U.S. Department of Justice

Office of Legislative Affairs

Office of the Assistant Attorney General *Washington, DC 20530*

The Honorable John Formella
President
National Association of Attorneys General
Washington, DC 20036

September 10, 2025

Dear Attorney General Formella:

This responds to your letter to the Department of Justice (Department), dated August 4, 2025, regarding illegal offshore gaming operators in your state, as well as in the states and U.S. territories of your fellow attorneys general. The Department appreciates your correspondence and interest in this matter.

The Department takes illegal offshore gaming operators and the related harm they perpetuate seriously and is working diligently to combat them. Specifically, the Department is aware that these unlawful enterprises undermine the rule of law, threaten consumer protection, and deprive states and other jurisdictions of significant tax revenues and economic benefits.

Over the last several years, the Department has successfully prosecuted illegal gaming operators and bookmakers whose additional criminal acts included money laundering, bank fraud, tax evasion, and unlawful internet gambling. The ties between illegal gambling and other criminal activity are well-established, and the Department is committed to addressing these threats.

I. Remedies Available to the Department under Federal Law

The Department is continuously reviewing the mechanisms at its disposal to combat and eradicate emerging and present threats to public safety. The Unlawful Internet Gambling Enforcement Act (UIGEA) provides the Department with various tools that can address illegal gaming operators, including the authority to prosecute businesses and other entities who knowingly accept payments in connection with unlawful internet gambling.[1] This covers a wide range of transactions, including debit card, credit card, and cryptocurrency. Though the Department is not a digital assets regulator, consistent with the Administration's directives and the Department's priorities, investigations and prosecutions involving digital assets are focused on prosecuting individuals who victimize digital asset investors, or those who use digital assets in furtherance of criminal offenses such as terrorism, narcotics and human trafficking, organized

[1] Namely, UIGEA defines "money transmitting business" and "money transmitting service" entities as having the meanings given the terms in 31 U.S.C. § 5330(d).

crime, and cartel and gang financing,[2] many of which are pervasively tied to illegal offshore gaming operators and unlawful internet gambling. Additionally, the Bank Secrecy Act mandates reporting of suspicious activities to protect financial institutions from becoming participants in money laundering activities often benefitting transnational criminal organizations and other criminal or terrorist organizations.[3] Furthermore, asset forfeiture remains a powerful tool for the Department, providing the authority to seize assets obtained from criminal activity, including those of illegal gambling operators. Organized criminal enterprises often use currency in various forms derived from illegal gambling to fund other criminal activities, such as the trafficking of humans, drugs, and weapons,[4] and the Department is working diligently to combat these salient threats to public safety.

II. Cooperative Efforts between Local, State, and Federal Law Enforcement

The Department is committed to not only directly addressing illegal offshore gaming operators, but also empowering states and localities with the resources to aid in addressing them. This includes potential collaboration between federal, state, and local entities, while recognizing that states and other jurisdictions possess a limited capacity to address the presence of illegal operators. The Department's Office of Justice Programs (OJP) has certain resources available for such collaborative enforcement efforts to address illegal offshore gaming operators.

Namely, the Edward Byrne Memorial Justice Assistance Grant Program (JAG program) provides states, tribes, and localities with funding to combat a wide-range of criminal activity. JAG program grant recipients may choose to use funds received from OJP to address illegal gambling, including illegal offshore gaming operators, those conducting illegal gaming activities domestically, and other criminal activity associated with their conduct.[5] These efforts could include funding for task forces consisting of federal, state, and local law enforcement entities dedicated to addressing illegal offshore gaming operators, along with the additional illegal activities related to their conduct in their respective jurisdictions.

In summary, the Department recognizes the threat to public safety and consumers posed by illegal offshore gaming operators, along with those entities who knowingly facilitate illegal transactions between them and consumers. Keeping the American public safe and protecting American consumers from predatory behavior remain key priorities of this Administration and the Department.

The Department is committed to addressing illegal offshore gaming operators and has numerous tools at its disposal in which to disrupt and ultimately eradicate the illegal market. This includes a multi-phased strategy to not only address illegal gambling platforms, but also other criminal activity that is invariably tied to them. These efforts are consistent with the Department's goals of reducing crime and improving public safety.

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[2] Ending Regulation by Prosecution. April 7, 2025.
[3] 31 U.S.C. § 5311.
[4] Crime and Corruption in Sport and Gaming.
[5] 34 U.S.C. § 10151-10158. For additional information about the JAG program, please see: Edward Byrne Memorial Justice Assistance Grant (JAG) Program. November 3, 2022.

We hope this information is helpful. Please do not hesitate to contact this office if we may provide additional assistance regarding this or any other matter.

Sincerely,

Ronald J. Lampard
Deputy Assistant Attorney General

cc:

The Honorable Mike Hilgers
Nebraska Attorney General

The Honorable William Tong
Connecticut Attorney General

The Honorable Andrew Joy Campbell
Massachusetts Attorney General

The Honorable Derek Brown
Utah Attorney General

The Honorable Steve Marshall
Alabama Attorney General

The Honorable Treg R. Taylor
Alaska Attorney General

The Honorable Gwen Tauiliili-Langkilde
American Samoa Attorney General

The Honorable Kris Mayes
Arizona Attorney General

The Honorable Tim Griffin
Arkansas Attorney General

The Honorable Rob Bonta
California Attorney General

The Honorable Phil Weiser
Colorado Attorney General

The Honorable Kathleen Jennings
Delaware Attorney General

The Honorable Brian Schwalb
District of Columbia Attorney General

The Honorable James Uthmeier
Florida Attorney General

The Honorable Christopher M. Carr
Georgia Attorney General

The Honorable Anne E. Lopez
Hawaii Attorney General

The Honorable Raúl Labrador
Idaho Attorney General

The Honorable Kwame Raoul
Illinois Attorney General

The Honorable Todd Rokita
Indiana Attorney General

The Honorable Brenna Bird
Iowa Attorney General

The Honorable Kris Kobach
Kansas Attorney General

The Honorable Liz Murrill
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The Honorable Aaron M. Frey
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The Honorable Anthony G. Brown
Maryland Attorney General

The Honorable Dana Nessel
Michigan Attorney General

The Honorable Keith Ellison
Minnesota Attorney General

The Honorable Lynn Fitch
Mississippi Attorney General

The Honorable Andrew Bailey
Missouri Attorney General

The Honorable Aaron D. Ford
Nevada Attorney General

The Honorable Matthew J. Platkin
New Jersey Attorney General

The Honorable Raúl Torrez
New Mexico Attorney General

The Honorable Letitia James
New York Attorney General

The Honorable Jeff Jackson
North Carolina Attorney General

The Honorable Drew H. Wrigley
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The Honorable Edward Manibusan
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The Honorable Dave Yost
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The Honorable Gentner Drummond
Oklahoma Attorney General

The Honorable Dan Rayfield
Oregon Attorney General

The Honorable Dave Sunday
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The Honorable Peter F. Neronha
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The Honorable Alan Wilson
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The Honorable Marty Jackley
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The Honorable Jonathan Skrmetti
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The Honorable Gordon C. Rhea
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The Honorable Charity Clark
Vermont Attorney General

The Honorable Jason S. Miyares
Virginia Attorney General

The Honorable Nick Brown
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The Honorable John “JB” McCuskey
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Mr. Brian Kane
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