

January 31, 2024

Iowa Code section 80.25A directs the Commissioner of public safety to establish a subdivision with the Division of Criminal Investigation (DCI) "to be the primary criminal investigative and enforcement agency for the purpose of" enforcing Iowa's gambling laws. Historically, these agents have worked in Iowa's 19 casinos. With the legalization of sports betting in 2019 and its rapid growth since betting became legal on digital devices, DCI now has six agents dedicated to sports gambling. In 2023 alone, \$2.4 billion in sports bets were placed in Iowa.

The evolution of gaming has given rise to emerging technologies that help regulate the industry and enforce the law. Iowa Administrative Rule 491-13.5 requires "the sportsbooks to implement location detection procedures to reasonably detect and dynamically monitor the location of a player attempting to place any wager" and to notify accountholders about information being gathered and shared.

Additionally, Iowa Code section 99F.7A requires sports wagering licensees to "employ reasonable steps to prohibit coaches, athletic trainers, officials, players, or other individuals who participate in an authorized sporting event that is the subject of sports wagering, from sports wagering."

Analytical software programs developed by the licensees that provide mapping and anonymized data points were made available to the DCI to help identify anomalies suggesting suspicious or criminal activity that could undermine sports gambling in Iowa and ensure regulatory compliance.

Prior to using the tools provided, the Department of Public Safety conferred with legal counsel to ensure lawful access to and use of the technology. Two county attorney offices also reviewed all relevant investigative information before making the ultimate decision to file charges.

The Department traditionally does not comment on active investigations or litigation in an effort to ensure these matters are appropriately addressed by our justice system rather than the media. We believe the evidence was obtained in a constitutionally permissible manner. Ultimately it is up to the courts to decide. We want to reassure Iowans that the Department always strives to scrupulously uphold the laws and constitutions of the United States and the State of Iowa.