



October 4, 2024

Marcus Fruchter
Administrator
Illinois Gaming Board
160 North LaSalle, Suite 300
Chicago, IL 60601

Charles Schmadeke
Chairman
Illinois Gaming Board
160 North LaSalle, Suite 300
Chicago, IL 60601

Rule 1900.1130 Request to Prohibit Wagering on Injuries, Officiating Related, Player Conduct and Pre-Determined Events in any National Football League Game

Dear Administrator Fruchter, Chairman Schmadeke, and Members of the Illinois Gaming Board:

On behalf of the National Football League (“NFL”) and its member clubs, we appreciate the opportunity to share with the Illinois Gaming Board our perspective on specific legalized sports betting markets offered in Illinois. We look forward to working with the Board to ensure that the potentially harmful or objectionable bet types are not offered in the Illinois market. There is no greater priority for the NFL than protecting the integrity of our games and the welfare of our players. Fans, players, coaches and personnel deserve to know that we are doing everything possible to ensure no improper influences affect how our games are played and that we are taking all appropriate steps to ensure that their participation in our games is not subjected to unfair and unwarranted allegations relating to sports gambling.

Pursuant to Rule 1900.1130, a master sports wagering licensee, professional sports team, league, or association, sports governing body, institution of higher education, or the Administrator may submit to the Board a request to prohibit a type or form of wagering, or wagering on a specific sport, event, league or competition. The National Football League (“NFL”) requests that licensed sports wagering operators be prohibited from offering wagers across all retail facilities and mobile platforms related to the following categories (collectively “objectionable bets”):

1. Player injuries;
2. Fan safety;
3. Player misconduct;
4. Penalties;
5. Replay results i.e. “will the next replay review be overturned?”;

6. Officiating assignments;
7. First play of the game;
8. Roster / personnel decisions;
9. Player to miss a field goal / extra point; and
10. QB's first pass to be incomplete
11. Other bet types that can fall into one of these categories: Pre-determined outcomes directly related to on-field competition; or Based on outcomes 100% determinable by one person in one play.

The NFL seeks to prohibit objectionable bets for several reasons. Inherently objectionable bets represent markets or bets that are inherently derogatory, designed to be inflammatory, or otherwise based on subject matter against public policy (e.g., player injuries, fan safety, misconduct). These markets often are not directly related to gameplay or can have a negative impact on the consumer and player involved. The other categories of objectionable bets represent markets or bets that pose the greatest risk – or perceived risk – to game integrity. These markets or bets relate to officiating, could be knowable in advance (e.g., first play of the game, roster / personnel decisions), or are determinable by one person on one play (e.g., QB's first pass to be incomplete). Unlike wagers offered on the result of a game or specific player performance, these types of wagers are more susceptible to manipulation because a single player/person may more easily control the outcome of the wager. Prohibiting these wagers altogether would complement NFL policies that require game participants, and other NFL personnel, to use their best efforts on the playing field and to protect NFL 'inside information'.


We have studied sports wagering markets in the United States and even internationally to help guide our policies. We have a strong gambling policy in place for our players and personnel, and have even made education and training mandatory. The NFL works closely with sports betting operators, law enforcement, third party vendors and our own security and integrity representatives, to monitor markets and identify threats or suspicious activity. Through this work, key partnerships, and extensive market research, we have shaped our priorities to best position our engagement with state legislators and regulators.

In many states legislators and regulators have identified the threat and integrity risks associated with these bet types and proactively prohibited them in either enacted legislation or the rules established in their regulatory framework. These states include Arizona, Indiana, Iowa, Kentucky, Louisiana, Maine, Massachusetts, Michigan, Ohio, Tennessee, and Vermont.

Thank you again for providing an opportunity for us to submit our comments. We would be happy to meet in the future to discuss our views on sports betting in greater detail. Please contact Jonathan Nabavi [REDACTED] with any questions.

NFL Letter to Illinois Gaming Board October 4, 2024

Sincerely,

A handwritten signature in blue ink, reading "Jon Nabavi". The signature is written in a cursive style with a period at the end.

Jonathan D. Nabavi
Vice President, Public Policy and Government Affairs
National Football League