



STATE OF CONNECTICUT
DEPARTMENT OF CONSUMER PROTECTION

DECLARATORY RULING IN RESPONSE TO PETITION

Pursuant to Connecticut General Statutes § 4-176 and the Regulations of Connecticut State Agencies § 21a-1-10, I am issuing this Declaratory Ruling concerning prohibited sports wagering under Chapter 229b of the Connecticut General Statutes in response to a request dated December 11, 2023 from Major League Soccer (“MLS”) and its affiliate MLS NEXT Pro. MLS is the sports governing body for professional men’s soccer in the United States. The request from MLS is attached as Exhibit A.

MLS identified concerns over wagering on whether a specific soccer player will receive a yellow card or red card penalty during a match or whether a yellow card or red card will be shown during a match. Their request to the Department of Consumer Protection (“Department”) is pursuant to Connecticut General Statutes Sec. 12-864, which authorizes a sports governing body to request the Commissioner of Consumer Protection consider limitations on certain sports wagering activity that may compromise the integrity of wagering in the state, as specifically set forth below:

(f) A sports governing body may request that the commissioner restrict, limit or exclude wagering on a sporting event or events by providing notice in such form and manner as the commissioner prescribes. The commissioner may take such action as the commissioner deems necessary to ensure the integrity of wagering on such sporting event or events.

MLS has requested that the Department prohibit online gaming operators and sports wagering retailers from offering wagers 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. They raise concerns of fraud and potential manipulation of sports outcomes through offenses that are player-controlled, as set forth below and in Exhibit A:

“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.”

Review of the marketplace has revealed that there have been past instances where serious concerns about market manipulation have been raised, which support the concerns about permitting this type of wagering in the Connecticut wagering market.¹

¹ <https://www.tomharris.org.uk/football/could-yellow-card-betting-be-banned-as-part-of-a-spot-fixing-crackdown/> and <https://bleacherreport.com/articles/10024639-report-bookmaker-flagged-420k-worth-of-bets-placed-on-arsenal-yellow-card>




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Based on the forgoing, in order to protect the integrity of gaming and the market in the state of Connecticut, I hereby rule as follows:

Wagers based on the issue of a yellow or red card to a player or manager for an offense or violation of the rules in connection with a soccer match, soccer competition, or soccer tournament are prohibited.

All gaming licensees shall remove all markets prohibited by this ruling from their sportsbook within two (2) business days of its issue. Any wagers accepted prior to the issue of this ruling shall be permitted to stand.

Dated this 30th day of January, 2024



Bryan Cafferelli
Commissioner
Department of Consumer Protection



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

MLSsoccer.com
212.450.1200

December 11, 2023

Walter Wilkowski, Gaming Regulation Supervisor
Kristofer Gilman, Director
Connecticut Department of Consumer Protection-Gaming Division
450 Columbus Boulevard
Hartford, CT 06103

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

Dear Messrs. Wilkowski and Gilman:

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 Conn. Gen. Stat. Ann. § 12-864(f).



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