



The Office of
Minnesota Attorney General Keith Ellison
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November 5, 2025

[Business name]

[Address]

[Address]

Re: Illegal Gambling Websites in Minnesota

To Whom it May Concern:

The Office of the Minnesota Attorney General is aware that companies are operating websites that offer illegal gambling in Minnesota. This letter serves as a notice to immediately stop offering such sites to Minnesota residents.

[Business] was notified by the Alcohol and Gambling Enforcement (AGE) division of the Minnesota Department of Public Safety in June 2025 that a sweepstakes-based model of gaming is illegal in Minnesota in violation of Minnesota Statutes § 609.76, subd. 1 & 7. At that time, AGE provided an opportunity for [business] to stop its operations or change its business practices to comply with Minnesota wagering laws.

We write to advise you that, in addition to potential criminal violations, operating an illegal gambling website in Minnesota may also violate State laws prohibiting fraud, unfair or unconscionable practice[s], false pretense, false promise, misrepresentation, misleading statement or deceptive practice. *See* Minn. Stat. § 325F.69, subd. 1. An “unfair or unconscionable act or practice” is defined as, “is any method of competition, act, or practice that: (1) offends public policy as established by the statutes, rules, or common law of Minnesota; (2) is unethical, oppressive, or unscrupulous; or (3) is substantially injurious to consumers.” *Id.* at § 325F.69, subd. 8. The Minnesota Attorney General has authority to enforce these laws by filing a lawsuit seeking injunctive relief, restitution and/or disgorgement of money received related to the operation of illegal gambling websites, civil penalties of up to \$25,000 per violation, and recovery of attorney fees and costs. *See* Minn. Stat. § 8.31, subd. 3 and 3a.

As you know, illegal gambling websites typically feature betting on sports, esports, and horse racing, as well as lotteries, casino games, poker and other games. These sites advertise that consumers may place bets in a variety of games and contests using cash or cryptocurrency. A “bet” is defined in Minnesota law as, “a bargain whereby the parties mutually agree to a gain or loss by one to the other of specified money, property or benefit dependent upon chance although the chance is accompanied by some element of skill.” Minn. Stat. 609.75, subd. 2. Receiving a “bet” is prohibited under Minnesota law. *See* Minn. Stat. 609.76, subd. 1(7).

Minnesota has a well-established system of gambling regulation by law, which permits only limited forms of gambling as enumerated by statute. *See e.g.* Minn. Stat. §§ 349.11 *et seq.*

and 609.75-763. Illegal gambling websites that operate outside of this system contravene the State's strong and longstanding public policy against unregulated gambling.

Illegal gambling sites, particularly those that feature sports betting, mislead Minnesota residents. By patently offering illegal gambling to consumers in Minnesota, these sites deceptively suggest that such activity is legal in Minnesota. Under their rules and terms of service, which the majority of consumers do not read, such sites often unfairly place the onus on a consumer to determine whether gambling is legal in his or her jurisdiction. While sports gambling has been legalized and is regulated in other states, such activity is prohibited in Minnesota; however, the existence of illegal sports gambling sites is likely to lead to consumer confusion.

Finally, these sites are injurious to Minnesota residents because they enable unregulated online gambling while lacking any consumer protections or accountability to ensure players receive the cash or prizes they may win. For example, these sites lack robust age verification measures or tools to allow self-exclusion. Sites often have high "playthrough" requirements or withdrawal thresholds, meaning consumers must wager and win high amounts of money in order to redeem their winnings.

I ask that you confirm in writing that you will refrain from operating an illegal gambling website in Minnesota and otherwise comply with the above-referenced laws by **December 1, 2025**. I ask that you send a written response to [REDACTED] within ten (10) days of receiving this letter.

[REDACTED]
Minnesota Attorney General's Office
445 Minnesota Street, Suite 600
St. Paul, MN 55101-2131
Fax: (651) 282-2155
[REDACTED]

Sincerely,



KEITH ELLISON
Attorney General