

Defendant: JACK JOHNSON

CASE NO.: 2023008987

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IN THE

IOWA DISTRICT COURT FOR JOHNSON COUNTY

STATE OF IOWA

VS

JACK THOMAS JOHNSON

Defendant

Before the Presiding
Judge or Magistrate

Iowa District Court

DOB: 06/15/2001

SSN: [REDACTED]

Address: 717 KESWICK DRIVE

IOWA CITY, IOWA 52246

Criminal No. 2023008987

COMPLAINT

The Defendant, **JACK THOMAS JOHNSON**

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

in that the Defendant did, on or between the dates of **09/03/2021 – 01/28/2023**, in Johnson 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 10th of August, 2023.

[Signature]
Notary Public, State of Iowa

STATE OF IOWA) ss. JACK JOHNSON

Johnson 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. Persons under the age of 21 are prohibited from participating in gambling activities within the state. Individuals are also prohibited from knowingly allowing someone under the age of 21 to place wagers in the state. 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

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

JACK JOHNSON engaged in a scheme with his mother, JILL JOHNSON, enabling JACK JOHNSON to disguise his identity and manipulate online/mobile transactions to create the appearance that sports wager transactions conducted by JACK JOHNSON were made by JILL JOHNSON.

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

His actions contravened various legal and regulatory frameworks, including:

- A) Underage Gambling: JACK JOHNSON placed wagers while underage, in violation of Iowa's gambling laws. He employed a proxy account registered in the name of his mother who was over the legal age of 21. JOHNSON turned 21 on June 15, 2022. JOHNSON completed over 380 mobile/online sports wagers that collectively totaled over \$1,800 while underage.
- B) Violation of licensed Sportsbook User Terms and Conditions: JACK JOHNSON'S wagers on DraftKings also violated the platform's User's Terms, as well as rules and regulations administered by the Iowa Racing and Gaming Commission. DraftKings explicitly prohibits individuals from signing up for an account while underage or utilizing the service under another's name.
- C) Breach of University and NCAA Policies: JACK JOHNSON'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, JACK JOHNSON was able to avoid detection and the potential consequences of participation in prohibited activity.
- D) Unfair Wagering and Conflict of Interest: the account controlled by JACK JOHNSON placed bets on games and events sponsored by the NCAA. The account controlled by JOHNSON placed four wagers University of Iowa football events while he was an athlete on the Iowa Football team. Additionally, the account controlled by JOHNSON placed wagers on University of Iowa basketball events. This raised concerns regarding unfair wagering advantages, potential access to insider knowledge of athletic participants, and the potential for collusion-related activities.
- E) Tax Implications: JACK JOHNSON'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 DraftKings platform, an individually unique "Bet Ticket IDs" digital record is generated. This number is a digital record utilized by DraftKings to distinguish one wager from all others. Each wager placed by DraftKings generated a "Bet Ticket IDs" digital record. Each "Bet Ticket IDs" identified below correspond to a specific timestamped wager placed by JOHNSON. The "Bet Ticket IDs" listed are not all inclusive of JOHNSON's sports wagering activity; however, they all meet the following conditions:

- 1) Wagers routinely and consistently placed from JACK JOHNSON's personal iPhone.
- 2) Wagering transactions that required possession of JACK JOHNSON's iPhone to unlock and access his DraftKings account using a specific username and password.
- 3) Corresponded to JACK JOHNSON'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 University of Iowa Athletic Department.
- 5) Transacted within Johnson County, Iowa.

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The following "Bet Ticket IDs" digital records were transacted on an iPhone controlled by JACK JOHNSON utilizing the name JILL JOHNSON and the DraftKings account of 10895448423.

DraftKings Bet Ticket IDs:

9473949069
9473941586
9460308337
4451196046
4451311969
3882222374
2147467955
1328815186
1328830526
1172624218
1172517534
867446712

According to subpoenaed records, this DraftKings account (10895448423), which was controlled by JACK JOHNSON, completed over 480 mobile/online sports wagers. These sports wagers collectively totaled over \$2,500. Over 380 of these sports wagers, totaling over \$1,800, were placed before JACK JOHNSON became the legal age to wager in Iowa. The account placed at least eleven wagers on University of Iowa basketball events and four wagers on University of Iowa Football events. The four Iowa Football wagers were placed on Iowa Football games against Wisconsin in 2021 and Illinois in 2022 while he was a member of the Iowa Football team.

Brian Sanger I-160

Affiant

Subscribed and sworn to before me this 10th day of August, 2023.



[Signature]

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 August, 2023.

BY THE COURT:

Judge/Magistrate