



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

DIRECTIVE TO CEASE AND DESIST

March 14, 2025

VIA CERTIFIED MAIL
RETURN RECEIPT REQUESTED
AND E-MAIL

LIEN GAMES RACING LLC
D/B/A RACEBETWIN.COM & OFFTRACKBETTING.COM
Attn: Compliance Department

404 4th Ave. N., Suite 201
Fargo, ND 58102-4844
compliance@liengamesracing.com

AND

P.O. Box 1029
Fargo, ND 58107-1029

Re: Unlicensed & Prohibited Dog Race Wagering

Dear Lien Games Racing LLC:

Please be advised that the Office of the Attorney General for the Commonwealth of Massachusetts ("AGO") has become aware that your company, Lien Games Racing LLC ("You" or "Lien Games Racing"), may currently be or may have recently been engaged in the business of offering wagers on dog races to Massachusetts residents. Accordingly, the AGO directs You to immediately cease and desist from offering any wagers on dog races to Massachusetts residents, as these activities are in direct violation of Massachusetts law.

It is illegal in Massachusetts to engage in commercial gambling except where expressly authorized by the Commonwealth. See Massachusetts General Laws ("G.L.") c. 4, sec. 7 (definition of "illegal gaming"); G. L. c. 23K. Lien Games Racing appears to offer prohibited Advanced Deposit Wagering ("ADW") and/or simulcast wagers on dog races to Massachusetts residents on two of its websites, *RaceBetWin.com* and *OffTrackBetting.com*, and further appears to operate and/or promote ADW and/or simulcast wagers on prohibited dog races to

Massachusetts residents via the *PlayUp.com* racebook (collectively referred to hereafter as the “Websites”).

ADW offerings for dog races are not permitted under Massachusetts law and have not been permitted since 2010. See G.L. c. 128A, sec. 14E, which provides that “all other provisions of this Chapter shall be construed as if they contain no references to dogs, dog racing or dog races.” In addition, even if such ADW offerings were permitted by law, only licensed operators would be able offer them. G.L. c. 128A, sec. 5C. Lien Games Racing does not have a license issued by the Massachusetts Gaming Commission and, therefore, could not lawfully offer ADW on dog racing even if it were permitted.

Massachusetts law further expressly prohibits simulcast transmissions and simulcast wagering on dog racing in the Commonwealth. See G.L. c. 128C, sec. 9. Accordingly, Lien Games Racing may not transmit simulcasts of out-of-state races to Massachusetts residents.

Offering illegal gambling services constitutes an unfair and deceptive trade practice under the Massachusetts Consumer Protection Act, G.L. c. 93A. Any business that “induces consumers to participate in illegal and unregulated forms of gambling by posing as a legitimate business or claiming to offer legitimate sales transactions” is engaged in unfair and deceptive practices. 940 Code Mass. Regs. § 30.01.

You are hereby directed to immediately cease and desist from offering dog race wagers to Massachusetts residents through the Websites or through any other platforms accessible within the Commonwealth. Provide written confirmation within ten (10) business days of your receipt of this letter that You have complied with these directives.

Failure to comply with the terms outlined in this demand may result in legal enforcement action seeking injunctive relief, civil penalties of up to \$5,000 per violation, and costs of the investigation and litigation.

Lien Games Racing LLC
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Please direct any correspondence or confirmation of compliance to my attention at the address listed below.

Sincerely,

/s/ Joshua R. Edlin

Joshua R. Edlin
Assistant Attorney General
MASSACHUSETTS OFFICE OF THE
ATTORNEY GENERAL
Gaming Enforcement Division
Civil Enforcement Unit
One Ashburton Place, 18th Floor
Boston MA 02108

cc:

PlayUp Interactive Inc. (d/b/a PlayUp.com)

Attn: Legal Department

Mailing Address: 304 S. Jones Blvd. #7070, Las Vegas, NV, 89107

Email: help@playupusa.com

Plainville Gaming and Redevelopment, LLC (d/b/a/ Plainridge Park Casino)

Attn: Legal Department

Mailing Address: 301 Washington St., Plainville, MA 02762

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