

Defendant: JIREHL L BROCK

CASE NO.: 2023010890

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IN THE
IOWA DISTRICT COURT FOR STORY COUNTY

STATE OF IOWA

VS

JIREHL L BROCK

Defendant

Before the Presiding
Judge or Magistrate

Iowa District Court

DOB: 10/18/2000

SSN: [REDACTED]

Address: 3818 MARIGOLD DRIVE

AMES, IOWA 50014

Criminal No. 2023010890

COMPLAINT

The Defendant, **JIREHL L BROCK**

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

in that the Defendant did, on or between the dates of **02/11/2022 – 02/13/2023**, 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 10th of August, 2023.



[Signature]
Notary Public, State of Iowa

STATE OF IOWA) ss. JIREHL L BROCK

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 JIREHL BROCK conducting illicit wagering activities on the FanDuel sportsbook platform. JIREHL BROCK

attended Iowa State University and was a player on the football team during the 2019-2020, 2020-2021, 2021-2022, and 2022-2023 seasons.

JIREHL BROCK engaged in a scheme with LINDZEY PAYSEN enabling BROCK to disguise his identity and manipulate online/mobile transactions to create the appearance that sports wager transactions conducted by BROCK were made by PAYSEN.

This deception enabled JIREHL BROCK 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: JIREHL BROCK'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: JIREHL BROCK'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, JIREHL BROCK was able to avoid detection and the potential consequences of participation in prohibited activity.
- C) Unfair Wagering and Conflict of Interest: the account controlled by JIREHL BROCK placed thirteen wagers on Iowa State basketball events and four wagers on Iowa State football events while a player on the Iowa State Football team. The Iowa State football wagers included Texas Tech at Iowa State (11/19/2022), Kansas State at Iowa State (10/08/2022) and two wagers on Iowa State at Iowa (09/10/2022). 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: JIREHL BROCK'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 BROCK. The "Wager Identifier" listed are not all inclusive of BROCK's sports wagering activity; however, they all meet the following conditions:

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

The following "Wager Identifier" digital records were transacted on an iPhone controlled by JIREHL BROCK utilizing the name LINDZEY PAYSEN and the FanDuel account of 18832209.

FanDuel Wager Identifiers:

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28519865.53
 27389647.53
 27378913.53
 26959247.53
 26959236.53
 26956928.53
 26956897.53
 26956180.53
 26953866.53
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 26939444.53

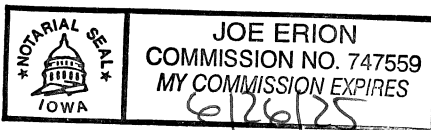
According to subpoenaed records, this FanDuel account (18832209) which was controlled by JIREHL BROCK completed 1,327 mobile/online sports wagers. These sports wagers collectively totaled over \$12,050. The account placed thirteen wagers on Iowa State basketball events, and four wagers on the following Iowa State University football games, including two games in which BROCK participated in:

Iowa State at Iowa (09/10/2022) – Two Wagers – Participated as a player.
 Kansas State at Iowa State (10/08/2022) – Participated as a player.
 Texas Tech at Iowa State (11/19/2022)

Brian Sanger I-160

Affiant

Subscribed and sworn to before me this 10th 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