

THE COMMONWEALTH OF MASSACHUSETTS
OFFICE OF THE ATTORNEY GENERAL

ONE ASHBURTON PLACE
BOSTON, MASSACHUSETTS 02108

ANDREA JOY CAMPBELL
ATTORNEY GENERAL

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October 3, 2024

VIA USPS & ELECTRONIC MAIL

Harp Media B.V. d/b/a Bovada
Chuchubiweg 17
Willemstad, Curacao

Hove Media d/b/a Bovada
Hamchako, Mutsamudu
Anjouan, Union of the Comoros

service@bovada.lv
disputeresolution@bovada.lv
contact@hove-media.com

Re: Unlicensed Online Casino Operation

To Harp Media B.V. d/b/a Bovada and Hove Media d/b/a Bovada:

The Massachusetts Attorney General's Office has become aware that your companies, Harp Media B.V. d/b/a Bovada and Hove Media d/b/a Bovada (collectively referred to as "You" or "Bovada"), are currently or were 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").

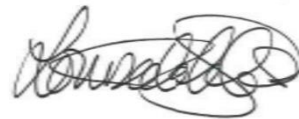
It is illegal in Massachusetts to engage in commercial gambling except where expressly authorized by the Commonwealth. Mass. G.L. c. 4, sec. 7 (definition of "illegal gaming"); G. L. c. 23K. Bovada offers an online casino that includes among its games slots, blackjack, roulette, baccarat, and poker, 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." Bovada has no such licensure, and yet offers sports betting on its platform. Similarly, Bovada's website permits betting on horse races, but Bovada 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, Bovada holds itself out to Massachusetts residents as a legitimate gambling operator. For example, Bovada claims that it is “USA-based,” the “face of the industry,” “America’s No. 1 destination” for sports betting and gambling, and purports to operate responsible gambling, self-exclusion, and anti-money laundering programs. Bovada 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 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,

A handwritten signature in black ink, appearing to read "Louisa Gibbs", written in a cursive style.

Louisa Gibbs
Assistant Attorney General
louisa.gibbs@mass.gov

Cc: Todd Grossman, General Counsel, Mass. Gaming Commission
(via email)