



August 6, 2024

Harp Media B.V. dba Bovada  
Chuchubiweg 17  
Willemstad, Curacao  
Netherlands Antilles

Sent via Email to: [service@bovada.lv](mailto:service@bovada.lv); [disputeresolution@bovada.lv](mailto:disputeresolution@bovada.lv)

**Re: Notice to Cease-and-Desist Offering Online Gambling in Ohio**

Dear Harp Media B.V. dba Bovada:

The Ohio Casino Control Commission (the “Commission”) has become aware that Bovada.lv and Bovada.com, operated by Harp Media B.V. (hereafter referred to as “Bovada”), is offering, participating in the offering, or facilitating those who offer unlicensed or illegal online gaming products in Ohio. These include, but are not limited to, offering an online casino, poker room, or sportsbook in Ohio. For the reasons detailed below, Bovada must cease offering its online gaming products in Ohio.

Under Ohio law, gambling is illegal unless expressly permitted by law. *See* R.C. 2915.02(A)(2),(C). In Ohio, casino gaming is only authorized at four casino facilities, each at a specifically designated land parcel within the cities of Cincinnati, Cleveland, and Toledo, and within Franklin County (Columbus). Bovada is not licensed by the Commission to offer “casino gaming” at any of these locations. Ohio Constitution Article XV, Section 6(C)(9); R.C. 3772.08. Poker is a “table game” and a “game of chance” and must be offered in compliance with Ohio law. R.C. 2915.01(D); 2915.02(A)(2); 3772.01(E)&(Y). Furthermore, online casino gaming, including poker, commonly referred to as “iGaming,” has not been legalized in Ohio. Bovada’s offering of “real money casino games” is clearly in contravention of Ohio law.

Similarly, sports gaming in Ohio also requires licensure. *See* R.C. Chapter 3775. No person shall operate, conduct, or assist in operating or conducting sports gaming in Ohio without first obtaining the appropriate license from the Commission. R.C. 3775.03. Bovada has no such licensure. Therefore, Bovada is violating Ohio law by offering its online sportsbook within Ohio.

Operating an unlicensed casino or sportsbook within Ohio also violates Ohio’s Criminal Code. Both bookmaking, which Bovada’s sportsbook engages in, and operating either a game of chance conducted for profit or scheme of chance, which Bovada’s casino engages in, are strictly prohibited. *See* R.C. 2915.02(A)(1), (2); 3772.99; and 3775.99. Bovada’s numerous, repeated, and clear violations of Ohio law set forth above carry significant administrative, civil and criminal penalties and can constitute both misdemeanor and felony offenses. *See* R.C. 2915.02; R.C. 3772.04, R.C. 3772.99(E)(12) & R.C. 3775.99(B)(9).

Another troubling aspect of Bovada’s online gaming product is the offering to consumers over the age of eighteen. Although Bovada requests those that create an account to “certify” they are “the minimum legal age for gambling in [their] jurisdiction,” Bovada’s “Responsible Gaming” proclamation plainly states that, “Bovada requires all users to be 18 years of age or older.” Bovada’s Terms of Service also states that a person “must be not less than eighteen (18) year of age” to wager. It is a separate criminal offense in Ohio to permit a person under the age of twenty-one to wager at a casino facility or engage in sports gaming. R.C. 3772.99(D) and 3775.99(A).

**Because Bovada is offering unlicensed and illegal online gaming products within Ohio, the Commission demands that Bovada cease and desist from offering, participating in the offering, or facilitating those who offer these products in the State of Ohio. Bovada shall notify the Commission in writing no later than August 16, 2024, that it has complied with this cease-and-desist notice.**

Bovada’s failure to abide by this notice will result in the Commission pursuing all legal remedies and actions against Bovada, including, but not limited to, administrative, civil, or criminal sanctions pursuant to R.C. Chapters 2915, 3772, and 3775, and any rules adopted thereunder.

Sincerely,



Matthew T. Schuler  
Executive Director