



Major League Soccer
420 5th Avenue
7th Floor
New York, NY 10018

MLSsoccer.com
212.450.1200

December 11, 2023

Bob Burke, Deputy Administrator of Licensing
Marcus D. Fruchter, Administrator
Illinois Gaming Board
160 North LaSalle
Suite 300
Chicago, Illinois 60601

Re: Major League Soccer Petition to Prohibit Wagering on Yellow and Red Cards in Soccer Matches

Dear Messrs. Burke and Fruchter:

I write on behalf of Major League Soccer (“MLS”), the premiere men’s professional soccer league in North America, and its affiliate MLS NEXT Pro, a lower tier men’s professional soccer league organized and promoted in North America. Per your statute and regulations, a sports governing body may submit a petition to prohibit certain bet types or betting activity.¹ Pursuant to such statute and regulations, MLS, as a sports governing body headquartered in the state of New York, requests that licensed sports wagering operators be prohibited from offering wagers across all retail facilities and mobile platforms on (i) whether a specific soccer player will receive a yellow card or red card penalty during a match or (ii) whether a yellow card or red card will be shown during a match.

Wagers on yellow cards and red cards pose integrity concerns in contravention of public policy goals. Unlike wagers offered on the result of a match or whether a player will score a goal, wagers on yellow cards and red cards are more susceptible to manipulation because a single player can more easily control the outcome of the wager.

Under the International Football Association Board, Laws of the Game 2023/24 (the “Laws of the Game”), offenses that may result in a yellow card include (but are not limited to):

- delaying the restart of play
- dissent by word or action
- entering or deliberately leaving the field of play without the referee’s permission
- unsporting behavior (including feigning injury or pretending to have been fouled, committing fouls in a reckless manner, or touching the ball with hands to interfere with a promising attack or in an attempt to score a goal)
- entering the referee review area
- excessive celebration (including removing the shirt or jersey)

Under the Laws of the Game, offenses that may result in a red card include (but are not limited to):

- denying the opposing team a goal or obvious goal-scoring opportunity
- serious foul play
- biting or spitting at someone
- violent conduct
- using offensive, insulting or abusive language and/or action(s)
- receiving a second yellow card in the same match

The items listed above are within the control of a single player. Yellow cards and red cards are therefore uniquely susceptible to manipulation. Permitting these wagers opens up the possibility of illegal match-fixing organizations targeting players to accept payment in exchange for receiving a yellow or red card or threatening players and their families in order to coerce players into receiving a yellow or red card during a match.

¹ 230 ILCS 45/25-15(g).



Given the global scope of the card-related match-fixing issues, MLS requests that the prohibition on wagering on yellow cards and red cards received by an individual player applies to all soccer matches eligible for wagering, not just MLS soccer matches, as the risks are common across all soccer leagues.

Ultimately, MLS believes permitting wagers on yellow cards and red cards received by an individual player or wagers on whether a yellow card or red card will be shown during a match represents a threat to the policy goals of having a well-regulated and legal sports wagering market.

We welcome the opportunity to discuss this issue further, as you deem necessary. In the event you would like additional information, please feel free to contact me at your convenience.

Sincerely,

Anastasia Danias Schmidt

Anastasia Danias Schmidt
Executive Vice President and Chief Legal Officer