

THE COMMONWEALTH OF MASSACHUSETTS OFFICE OF THE ATTORNEY GENERAL

ONE ASHBURTON PLACE BOSTON, MASSACHUSETTS 02108

Andrea Joy Campbell Attorney General (617) 727-2200 www.mass.gov/ago

June 25, 2025

VIA USPS & ELECTRONIC MAIL

BetOnline.ag c/o Bet Online Ave. Espana & Ricardo Aria Panama City, Panama 08234 info@mail.betonline.ag help@betonlinecs.ag casino@betonline.ag poker@betonline.ag

Re: Unlicensed Online Casino and Sports Betting Operation

To Whom It May Concern:

The Massachusetts Attorney General's Office has become aware that BetOnline.ag ("BetOnline" or "You") is currently or was recently engaged in the business of offering unlicensed online gambling and betting products in Massachusetts without obtaining the required licensure from the Massachusetts Gaming Commission (the "Commission").

It is illegal in Massachusetts to engage in commercial gambling except where expressly authorized by the Commonwealth. Mass. G.L. c. 4, sec. 7 (definition of "illegal gaming"); G. L. c. 23K. BetOnline offers an online casino that includes among its games slots, blackjack, roulette, baccarat, and poker, without any license issued by the Commission under Mass. G. L. c. 23K.

Moreover, Mass. G. L. c. 23N, § 5(a) prohibits engagement in "any activity in connection with sports wagering in the commonwealth unless all required licenses have been obtained." BetOnline has no such licensure, and yet offers sports betting on its platform. Similarly, BetOnline's website permits betting on horse races, but BetOnline does not maintain any horse racing licenses under Mass. G. L. c. 128A or under Mass. G. L. c. 128C.

Further, despite its unlicensed status, BetOnline holds itself out to Massachusetts residents as a legitimate gambling operator. For example, BetOnline almost exclusively depicts U.S. major league teams and players on its webpages and social media platforms and collaborates with U.S. players and U.S. sports-related content creators to promote its platform. The inducement of

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consumers to participate in illegal and unregulated forms of gambling by posing as a legitimate business is a violation of state consumer protection law. *See* 940 CMR § 30.01; Mass. G.L. c. 93A.

Accordingly, You are hereby directed to immediately cease and desist offering Your services to Massachusetts residents or to any person located in Massachusetts and to refund all Massachusetts users in the form of U.S. currency. Failure to cooperate with this demand may subject You to the Attorney General seeking injunctive relief, restitution, civil penalties up to \$5,000 per violation, and the costs of the investigation and litigation.

Sincerely,

Louisa Castrucci Assistant Attorney General

Cc: Justin Stempeck, General Counsel's Office, Mass. Gaming Commission (via email)