

Defendant: ISAIAH LEE

CASE NO.: 2023010880

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IN THE  
IOWA DISTRICT COURT FOR STORY COUNTY

STATE OF IOWA

VS

ISAIAH M LEE

Defendant

Before the Presiding  
Judge or Magistrate

Iowa District Court

DOB: 09/19/1999

SSN: [REDACTED]

Address: 2222 STORM STREET

AMES, IA 50014

Criminal No. 2023010880

COMPLAINT

The Defendant, ISAIAH M LEE

is accused of the crime of **TAMPERING WITH RECORDS**,

in that the Defendant did, on or between the dates of 09/21/2021-01/22/2023, in STORY County, Iowa, **DID KNOWINGLY AND INTENTIONALLY FALSIFY PERSONAL ELECTRONIC SPORTS WAGERING RECORDS BY CONCEALING HIS PERSONAL IDENTITY IN SAID RECORDS WITH THE INTENT TO DECEIVE OR CONCEAL A WRONGDOING KNOWING HE HAD NO PRIVILEGE OR RIGHT TO DO SO**,

in violation of Section 715A.5

of the Iowa Criminal Code.

Brian Sanger I-160  
Signature

Subscribed in my presence and sworn to before me this 10<sup>th</sup> of August, 2023.



[Signature]  
Notary Public, State of Iowa

STATE OF IOWA) ss. ISIAIAH LEE

STORY County)

### AFFIDAVIT

The undersigned, being first duly sworn, states the following in support of probable cause to believe the offense charged hereon has been committed and that the Defendant has committed it:

In 2018, the Professional and Amateur Sports Protection Act (PASPA), also known as the Bradley Act, was judicially overturned by the United States Supreme Court. This landmark decision effectively eliminated federal restrictions, allowing for the legalization of sports wagering. Consequently, individual states were granted the authority to legalize and regulate sports wagering within their jurisdictions. Iowa joined this movement in May 2019, becoming the 11th state in the nation to legalize sports wagering. Currently, there are nineteen licensed sportsbooks operating in the State of Iowa.

In Iowa, authorized sports wagering operates within a framework defined by specific state laws, rules, and regulations. Private companies offering sports wagering services must obtain a license to operate from the Iowa Racing and Gaming Commission (hereafter referred to as IRGC). Licensed sports wagering companies are required to adhere to a comprehensive set of regulations drafted by IRGC, which aims to ensure the integrity of gambling activities and facilitate proper taxation (IAC 491-13.1(99F)). IRGC is also responsible for approving the "Terms of Use" drafted by licensed sports wagering companies, which establishes enforceable conditions for customers who utilize their wagering platforms. Licensed companies are expected to make reasonable efforts to enforce procedural safeguards and prevent unacceptable and unlawful activities on their platforms.

Iowa code chapters 99F and 99E detail several criminal prohibitions pertaining to sportsbook and fantasy sports wagering. Any actions that could potentially manipulate or alter the outcome of a game or contest, thereby compromising the integrity of wagering lines, are prohibited.

Iowa code Chapter 80.25A designates the Iowa Division of Criminal Investigation (DCI) as the primary criminal investigative and enforcement agency for the purpose of enforcement of chapters 99D, 99E and 99F. Additionally, the DCI routinely assists gaming authorities by investigating and reporting violations of gaming rules and regulations established by the IRGC. As part of their regular duties, DCI agents also conduct background investigations on licensed gambling companies and their operations.

All sportsbook operators have developed user terms that must be accepted by every customer during the account registration process. To use services provided by the operator, all users must acknowledge they will abide by terms which prohibit the following:

- a) Wagering by a coach, athletic trainer, official, player, or any other individual participating in an authorized sporting event where wagers are accepted
- b) Wagering by a person employed (both paid or volunteer) in positions that involve direct contact with coaches, players, athletic trainers, officials, athletes, or participants in an authorized sporting event where wagers are accepted.
- c) Wagering as an agent or proxies for others.
- d) Wagering in the sport that the customer is an athlete or an affiliated participant. This also includes professional or amateur athletes, sports agents, coaches, team owners, team employees, referees, or league officials, and their immediate family members.
- e) Wagering by individuals under 21 years of age

In early 2023, an investigation initiated by agents with the Iowa Division of Criminal Investigation (DCI) uncovered evidence of ISIAIAH LEE conducting illicit wagering activities on the FanDuel sportsbook platform. ISIAIAH LEE was a football player for Iowa State University during the 2018-2019, 2019-2020, 2020-2021, 2021-2022, 2022-2023 seasons.

ISIAIAH LEE engaged in a scheme with KAYLA COGGESHALL CAMERON enabling LEE to disguise his identity and manipulate online/mobile transactions to create the appearance that sports wager transactions conducted by LEE were made by CAMERON.

This deception enabled ISIAIAH LEE to conceal his unlawful gambling activities from law enforcement and other regulatory bodies.

His actions contravened various legal and regulatory frameworks, including:

A) Violation of licensed Sportsbook User Terms and Conditions: ISALIAH LEE's wagers on FanDuel also violated the platform's User's Terms, as well as rules and regulations administered by the Iowa Racing and Gaming Commission. FanDuel explicitly prohibits individuals from signing up for an account while underage or utilizing the service under another's name.

B) Breach of University and NCAA Policies: ISALIAH LEE's use of an account associated with a non-athlete individual allowed him to circumvent scrutiny and sidestep university and NCAA policies regarding student-athlete sports wagering conduct. By using the identity of another, ISALIAH LEE was able to avoid detection and the potential consequences of participation in prohibited activity.

C) Unfair Wagering and Conflict of Interest: ISALIAH LEE placed bets on games and events sponsored by the NCAA. LEE placed 21 wagers on Iowa State University Football events while he was a Iowa State Football player. This raised concerns regarding unfair wagering advantages, potential access to insider knowledge of athletic participants, and the potential for collusion-related activities.

D) Tax Implications: ISALIAH LEE's fraudulent activities also shielded him from potential state and federal tax implications. By concealing his identity during his sports wagering transactions, any tax responsibilities would fall on the stand-in's name listed on the account.

When placing wagers on the FanDuel platform, an individually unique "Wager Identifier" digital record is generated. This number is a digital record utilized by FanDuel to distinguish one wager from all others. Each wager placed by FanDuel generated a "Wager Identifier" digital record. Each "Wager Identifier" identified below correspond to a specific timestamped wager placed by LEE. The "Wager Identifier" listed are not all inclusive of LEE's sports wagering activity; however, they all meet the following conditions:

- 1) Wagers routinely and consistently placed from ISALIAH LEE's personal iPhone.
- 2) Wagering transactions that required possession of ISALIAH LEE's iPhone to unlock and access his FanDuel account using a specific username and password.
- 3) Corresponded to ISALIAH LEE's known locations, including his university residence and areas of the university not routinely open to the public
- 4) Involved prohibited wagering activity related to sporting events, such as NCAA-sanctioned contests and events sponsored by the Iowa State Athletic Department.
- 5) Transacted within STORY County, Iowa.

The following "Wager Identifier" digital records were transacted on an iPhone controlled by ISALIAH LEE utilizing the name KAYLA CAMERON and the FanDuel account of 13749049.

**FanDuel Wager Identifiers:**

27382480.53  
27379793.53  
26949729.53  
14362591.53  
14157872.53  
9159855.526  
9159822.526  
4094697.526  
3496669.526

According to subpoenaed records, this FanDuel account (13749049), which was controlled by ISALIAH LEE, completed 115 mobile/online sports wagers totaling over \$885. The account made 21 wagers involving the following Iowa State University Football events which LEE participated in:

10/16/2021	Iowa State at Kansas State
10/23/2021	Oklahoma State at Iowa State
11/06/2021	Texas at Iowa State – Moneyline Wager for Texas and against Iowa State

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11/13/2021	Iowa State at Texas Tech
11/20/2021	Iowa State at Oklahoma
11/26/2021	TCU at Iowa State
12/29/2021	Iowa State at Clemson
09/03/2022	SE Missouri at Iowa State
09/10/2022	Iowa State at Iowa
09/17/2022	Ohio at Iowa State
09/24/2022	Baylor at Iowa State
10/01/2022	Iowa State at Kansas

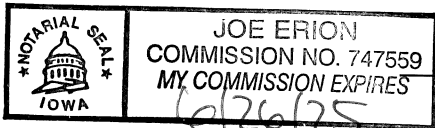
ISAIAH LEE and KAYLA CAMERON were both interviewed, and both were cooperative with DCI investigators. LEE acknowledged he had created a FanDuel account utilizing his fiancée's, KAYLA CAMERON, personal information.

CAMERON acknowledged LEE had a FanDuel account in her name and that it was improper for LEE to place bets because he is an NCAA athlete. CAMERON told DCI investigators she does not have a betting application on her phone and has never placed a sports bet.

Brian Sanger I-160

Affiant

Subscribed and sworn to before me this 10<sup>th</sup> day of August, 2023.



Joe Erion

Notary Public, State of Iowa

The foregoing Complaint with attached affidavit having been filed before the undersigned, it appears from said Complaint and Affidavit that there is probable cause to believe an offense has been committed and that the Defendant committed the offense.

Dated this \_\_\_\_\_ day of \_\_\_\_\_, 2023.

BY THE COURT:

\_\_\_\_\_  
Judge/Magistrate