certain person, revising provisions related to interactive garming, and providing other markers propoly relating thorton.		
	medicative gaining of certain perhasis, revising provisions medicative gaining decisions, and provising other matters perposely vectoring thereine. Legislative Custant's Digonic contractive gaining contracting gaining caldiditations to obtain a Scores to operate minimizing gaining (NSS 60.750) Sections 2.64 of the little delice certain times for the propose of determining shorter a person to be found unable for a contractive gaining of the person of the contractive gaining and Gaining Commission to adopt regulations authorizing the General to sincer into gargeneously with other times a side person of flow states to protegate in the contractive gaining of the contractive gaining and gaining commission to adopt regulations authorizing the General to sincer the state of the state in allow genom of flow states to protegate in the contractive gaining and the person of the state protective with other states in allow genom of flow states to protegate in the contractive gaining and the person of the state protective with other times and protective states of the person of the state person of the state of the person of the state person of the state of the person of the state person of the state of the person of the state person of the state person of the state of the person of the state person of t		
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approved by both chambers and signed i	y the dovernor.		
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Online Gaming in the U.S. — Nevada Today NRS 463.016425 "Interactive gaming" defined. 1. "Interactive gaming" means the conduct of gambling games through the use of communications technology that allows a person, utilizing money, check, electronic checks, electronic transfer of money credit cards, debt cards or any other person, utilizing money, check, electronic checks, electronic transfer of money credit cards, debt cards or any other person, and the communication of the communication of the cards or any other related to the display of the game, game outcomes or other similar information. The terms of the communication cards are considered in the communication of the communication to accept vages or originating within this state for race, or sporting events or other similar within this state for race, or sporting events or other similar within this state for race, or sporting events or other similar within this state for race, or sporting events or other similar within this state for race, or sporting events or other similar within this state for race, or sporting events or other similar within this state for race, or sporting events or other similar within this state for race, or sporting events or other similar within this state for race, or sporting events or other similar within this state for race, or sporting events or other similar within this state for race, or sporting events or other similar within this state for race, or sporting events or other similar within this state for race, or sporting events or other similar within this state for race, or sporting events or acceptance of the state of the state

Conline Gaming in the U.S. INTENCINE CARDO 1. The first of forests and the same in game agreement of the forest in the first of forests and the same in game agreement of the first of the first of forests and the same in game agreement of the first of the first of forests and the same in game agreement of the first of forests of f

Online (Gaming in the U.S.	
NRS 463.750 Li	icense required for person to operate interactive gaming or to manufacture interactive gaming systems; registration required to act as service provider; Commission: regulations: conditions: limitations; penalty.	
1. The Commission	on shall, with the advice and assistance of the Board, adopt regulations governing:	
(a) The licensing a	and operation of interactive gaming; and n of service providers to perform any action described in paragraph (b) of subsection 6 of NRS 463.677.	
2. The regulation	a adopted by the Commission purposet to this section must:	
(1) A license to	sventgation fees for:	
(2) A license f	for a manufacturer of interactive naming systems:	
(3) A license f	for an interactive gaming service provider to perform the actions described in paragraph (a) of subsection 6 of NRS 463.677; and on as a service provider to perform the actions described in paragraph (b) of subsection 6 of NRS 463.677.	
(b) Provide that:		
(1) A person of proprietary software	must hold a license for a manufacturer of interactive gaming systems to supply or provide any interactive gaming system, including, without limitation, any piece or hardware.	
(2) À person n (3) A person n (c) Except as other	must hold a license for an interactive gaming service provider to perform the actions described in paragraph (a) of subsection 6 of NRS 463.677; and must be registered as a service provider to perform the actions described in paragraph (b) of subsection 6 of NRS 463.677. while provided in subsections 0 to 10; inclusive, see frost standards for the sustability of a servine to be.	
(2) Licensed	as a manufacturer of interactive gaming systems; as an interactive gaming service provider as described in paragraph (a) of subsection 6 of NRS 463.677 that are as stringent as the standards for a nonrestricted	
license; or	as a service provider as described in paragraph (b) of subsection 6 of NRS 463.677 that are as stringent as the standards for a nonrestricted license.	
(d) Set forth provis	sions solversing:	
(1) The initial	fee for a license for an interactive gaming service provider as described in paragraph (a) of subsection 6 of NRS 463.677. [fee for registration as a service provider as described in paragraph (b) of subsection 6 of NRS 463.677.	
(3) The fee fo	by the renewal of such a license for such an interactive gaming service provider or registration as a service provider, as applicable, and any renewal requirements	
for such a license or re	gistration, as applicable. con of the license fee said by a serson licensed to operate interactive naming, surrount to subsection 1 of NRS 463,770, for which an interactive naming service	
provider may be liable	to the person licensed to operate interactive gaming.	
(e) Provide that gro	ous revenue received by an establishment from the operation of interactive gaming is subject to the same license fee provisions of NRS 462.370 as the games and establishment, unless federal law otherwise provides for a similar fee or tax.	
(f) Set forth standa	ates for the location and security of the computer system and for approval of hardware and software used in connection with interactive gaming, tive gaming system, "manufacturer of interactive gaming systems," "operate interactive gaming" and "proprietary hardware and software" as the terms are used	
 Except as other 	rwise provided in subsections 4 and 5, the Commission shall not approve a license for an establishment to operate interactive gaming unless:	
(a) In a county who (b) In a county who or the establishment:	one population is 760,000 or more, the establishment is a resort hotel that holds a nonrestricted license to operate games and gaming devices. one population is 45,000 or more but less than 700,000, the establishment is a resort hotel that holds a nonrestricted license to operate games and gaming devices	

Online Gaming in the U.S. NS. 40.76. Initial literar for for anaesters rever at fac. Interpret of gaming ryons. Interpret of gaming ryons.

	REGULATION SA OPERATION OF INTERACTIVE GAMING	"Picker" means the traditional game of poker, and any derivative of the game of poker as approved by the Chair and published on the Board's vestosite, wherein two or more stigen; play against each other and wayer on the value of the hands. For purpose of intercolver games, poker is not all sharking pane.
SA 010 Scope. SA 020 Defection		point of reception through communications technologies as defined by NRS 463.016425(2). (Adopted: 12/11; Amended: 4/16; 5/17.)
SA,030 Ucense S SA,040 Initial and	Ingelrad, Applications.	5A 030 License Required; Applications. 1. A person may act as an operator of interactive parson priv if that person holds a license specifically
SA.050 Investigat SA.050 Interactive		permitting the person to act as an operator of interactive garring.
SA.000 Detection	ordinals for Operators of Interactive Gaming and Prevention of Criminal Activities.	Applications for an operator of interactive garning license shall be made, processed, and determined in the same manner as applications for nonrestricted garning licenses, using such forms as the
SA 100 House Ru SA 110 Registrati		Chair may require or approve. (Adopted: 1211.)
SA.120 Interactive SA.125 Reserve F		5A 040 Initial and Renewal License Fees. Refers the Commission issues an initial iconse or renews
SA 130 Self-Exito SA 135 Compone SA 140 Accepton SA 145 Progressi	ation. Co of Wingers.	a license for an operator of interactive gaming the operator of interactive gaming shall pay the license fees established pursuant to NRS 463.765.
SA.190 Informatio SA.195 Advertision		(Adopted: 12/11.)
		SA 050 Investigative Fees. Applications for an operator of interactive gaming license shall be subject
	netus License Fees, Attribution, Liability and Computations for interactive Gaming. n of Disputes.	to the application and investigative fees established pursuant to Regulation 4.070. (Adopted: 12/11.)
SA 190 Records SA 290 Grounds	for Disciplinary Action.	
	Commission and Board. Gaming Service Providers.	5A.060 Interactive Garring Systems.
SAZE Water of	Regulating services From London. Regulation.	An operator shall not operate a new interactive gaming system in this state unless the interactive gaming system has been approved by the Commission. Operators shall provide the Bloard, prior to commencing operations of their interactive gaming.
5A.010 Sco	ge. Regulation 5A shall govern the operation of interactive gaming. The provisions of the	system, with a list of all persons who may access the main computer or data communications components of their interactive gaming system and any changes to that list shall be provided to the Board within ten (10)
Gaming Control of conflict with Regul (Adopted: 12)	Act and all regulations promulgated thereunder shall still otherwise apply when not in lation SA.	days. (Adopted: 12/11.)
		6A.070 Internal Controls for Operators of Interactive Gaming. Each operator shall establish,
	nitions. As used in this regulation: ad player" means a person who has registered with the operator of interactive gaming to	maintain, implement and comptly with standards that the Chair shall adopt and publish pursuant to the provisions of Regulation 0.000. Such minimum standards shall include letternal controls for: 1. As secretized under Regulation 6.000011, administrative, accounting and lastif procedures for the
2. 'Chair' m 3. 'Interaction	eans the Chair of the Nevada Gaming Control Board or the Chair's designee. regaming account" means a wagering account as that term is defined in Regulation 5.225.	purpose of determining the licensee's liability for taxes and fees under the Gaming Control Act and for the purpose of exercising effective control over the licensee's internal affairs;
Interactive carning	ve gaming service provider" means a person who acts on behalf of an operator of	Maintenance of all aspects of security of the interactive gaming system; Registering authorized players to engage in interactive gaming:
(a) Manages	g and: , administers or controls wagers that are initiated, received or made on an interactive	 Identification and verification of authorized players to prevent those who are not authorized players
	, administers or controls the games with which wagers that are initiated, received or made	from engaging in interactive gaming. The procedures and controls must incorporate robust and redundant identification methods and measures in order to manage and mitigate the risks of non face-to-face
(c) Maintains	gaming system are associated; or operates the software or hardware of an interactive gaming system; or products, services, information or assets to an operator of interactive gaming and receives	transactions inherent in interactive garning: 5. Protecting and ensuring confidentiality of authorized players' interactive garning accounts;
therefor a percent	products, services, information or assets to an operator of interactive gaming and receives tage of gaming revenue from the establishment's interactive gaming system, se gaming system, shall have the same meaning as provided in Resulation 14.010.	 Reasonably ensuring that interactive gaming is engaged in between human individuals only. Reasonably ensuring that interactive gaming is conducted fairly and honestly, including the
	re garming system" shall have the same meaning as provided in Regulation 14.010. Inator poker network" means a pool of authorized players from two or more operators	prevention of collusion between authorized players. 8. Testing the integrity of the interactive gamine system on an oncoine basis:
collected together	to play the game of poker on one interactive gaming system.	Promoting responsible interactive gaming and preventing individuals who have self-excluded from
or from the State	interactive gaming" means to operate, carry on, conduct, maintain or expose for play in of Nevada interactive gaming on an interactive gaming system.	engaging in interactive gaming. Such internal controls shall include provisions for substantial compliance with Requision 5.170; and
	of interactive gaming or "operator" means a person who operates interactive gaming, eractive gaming who is granted a license by the Commission is a licensee.	Potesting an authorized player's personally identifiable information, including, but not limited to: (a) The designation and identification of one or more senior company officials having primary

(ii) The procedure is the unit of incomers the claims of incomer in procedure in the claim of incomers in the claim of in	D) The deductal date of their this covering that the celled set is 2 years of ages or other. (1) The large but does when the not found sensity, wanter for the reductal of a blood (before the cells of the cells o			
(6) Natification to submitted player of privacy policies; (a) Procedures to be used in the event the operator determines that a breach of data security has occurred, including required notification to the Board's enforcement division, and (f) Provision for compliance with all local, date and federal laws concerning privacy and security of personally standardate information.	(f) That the individual is not on the list of excluded persons established pursuant to NRS 453.151 and Regulation 28. 3. Buffer regulating an individual as an authorized player, the operator must have the individual affirm the following: (a) This the information provided to the operator by the individual to regulate is accurate.			
Therannily identificate information' means any information about an individual maintained by an operator including (1) any information that can be used to distinguish or this can information stretch, such as name, social security number, date and place of birth, mothers maiden name, or biometric records; and (2) any other information that is friend or linkable to an individual, such as medical, educational, financial, and englisyment information.	(b) That the individual has reviewed and acknowledged access to the floure rules for interactive general. That the individual has been referred and has acknowledged that, as an authorition algays, the individual is prohibited from allowing any other person access to or use of his or her interactive gaming account;			
The Chair may common approximate pay the pay of the Chair may common subsequent. For Chair shall exploy and publish any such additional internal controls and their minimum standards pursuant to the previsions of Regulation 6.000. [Additional Chair State C	(b) The first model and accordance and activationing of consists to the basis are for contracted. (c) The first model accordance to the contract and accordance accordance accordance against the contract accordance accorda			
procedures that are designed to defect and prevent transactions that may be associated with money sandering, fluxed and other criminal activities and to ensure compliance with all federal laws related to money (sundaring, [Alospeet 1211.5.]	(g) Consents to the jurisdiction of the State of Nevada to resolve disputes arising out of interactive.			
As 80. As a series in Promise and Production of Essentin Resolving Investigation Field. 1. Operation Found, is latered insently for Commission are shall not be promised in NGI 43.15.15. In shall be an oranization entered of operation for on provider histing a latered insently for the control of the second of the control of the contr	gaining. 4. An operator may allow an includual to register as an authorized player either remotely or in person. 5. Within 30 days of the registration of the authorized player, the operator shall verify the information provided by the includual pursuant to subsection 2, rules such verification has construct (a). The authorized player may not deposit more than \$5,000 in his or her interactive gaining account, and			
 Upon being granted a loanse by the Connection, operatins shall depost with the Board and thereafter martian a revolving fund in an emount of \$20,000, unless a lover amount is approved by the Chies, with health be used to pay the expenses of agents of the Board and Commission to investigate complance with this regulation. Montered 12115. 	(b) The authorized player may not withdraw any funds from his or her interactive gaming account.			
A-100 Repair Rules. Each species while about any other to written, comprehensive bose halos controlled to the second of the seco	6. If well-colors of the information provided primared to subsection 2 has not occurred within 3.0 days, color to the colors of the colors			
Clear and consiste explanation of all fees; The name of play of a genter; Any monetary wagering limbs; and Any time limbs; portaining to the play of a game. Price to adopting or amending such house rules, an operator shall submit such rules to the Chair for the	6.A.128 Interactive Gamming Accounts. In addition to the recyclements established pursuant to this publisher 5.2% an operator shall comply with the liberary for releasely searing accounts, and an additional pursuant to the search of the control of the additional purpose of the anti-ordinary purpose of			
	2. An operator shall ensure the bibliowing. (a) The lan individual registered as an authorized player balds only one efferactive gaming account with the operator, and (b) The operator and (c) The operator of the operator operator of the operator opera			
8.119 Beginntion of Authorized Player. 8.119 Beginntion of Authorized Player. 1. Authorized Player of Authorized Player. 1. Authorized player of Control of Authorized Player of Control of State Office of Control o	(a) That is relocated imprised as an advicated play holds only one intending garing source. (b) That is relocated player about page your test have inpositive a gainer along prints them. 3. The interdiscreting indentities if a fillinguistics. 125 this operator and resches credit credit to less it. 3. The interdiscreting indentities is a fillinguistics. 125 this operator and resches credit credit to less it investing angle by the an intender from the enterior of credit by diffusion or garriers, appropriate on an investing angle by their interdiscreting credit and credit in the credit credit in the credit player is accord. The operator is execting what is receipt of court from in the credit process of courties.			
Regulation SA, Operation of Interactive Gaming Page 3 (Inc. 1019)	Regulation SA, Operation of interactive Gaming Page 4 (fire: 1019)			
4. An operator shall ensure that an authorized player has the ability, through the authorized player's interactive gening account, to select responsible gambling options that include without limitation: (a) Loss time authorizing their not loss that can our within a specified period of time.		1		
(a) Loss serios establishes plan en losa hadi can concrisión a siguridad porció d tene, intereste proprio por los porcios de la composición del la composición de la composición de la composición del	(b) Using an inter-operator politic relationsh except an otherwise aboved by the Commission, or (i) From any official distant, server in the prostypes of twich in operator or its artifacts, or (ii) From any official distant, server in the prostypes of twich in operator or than official and official property of the interest of the commission of the interest of t			
by a day in the extraction of the real control of the control of the policy at the control of th	operator whereby the celebrity player is paid a fixed sum by the operator to engage in interactive gaining and whom may or may not use their own furths to engage in interactive genting. (August 2011. American 1991) and on the property of			
time, and time based exclusion from particles settings. 5. An operation that do after the use of an intensive gaming account established pursuant to this requisition for forms of waggings other than intensive gaming univers. (a) The substitution and an intensive gaming universe. (a) The substitution of the wagging account otherwise meets all of the requirements of registron 5.255, and proposed has been particled by the Chair. (Adopted 12.151. Avenaced 5.073.)	A.145 Progressive payoff schedules. 1. As used in this exticu. (a) "Base amount means the amount of a progressive payoff schedule initially offered before it. (b) "incremental amount" means the difference between the amount of a progressive payoff schedule and its base amount.			
LA 128 Reserve Regularments in Indiation to the reserve impaind pursuant to Regulation 5.225. LA 129 Reserve Regularments in indiation to the reserve impaind pursuant to Regulation 6.125, the operator shall material can be the sum of the Science; 1. 20% of the Science; 2. The fill amount of any progressive pickgrin risked to relevative general; (Adorder S.127). Associated 5173.	(c) "Progressive payoff schedule" means any payoff schedule associated with a game played on an interactive gaming system, including those associated with contests, tournaments or promotions, that			
Troce funds that are not redocuments for cash, and 2. The full amount of any progressive juckgots related to interactive gaming. (Adopted: 1211. Amended: 54. 131. 55. Set if Sert Amended:	3. The amount of a progressive payoff schedule shall be conspicuously displayed outing an authorized players that of a gains to share the payoff schedule payors. Each operate shall exceed the base amount of each progressive payoff schedule when first exposed for play and schedule to each payoff. Explanations for making discussed shall be maintained with the progressives sign. When the reduction is attributable to a payoff, the operator shall record the payoff from number on the log or have the			
6. 100 felf-discipation. 1. Openiors must have any put into effect policies and procedures for self-esculation and table all reasonable stages to immediately refuse service or to otherwise prever or included and to has self-esculated from pertogening in interactive general. These policies and procedures include which interaction the following interactive general. These policies are procedures included which distributes the procedure of the procedure o	A. An operation may change the rate of progression of any progressive payoff schedule provided that records of such changes are created. 5. An operation registed as progressive payoff schedule to an amount that is equal to or greater than the amount of the payoff schedule when the limit is reposed. The operator shall conspicuously provide rates of the limit during an admitrated indexes it start of a name in which the total conduction.			
stemes and mount death of the described mixtude. 10. The united of the intermining amount held by the indicate who has an affiliation. 10. The united of the intermining amount held by the indicate who has an affiliation. 10. Previously previously as notwheld who has see described then being allowed to gave recognition. 10. Operands must like an absorbable steps of their of the intermining to display the parties stem the indicate and extracted	6. An operator shall not reduce the amount of a progressive poyoff schedule or otherwise eliminate a progressive poyoff schedule unless. (a) An authorized beginn the progressive payoff schedule; (b) The operator eliginat the progressive payoff schedule to oneset a methuristion or to prevent the display of an amount greater than a first imposed pursuant to subsection fit, and the operator documents.			
individual self-excluded. 2. Operatives must take all reasonable steps to prevent any marketing material from being sent to an individual who has self-excluded. (Adopted: 1211.)	the adjustment and the reasons for it, or (i) The Chan, you a showing of exceptional circumstances, approves a reduction, elementor, distribution, or procedure not otherwise described in this subsection, which approved is confirmed in writing. 7. Except as otherwise provided by this section, the incremental amount of a progressive payoff schedule is an obligation to the operator's authorized players, and it shall be the responsibility of the schedule in an obligation to the operator's authorized players, and it shall be the responsibility of the schedule in an obligation to the operator's authorized players, and it shall be the responsibility of the schedule in an obligation to the operator's authorized players, and it shall be the responsibility of the schedule in an obligation to the operator's authorized players.			
6A.135 Compensation. Any compensation received by an operator for conducting any game in which the operator is not party to a wager shall be no more than 50% of all sums wagered in each hand. (Adopter 1201.1) 5A.140 Acceptance of Wagers.	The control and modellation on the sea are for agenticity models that is a model. The control are of a properties and prices and its control are control and and are control			
St. 10 Acceptance of Pingers. 1. Operation with red placeter to include a wager: (a) On any game other than the game of poles and its derivatives as approved by the Chair and published in the Sector's studies. (b) On any game which the specializations are reasonably should know in red fatheres includeds. (c) On any game which the specializations are reasonably should know in made by a person on the self-excision site.	A-550 - Monacolom Depulsing of the Wilshin. Quanties and receive to the excellent policy of the Millshing. Quanties are significant on a significant on the significant of the significant on the significant on the significant of the significant on the significant of the significant of significant by Commissional Co			
(d) Firm a person who the operator knows or reasonably should know is placing the wager in violation of state or federal law. Repulation SA, Operation of Interactive Gaming Page 5	A statement that persons located in a jurisdiction where interactive gaining is not legal are not permitted to engage in interactive gaining, and Regulation SA. Operation of Interactive Gaining Page 1019.			
		•		
A Adda Na Markana				
Active links to the following: It is followed to the following: It is followed to explain any lower depends are reached: It Apposition perioding website that is designed to offer information pertaining to responsible gaming; It is black's website. It is a followed to the followed to the control of player to choose to be excluded from engaging in interactive.	lorense for the operation's prospections share of the lorense feet paid by the difficulted conventional tensors present shall deal 2010. 4. For each game in which the operator is not a party to the supply opera revine equals all money received by the operator as compressed to the conducting the query of the query parties for the proposal of present parties for the parties for the proposal of present parties for the proposal parties for the parties for the proposal parties for the p			
parties and its the frozen arises adopted by the operator. As 155 Advertising and Parties and American American arises and the American arises and the American arises and any adopted and consciously in an alequator of a retreation general publishment and promotions. An operator of the parties and adverse to such forms, and promotions and adverse to such forms. An operator in the adverse to such forms, and the adverse to such forms and adverse to such forms.				
work register in any protection relates to interacting garing and ceasily and concerns explain the terms of the parameters and address to such terms. (Adopted: 12/11.) 54.10 Suspections Transaction Report.	Morphise CRYL Amended 1971.) A 188 Residented of Englane. 1. The event fluid are antiferroised player has a disposal with an opposition regarding primarities generally. 1. The event fluid are antiferroised player has a disposal with an opposition regarding primarities generally. 2. Operation has residently invoked the primarities of the regions before all 2003/11 (soot his contribution to extend disposal particing in invoked the general given fluid with the primarities of the EN 2003/11 (soot his contribution of the primarities of the EN 2003/11 (soot his contribution of the EN 2003/11 (soot his cont			
As 400 Supplicios Transaction Septem. In a seal of this series, "variety to a series a threadelin which on operator transaction which on operator transaction which are operator transactions are the playment of it is to determine, offere, environment operator, the season in sequent transactions are considered as the playment of it is not been originated under the product of the playment of the playment of the playment of the foreign of t	provisions of NISS 463.302 to 463.5006 shall agely. 3. Siguices arizing behave authorized splayers which are potentially resolved without Board involvement are ultimately the responsibility of the operator. (Adopted: 12/11.)			
explanation for the transaction where examining the available facts, including the background of the transaction. An operator shall the amport of any suspicious transaction, regardless of the amount, if the operator believes it is relevant to the possible vollation of any law or regulation. The opport is prospection 2 shall be field no later than 30 calendar days after the initial defection by	A 109 Records. In addition to any other record required to the maintained pursuant to the regulation of the remaining of the regulation of the remaining and			
execution. The of the transmission discussions of the execution of the control of the execution of the execu	A. A record or any summings meets our immercend planting account. A. A record and summiny of all person-to-person contact, by telephone or otherwise, with an authorized player. S. Adoptions and withdrawals to an interactive quanting account. S. Adoptions and withdrawals to an interactive quanting account. S. Adoption grams heatery for every game played including the identification of all authorized players and personal players are considered.			
been fleet with the regord. An operator shall make all supporting documentation available to the blood and any appropriate law enforcement agencies upon request. 5. An operator and fill defoors, or footons, or agents who file a report pursuant to this regulation shall not ratify any person involved in the transaction that the tensaction has been reported. (Adopted 1211 Amendeds 119)	And/ore of dept. 1. According to a dept. In a law a law a law of the law of			
5A 170 Gross Reverue License Fees, Attribution, Liability and Computations for Interactive General. 1. Gross revenue received by an establishment from the operation of interactive gaming is subject to the acres license fee provision of AISS 463.370 as the games and gaming devices of the establishment, unless feferal license fees acres to private fees of the stabilishment, unless feferal licenses.	[Adopted: 12/11. Amended: 5/17.) 8.A.200 Grounds for Disciplinary Action. 1. Falue to comply with the previsions of this regulation shall be an unsuitable method of operation and growns for disciplinary action.		 	
The Conference Lawren Paul Services Lawren Conference Lawren Paul Services Lawren Paul Lawren	AL 300. Grounds for Energialency Action. I. Falce for complexity the processor is the regulation shall be an unsubbile method of operation and granuls for disciplinary action. All granuls for disciplinary action, condition, support, curvate or fire any license, engistration, finding of action of the processor	l .	 	
jumeant to the previous of NRS 463.750/S), gross revenue received from the operation of interactive gaming by the difficult is subject to the same locanous fee provisions of NRS 463.370 as the games and gaming provises of the difficult reversablest locanous and table another to the affiliated reversablest locanous and counted as part of the gross revenue of the affiliated reversabled locanous for the purpose of completing the locanous fee, unress below tiles when the provision for a similar the or lax. The operator, if	A-13 Pears of Commission and Basel. 1. The Chair facts the the paper to the one or inferrouting stage order to an operator suggested by the chair of the chair only in the chair of the ch	l .		
receiving all or a share of the revenue from interactive gaming, is fable to the affiliated nonrestricted Regulation SA, Operation of Interactive Gaming Plays 7 (Per 1019)		l .		
2,975	Regulation 5A, Operation of Interactive Gaming Page 8	J		

po p	14.29 Interactive Gazine Services Providers. 1. Fordings. The Commands in early loss of an observation gazine gazine gazine gazine gazine an assess and an activation of the commands of the	Pursuant to statutory and regulatory changes, Nevada recognizes that online gaming requires expertise in several technical areas integral to successful online gaming operations that are not areas in which traditional gaming companies have expertise. These "service providers" to a licensed operator (casino), must go through the non-restricted licensing process, just as terrestrial casino operators and manufactures must.
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Online Gaming in the U.S. – new jersey

In 2013, New Jersey enacted A2578, that permitted casino operators to offer online poker and casino games on an intrastate basis.

The New Jersey law permits casino operators to use internet gaming affiliates to conduct online gaming on behalf of licensees. Internet gaming affiliates are required to be licensed.



Online Gaming in tl	he U.S. – new jersey
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HARD ROCK HOTEL AND CASINO	
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www.nt.bet365.com	

Online Gaming in the U.S. – PENNSYLVANIA

Pennsylvania's Expanded Gaming Act of 2017 officially authorized the operation of online gaming regulated by Pennsylvania Gaming Control Board pursuant to appropriate licensing. Regulated online gaming includes online slot machines, online poker, and online banked table games.

Online Gaming in the U.S. —
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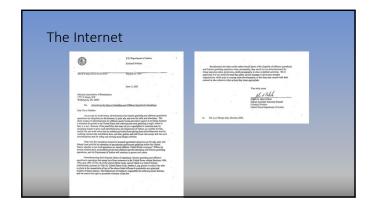
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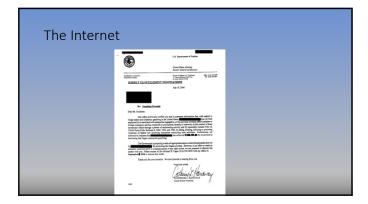
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- David Carruthers
 - Racketeering and Conspiracy 1084 & 1955
 - Scheme to Defraud Mail
 - Use of Communications Facility to Transmit Bets and Betting Information
 - Interstate Transportation of Wagering Paraphernalia
 - Tax Evasion
 - Interference with Administration of Revenue Laws

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Time Marches On

- 2018 The DOJ issues another new opinion regarding the Federal Wire Act
- 2020 The First Circuit Court of Appeals, rejects the application of the new interpretation of the Federal Wire Act against the online lottery products of the New Hampshire State Lottery and its vendor

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