



State of New Jersey

Philip D. Murphy
Governor

Sheila Y. Oliver
Lt. Governor

Office of the Attorney General
Department of Law and Public Safety
Division of Gaming Enforcement
1300 Atlantic Avenue
Atlantic City, NJ 08401

Gurbir S. Grewal
Attorney General

David Rebuck
Director

September 5, 2019

Via Certified Mail, Regular Mail, and E-mail:

Gino Donati
Open Games, LLC
1510 Front Street
San Diego, California 92101
info@betopenly.com

Re: Unauthorized Online Sports Betting
<http://www.BetOpenly.com>

Dear Mr. Donati:

The New Jersey Division of Gaming Enforcement ("Division") is a law enforcement agency in the Office of the Attorney General charged with the responsibility to investigate and prosecute violations of the New Jersey Casino Control Act, N.J.S.A. 5:12-1 et seq. (the "Act"). The Division's investigative and enforcement activities are supported by two other law enforcement agencies in the Office of the Attorney General: the New Jersey State Police, Casino Enforcement Bureau and the New Jersey Division of Criminal Justice, Casino Prosecutions Bureau.

The Division has accessed your website located at <http://www.BetOpenly.com> and found that it offers unauthorized sports betting to New Jersey residents, as well as other United States residents, in violation of the Casino Control Act, N.J.S.A. 5:12-1 et seq., the Unlawful Internet Gambling Enforcement Act of 2006, 31 U.S.C. 5361 et seq. and the Federal Wire Act of 1961, 18 U.S.C. 1081 et seq. In addition, you may be violating the criminal laws of the State of New Jersey. N.J.S.A. 2C:41-1 et seq. (racketeering); N.J.S.A. 2C:37-2 (promoting gambling).



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This letter shall serve as official notice that your website <http://www.BetOpenly.com>, by facilitating and/or accepting unauthorized sports wagers, is engaging in activity that is contrary to New Jersey and federal law. We request that you immediately cease and desist from facilitating wagers between patrons, and place a disclaimer on your site to that effect. The State of New Jersey reserves the right to pursue appropriate civil or criminal sanctions against you if you fail to take the requested actions. Additionally, the Division has also copied the New Jersey Division of Criminal Justice, the California Gambling Control Commission, and the California Bureau of Gambling Control on this letter so that these agencies may consider taking appropriate legal action.

Very truly yours,



Louis S. Rogacki
Assistant Attorney General

LSR/avs

c: Chuck Kimmel, Deputy Attorney General, Division of Gaming Enforcement
Michael Golub, Deputy Attorney General, Division of Gaming Enforcement
Anthony Strangia, Deputy Attorney General, Division of Gaming Enforcement
Christine Hoffman, Deputy Director, Division of Criminal Justice
New Jersey State Police
Stacey Luna Baxter, Executive Director, California Gambling Control Commission
California Bureau of Gambling Control
Casino Counsel
Internet Gaming Counsel