

# ALL BETS ARE OFF: HOW A STANDARDIZED REGULATORY SCHEME COULD MEND GROWING SPORTS GAMBLING CONCERNS

## I. FROM PARLAY TO PAYDAY: AN INTRODUCTION INTO THE MULTI-BILLION DOLLAR SPORTS GAMBLING INDUSTRY

As long as sports have been popular in America, there have been swarms of people betting on outcomes. What was once limited to elites picking horses in local races, has now developed into a multi-billion dollar industry with easy options for multiple streams of betting.<sup>1</sup> Since 2018, Americans have bet more than \$220 billion on sporting games.<sup>2</sup> Today, Americans can bet on dozens of sports, ranging from major professional sporting leagues like the NFL and NBA, to traditional sporting events like horse racing, and even newer nuanced options like darts and ping pong.<sup>3</sup> One of the major pushes in this popularity was the expansion of mobile wagering options.<sup>4</sup> Sites such as FanDuel, DraftKings, BetMGM, and Caesars Sportsbooks give consumers a faster and easier option to bet on multiple different games and on different styles of bets, from the comfort of their phones.<sup>5</sup> This is considered a win for participating bettors, for the private corporations running the betting schemes and receiving payout percentages, and also for the state, local, and federal governments who collect taxes on the wagering.<sup>6</sup> While the expansion of sports betting in America has reaped benefits for many, looming concerns stemming from a lack of regulation have persisted throughout its history and pose genuine threats to the industry today.<sup>7</sup>

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<sup>1</sup> See *The History of Sports Betting in the USA*, BORGATA ONLINE SPORTS (May 17, 2023), <https://sports.borgataonline.com/en/blog/history-of-sports-betting-in-the-usa/> (detailing the “long and intricate” history of sports and its intersection, and occasional opposition, to federal gambling laws).

<sup>2</sup> See Wayne Parry, *Americans Bet \$220 Billion on Sports in 5 Years Since Legalization*, PBS (May 8, 2023, 2:58 PM), <https://www.pbs.org/newshour/economy/americans-bet-220-billion-on-sports-in-5-years-since-legalization>

<sup>3</sup> See Chris Sheridan, *What Are People Betting on legally? Follow the Bouncing Pingpong Ball*, THE LINES (Apr. 13, 2020), <https://www.thelines.com/which-sports-can-you-bet-on/>.

<sup>4</sup> See Timothy L. O’Brien & Elaine He, *The Sports Gambling Gold Rush is Absolutely Off the Charts*, BLOOMBERG (Dec. 16, 2021), <https://www.bloomberg.com/graphics/2021-opinion-online-sports-betting-future-of-american-gambling/> (stating the ease at which sports betting has become due to the increase in mobile options, while predicting an “explosive growth” in the industry).

<sup>5</sup> See *id.* (listing the most popular sports betting apps, which all utilize joint ventures to expand engagement).

<sup>6</sup> See *id.* (stating that in the last five years an estimated \$3.6 billion in taxes have been paid out to state, local, and federal government).

<sup>7</sup> See *How Unregulated Sports Betting Sites Feed America’s Gambling Crisis*, KINDBRIDGE BEHAVIORAL HEALTH (July 14, 2023), <https://kindbridge.com/sports-betting/how-unregulated-sports-betting-sites-feed-americas-gambling-crisis/> (listing problems concerning unregulated sports gambling, including poor allocation of tax revenues, illegal operators keeping winning, not properly verifying age and identity, violation of marketing rules, and targeting ads to vulnerable groups).

II. DOUBLING DOWN ON BETTING: BACKGROUND INTO THE SUPREME COURT'S LEGALIZATION OF SPORTS GAMBLING

a. The Professional and Amateur Sports Protection Act

In 1992, Congress enacted the Professional and Amateur Sports Protection Act (“PASPA”) in order to effectively end national sports betting by limiting it to a few states.<sup>8</sup> PASPA specifically outlawed government entities from sponsoring, operating, advertising, promoting licenses, and authorizing by law any wagering schemes that are based on competitive sporting events.<sup>9</sup> It further placed restrictions on a private entities’ ability to be involved in the gambling system, but only if done pursuant to law or compact by a government entity.<sup>10</sup> This did not make sports gambling a federal crime, but instead allowed the Attorney General and other sports organizations the ability to bring civil actions to enjoin statutory violations.<sup>11</sup> While this was designed to create blanket regulations, it was rather seen with wide-spread disagreement, due to the fact that it opened the door for unregulated, underground sports betting.<sup>12</sup> In a scathing 2014 op-ed, NBA Commissioner Adam Silver discussed how the changing views on sports betting since the enactment of PASPA had caused an estimated \$400 billion in illegally wagered sports betting each year.<sup>13</sup> He stressed that the public’s interest in all forms of gambling, including online betting, indicated a need for generalized federal regulation that would ensure the continued integrity of sports.<sup>14</sup>

b. *Murphy v. National Collegiate Athletic Association*

The growing unrest in regards to sports betting culminated in numerous states attempting to overturn PASPA.<sup>15</sup> The issue came to head with the 2018 Supreme Court decision, *Murphy v. NCAA*.<sup>16</sup> There, the State of New Jersey argued, amongst other things, “that PASPA unconstitutionally infringed the State’s

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<sup>8</sup> See S. 474 (102<sup>nd</sup>): *Professional and Amateur Sports Protection Act*, GOV TRACK (Oct. 11, 2018), <https://www.govtrack.us/congress/bills/102/s474/summary> (stating the limitation of sports betting was to include sports lotteries in Oregon, Delaware, and Montana, and also to include licensed sports pools in Nevada).

<sup>9</sup> See 28 USCA § 3702(1) (1992).

<sup>10</sup> See 28 USCA § 3702(2) (1992).

<sup>11</sup> See *U.S. Supreme Court Strikes Down PAFSA, Opening the Door to State-Authorized Sports Gambling*, PROSKAUER (May 17, 2018), <https://www.proskauer.com/alert/us-supreme-court-strikes-down-paspa-opening-the-door-to-state-authorized-sports-gambling>

<sup>12</sup> See Eric Meer, *The Professional and Amateur Sports Protection Act (PASPA): A Bad Bet for the States*, 16 UNIV. NEV.GAMING L. J. 281, 288 (2011) (discussing the Department of Justice’s vehement opposition to PASPA on the grounds that it was a federal invasion of states’ rights and that it allowed sports organizations to seek civil injunction).

<sup>13</sup> See Adam Silver, *Legalize and Regulate Sports Betting*, NYT (Nov. 13, 2014), <https://www.nytimes.com/2014/11/14/opinion/nba-commissioner-adam-silver-legalize-sports-betting.html>

<sup>14</sup> See *id.*

<sup>15</sup> See Jeffrey Roeske, *Doubling Down on Sports Gambling: Why PASPA Would Fail a Constitutional Challenge*, 24 MARQ. SPORTS L. REV. 463, 467–471 (2014)

<sup>16</sup> See *Murphy v. Nat’l Collegiate Athletic Ass’n*, 584 U.S. 453 (2018).

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sovereign authority to end its sports gambling ban.”<sup>17</sup> The Supreme Court sided with New Jersey and held PASPA’s prohibition of state-authorized sports gambling schemes was a constitutional violation.<sup>18</sup> This holding granted states the right to regulate state-level sports betting as they had done prior to PASPA.<sup>19</sup>

### c. Lingering Concerns Following *Murphy*

In the *Murphy* holding, the Supreme Court highlighted the practical concerns with the legalization of sports betting, such that certain policy considerations needed to be evaluated.<sup>20</sup> Concerns over youth gambling addictions, threats to individuals’ finances, and organizational corruption were raised.<sup>21</sup> The Court stated that Congress has the ability to regulate sports betting directly as to address these concerns, but that in the absence of congressional action, states could act individually.<sup>22</sup> To date, however, Congress has failed to step in and create a uniform sports betting regulatory system.<sup>23</sup> Regulations have been implemented on a state-by-state basis.<sup>24</sup> In the past five years there have been thirty-eight states which have passed thirty-eight different laws regarding sports betting, some containing comprehensive and expansive regulations and others being narrow in scope and strength.<sup>25</sup>

## III. AN “ALL IN” SOLUTION: HOW THE CREATION OF A SINGULAR REGULATORY FRAMEWORK WOULD SOLVE CURRENT PATCHWORK BY STATES

### a. Formation of a Singular Regulatory Model

What all thirty-eight state regulations fail to do, is create a uniform measure to protect multiple areas of concern.<sup>26</sup> One way to consider a Congressionally

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<sup>17</sup> See *id.* at 462 (utilizing precedent Supreme Court to argue that PASPA violated the anticommandeering principle in its restriction of the State’s lawmaking power).

<sup>18</sup> See *id.* at 474.

<sup>19</sup> See Ryan Davis, James Havel, & Christopher Schmidt, *Understanding The Implications of Murphy v. NCAA*, JD SUPRA (May 15, 2018), <https://www.jdsupra.com/legalnews/understanding-the-implications-of-72785/#:~:text=The%20Supreme%20Court's%20seminal%20decision,ability%20to%20regulate%20sports%20betting.> (stating that while many believe the *Murphy* ruling legalized national sports betting, the holding merely gave states the option to legalize and regulate the betting themselves).

<sup>20</sup> See *Murphy* 584 U.S. at 486.

<sup>21</sup> See *id.*

<sup>22</sup> See *id.*

<sup>23</sup> See Brian Pempus, *States Where Sports Betting is Legal*, FORBES BETTING (Jan. 29, 2024, 6:00 AM), <https://www.forbes.com/betting/legal/states-where-sports-betting-is-legal/>

<sup>24</sup> See *id.* (stating that sports betting laws consist of a “patchwork of laws and regulation.”).

<sup>25</sup> See Massillon Myers, *MCAA to Begin Advocating for Updated Sports Betting Laws in State Legislatures*, NCAA (Oct. 4, 2023, 12:00 PM), <https://www.ncaa.org/news/2023/10/4/media-center-ncaa-to-begin-advocating-for-updated-sports-betting-laws-in-state-legislatures.aspx>

<sup>26</sup> See Lily Faulconer, *The Danger of Dealer’s Choice: Why State-by-State Regulation of Online Sports Betting is Not Enough*, 21 UNC J. L. & TECH 137, 144–145 (May 1, 2020) (stating that while

proposed sports betting system is to compare it with the standardized gambling regulations.<sup>27</sup> Congress has utilized its powers under the Commerce Clause in order to control interstate gambling.<sup>28</sup> For example, in the wake of internet gambling, Congress passed the Unlawful Internet Gambling Enforcement Act of 2006.<sup>29</sup> This prohibited “gambling businesses from knowingly accepting payments in connection with the participation of another person in a bet or wager that involved the use of the Internet and that is unlawful under any federal or state law.”<sup>30</sup> It further required some participants to create policies and procedures to identify and restrict prohibited activities.<sup>31</sup> In the era of mobile sports betting, the Congressional power to regulate this interstate commerce would allow for a singular federal regulation.<sup>32</sup>

What past examples of federal regulations have in common is that they do not impede states’ abilities to craft their own reforms.<sup>33</sup> They merely create a solid base of security, from which states can further expand, a concept which can be utilized during the formation of sports betting regulations.<sup>34</sup> States with higher rates of sports gambling, like New York and Nevada, will likely need to create stricter, more detailed reforms.<sup>35</sup> States with an average level of sports betting will be able to substantially rely on the ground work set in a standardized framework.<sup>36</sup> This system will create a comprehensive and streamlined approach for all states who

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many states are taking steps to secure sports betting, inconsistencies exist between them with reduce the overall effectiveness).

<sup>27</sup> For further discussion of generalized gambling regulations as is applied to potential sports-specific regulations, see *infra* notes 28–37.

<sup>28</sup> See *Gambling*, CORNELL L. SCH. <https://www.law.cornell.edu/wex/gambling#:~:text=Congress%20has%20used%20its%20power,S tates%20and%20Native%20American%20territories>. (last visited Jan. 27, 2024).

<sup>29</sup> See Brian T. Yeh & Charles Doyle, *Unlawful Internet Gambling Enforcement Act (UIGEA) and Its Implementing Regulations*, CONG. RSCH. SERV. (Apr. 10, 2012), [https://www2.law.umaryland.edu/marshall/crsreports/crsdocuments/RS22749\\_04102012.pdf](https://www2.law.umaryland.edu/marshall/crsreports/crsdocuments/RS22749_04102012.pdf)

<sup>30</sup> See *Unlawful Internet Gambling Enforcement Act of 2006 Overview*, FDIC 1, 1 (2006), <https://www.fdic.gov/news/financial-institution-letters/2010/fil10035a.pdf>

<sup>31</sup> See *id.*

<sup>32</sup> See Michael Alley, *Online Gambling: Interstate or Intrastate Commerce*, RICHMOND J. L. & TECH. <https://jolt.richmond.edu/2022/10/11/online-gambling-interstate-or-intrastate-commerce/> (last visited Jan. 28, 2024) (stating that based on the popularity of VPNs, Congress can easily argue that online gambling is interstate commerce and can thus be federally regulated).

<sup>33</sup> See *Commerce Clause Limitations on State Regulations*, EXPLORING CON. L. <http://law2.umkc.edu/faculty/projects/ftrials/conlaw/statecommerce.htm#:~:text=The%20Commer ce%20Clause%20is%20a,exclusive%20power%20to%20regulate%20commerce>. (last visited Jan. 25, 2024) (stating that the rights granted to Congress from the Commerce Clause are not an express limitation on states’ ability to regulate the economy).

<sup>34</sup> See *id.* (discussing a concurrent power view of the Commerce Clause, such that the federal government and states both have power to regulate commerce, and states’ rights are only disregarded when they preempt the federal law).

<sup>35</sup> See Brant James, *US Sports Betting Revenue Tracker: 2018-2024 State Revenue and Handle*, GAMING TODAY (Jan. 23, 2024), <https://www.gamingtoday.com/revenue/>

<sup>36</sup> See *id.*

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currently have legalized sports betting; and the states which are in the process of legalizing sports betting will have a smoother transition into regulation.<sup>37</sup>

### b. Required Considerations

Sports betting, especially in the mobile form, is an ever changing industry with heightened risks.<sup>38</sup> While a singular regulatory model is the preferred form here, the proposed solution needs to consider a number of major factors.<sup>39</sup> Regulations are vital to ensure the integrity of all sports are maintained.<sup>40</sup> Therefore, there needs to be strict guidelines for betting operators to ensure their legitimacy.<sup>41</sup> This should involve a detailed reporting requirement of procedures and financial statements, along with regular monitoring.<sup>42</sup> Monitoring should be conducted by third party representatives who will check for, amongst other things, illegal bets made by players, personnel, and refs.<sup>43</sup> In recent years, the cases of illegal sports betting has skyrocketed.<sup>44</sup> In 2023, ten NFL players were found to have violated the League's gambling policy, leading to suspensions ranging from six games, to indefinite suspensions.<sup>45</sup> While these were policy violations and did not cross the line to illegal actions, growing concerns about the effects that "insider betting" has on the quality of the game, could be mitigated with transparent reporting and publication of violations.<sup>46</sup>

In viewing this issue from the side of the gambling companies, rather than the gambler, regulation is required to ensure that unknowing bettors are not being

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<sup>37</sup> See Chris Bengel & Shanna McCariston, *U.S. Sports Betting: Here is Where all 50 States Currently Stand on Legalizing Online Sports Betting Sites*, CBS SPORTS (Nov. 17, 2023, 1:47 PM), <https://www.cbssports.com/general/news/u-s-sports-betting-here-is-where-all-50-states-currently-stand-on-legalizing-online-sports-betting-sites/>

<sup>38</sup> See O'Brian et. al, *supra* note 3.

<sup>39</sup> See Silver, *supra* note 13.

<sup>40</sup> See *id.*

<sup>41</sup> See *id.*

<sup>42</sup> See *id.*

<sup>43</sup> See Constantinos Massonos, *Athletes, Match Fixing and Illegal Betting*, SPORTS FIN. LITERACY ACAD. (Dec. 1, 2021) (discussing how the financial benefits from illegal betting leads to match fixing through bribery or blackmail).

<sup>44</sup> See *New AGA Report Shows Americans Gamble More Than Half a Trillion Dollars Illegally Each Year*, AM. GAMING ASSOC. (Nov. 30, 2022), [https://www.americangaming.org/new/new-aga-report-shows-americans-gamble-more-than-half-a-trillion-dollars-illegally-each-year/#:~:text=The%20report%20also%20found%20that,believe%20they%20are%20wagering%20legally.\(referencing%20report%20which%20found%20that%20forty-nine%20percent%20of%202023%20sports%20bettors%20placed%20a%20bet%20with%20an%20illegal%20operator%20most%20of%20whom%20did%20not%20believe%20they%20were%20illegally%20wagering\).](https://www.americangaming.org/new/new-aga-report-shows-americans-gamble-more-than-half-a-trillion-dollars-illegally-each-year/#:~:text=The%20report%20also%20found%20that,believe%20they%20are%20wagering%20legally.(referencing%20report%20which%20found%20that%20forty-nine%20percent%20of%202023%20sports%20bettors%20placed%20a%20bet%20with%20an%20illegal%20operator%20most%20of%20whom%20did%20not%20believe%20they%20were%20illegally%20wagering).)

<sup>45</sup> See Stephen Holder, *Amid Gambling Violations, NFL Players Debate Betting Policy*, ESPN (Aug. 24, 2023, 6:44 AM), [https://www.espn.com/nfl/story/\\_/id/38245548/why-some-players-want-change-nfl-gambling-policy-2023](https://www.espn.com/nfl/story/_/id/38245548/why-some-players-want-change-nfl-gambling-policy-2023) (stating that suspended athletes claimed that they were not familiar with betting policies prior to violations).

<sup>46</sup> See *"Insider Betting" and LeBron James' Right Hand*, NORTON ROSE FULBRIGHT (Apr. 24, 2019), <https://www.nortonrosefulbright.com/en/inside-sports-law/blog/2019/04/insider-betting-and-lebron-james-right-hand> (stating that in viewing this issue from a securities regulation perspective, if someone breaks a fiduciary duty and places a bet based on inside information, and the person giving the insider information receives personal benefit, then insider betting has likely occurred).

scammed.<sup>47</sup> Fake betting websites exist where they take users financial information, allow users to send the money, but then restrict any collection of the earnings.<sup>48</sup> Hackers and cyber scams are prevalent, and since the nature of betting involves personal and financial information, customers who fall for these scams face major risks.<sup>49</sup> Requiring public disclosure of compliant gambling companies would give consumers peace of mind when handing over their personal financial information and would mitigate security risks.

An additional area of concern that is especially prevalent with the new era of mobile betting, is underage gambling.<sup>50</sup> Additional minimum-age verification measures need to be taken by these mobile companies to ensure the legality of their practices.<sup>51</sup> Beyond that, restrictions on targeted sports betting ads to minors need to be implemented as well.<sup>52</sup> There currently exists no federal restrictions on these kinds of ads.<sup>53</sup> Studies have shown that between 60% to 80% of high school students have admitted to gambling for money in the past year.<sup>54</sup> This is due in part to grooming practices by the betting companies and the vulnerable natures of teens.<sup>55</sup>

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<sup>47</sup> See Jason Knowles, *Here's How to Protect Yourself From Sports Betting Scams*, ABC 7 (Nov. 18, 2023), <https://abc7chicago.com/sports-betting-online-scams-better-business-bureau/14080697/#:~:text=According%20to%20the%20Better%20Business,money%20to%20score%20your%20cash.>

<sup>48</sup> See *id.*

<sup>49</sup> See *BBB Alert: Scammers Bet Fans Will Fall For Sports Betting Cons*, POSITIVELY NAPERVILLE (Oct. 28, 2023), <https://www.positivelynaperville.com/2023/10/28/bbb-alert-scammers-bet-fans-will-fall-for-sports-betting-cons/138586#:~:text=You%20run%20the%20risk%20of,money%20but%20valuable%20personal%20information.&text=Avoid%20scam%20sports%20handicappers.,the%20handicapper%20has%20already%20won.>

<sup>50</sup> See Oliver Staley, *An Explosion in Sports Betting is Driving Gambling Addiction Among College Students*, TIME (Dec. 12, 2023, 7:00 AM) <https://time.com/6342504/gambling-addiction-sports-betting-college-students/>

<sup>51</sup> See Richard M., *Regulatory Compliance / Importance of Age Verification on Betting Sites*, SHUFTI PRO (Nov. 20, 2023), <https://shuftipro.com/blog/regulatory-compliance-the-importance-of-age-verification-on-betting-sites/#:~:text=Age%20verification%20is%20implemented%20by,betting%20enterprises%20in%20many%20jurisdictions.> (“Whilst it is not possible to completely prohibit children from gambling, gambling platforms should professionally consider this obligation by enforcing social responsibility laws and age verification in addition to other gambling compliance measures to better discourage underage gambling.”).

<sup>52</sup> See *Sports Betting Advertising Regulation Not Enough to Protect Youth*, KINDBRIDGE BEHAVIORAL HEALTH (Feb. 15, 2023), <https://kindbridge.com/gambling/sports-betting-advertising-regulation-not-enough-to-protect-youth/>

<sup>53</sup> See *id.*

<sup>54</sup> See *Gambling Problems*, McGill <https://youthgambling.mcgill.ca/Gambling2/en/adolescents/adproblems.php> (last visited Jan. 27, 2023).

<sup>55</sup> See *Young Sports Bettors More At-Risk Than Their Predecessors*, KINDBRIDGE BEHAVIORAL HEALTH (Feb. 10, 2023), <https://kindbridge.com/sports-betting/young-sports-bettors-more-at-risk-than-their-predecessors/>

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Finally, while sports gambling has proven to be profitable for many, there lies one major downfall: gambling addictions.<sup>56</sup> Those who may not have been involved in sports betting before can get their foot in the door easily through the use of mobile apps who use enticing advertising and incentivization to bring in these new customers.<sup>57</sup> This introduction, paired with the fact that people are starting to bet at a younger age, has caused the rates of gambling addiction to raise steadily every year.<sup>58</sup> The highest risk demographic for severe sports gambling addiction is younger men, aged eighteen to forty-four.<sup>59</sup> Those in their late teens and early twenties are also more likely to bet beyond their financial abilities, setting them up for long-term financial troubles.<sup>60</sup> Certain federal gambling preventions already occur, namely the Gambling Addiction Prevention Act which requires the development of policies and educational materials on gambling addiction specifically geared towards military veterans.<sup>61</sup> Additional regulations need to be considered at the federal level in order to broaden protections to users who may not understand the damages of sports gambling addiction.<sup>62</sup>

#### IV. A WINNING HAND FOR SPORTS BETTING: LONG-TERM BENEFITS OF A SINGULAR REGULATORY FRAMEWORK

The multi-billion dollar sports betting industry has seen great acceleration in the last five years, with no indication of slowing down any time soon.<sup>63</sup> As more states implement individualized regulations, the degrees of separation between them will continue to expand.<sup>64</sup> Based on the interstate nature of mobile betting, abuse of favorable laws risks the safety of users and legitimacy of the sports.<sup>65</sup> A singular federal framework addressing key concerns would bridge these gaps,

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<sup>56</sup> See *Responsible Gambling Resources for Sports Betting*, NAT'L COUNCIL PROBLEM GAMBLING, <https://www.ncpgambling.org/responsible-gambling/safer-sports-betting/> (last visited Jan. 27, 2024) (“[T]he expansion of legalized sports gambling in the United States will likely increase gambling participation and problems unless the significant steps are taken to minimize harm.”).

<sup>57</sup> See Oliver Barnes, *The Dark Side of the US Sports Betting Boom*, FIN. TIMES (Aug. 10, 2023), <https://www.ft.com/content/2e1a235a-8a46-47f3-b040-5ca21a04ebf4>

<sup>58</sup> See Alex Mitchell, *Young Men Face High Risk For Gambling Addiction as Sports Betting Surges: Experts*, NY POST (Jan. 1, 2024, 3:09 PM), <https://nypost.com/2024/01/01/lifestyle/young-men-face-high-risk-for-gambling-addiction-as-sports-betting-surges-experts/>

<sup>59</sup> See *id.*

<sup>60</sup> See *id.*

<sup>61</sup> See *Gambling Addiction Prevention (GAP) Act*, NAT'L COUNCIL PROBLEM GAMBLING <https://www.ncpgambling.org/advocacy/gap-act/> (last visited Jan. 27, 2024).

<sup>62</sup> See *id.*

<sup>63</sup> See *Online Sports Betting*, STATISTA, <https://www.statista.com/outlook/dmo/eservices/online-gambling/online-sports-betting/united-states#:~:text=Online%20Sports%20Betting%20%2D%20United%20States&text=Furthermore%2C%20it%20is%20estimated%20that,expected%20to%20reach%20US%24256.60>. (last visited Jan. 25, 2024) (predicting that the 2024 sports betting revenue will be \$9.65 and that by 2028 the number of sports betting users will rise to 52 million).

<sup>64</sup> See Rebecca R. Ruiz, Kenneth P. Vogel & Joe Drape, *Why States Were Underprepared for the Sports-Betting Onslaught*, NYT (Nov. 20, 2022), <https://www.nytimes.com/2022/11/20/business/sports-betting-laws-states.html>

<sup>65</sup> See *id.*

making the sports betting industry fair, honest, and transparent, while preserving the integrity of the sports.<sup>66</sup>

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<sup>66</sup> *See id.*