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IN THE CIRCUIT COURT OF WHITE COUNTY, ARKANSAS
CIVIL DIVISION

STATE OF ARKANSAS, *ex rel.*
TIM GRIFFIN, ATTORNEY GENERAL **PLAINTIFF**

v. **CASE NO.** 73CV-26-1743

VGW HOLDINGS U.S. INC,
VGW U.S. INC., VGW LUCKYLAND, INC.,
VGW HOLDINGS PTY LTD., VGW LTD.,
VGW MALTA LTD,
VGW MALTA HOLDING LIMITED,
VGW GAMES LIMITED, VGW GP LIMITED,
BEELS LIMITED **DEFENDANTS**

COMPLAINT

I. INTRODUCTION

1. Through websites like Chumba Casino, LuckyLand Casino, LuckyLand Slots,[1] and Global Poker, consumers play slot machines, blackjack, poker, and other casino games for real money. But Defendants, who own, operate, and control each of these websites, insist this activity is not gambling.

2. This "not gambling" conclusion rests on an artificial distinction between two virtual currencies, one valuable and one effectively worthless.

3. The currency that matters is called "Sweeps Coins." Sweeps Coins can be wagered

[1] LuckyLand Slots ceased operations in the United States in September 2026. Prior to ceasing operations, LuckyLand Slots conducted business in Arkansas as described in this Complaint.

on casino games, won or lost through gameplay, and ultimately redeemed for cash—functioning like a traditional poker chip. The other currency is called "Gold Coins." Gold Coins have no value outside VGW platforms and cannot be exchanged for cash or prizes.

4. Consumers do not buy Sweeps Coins independently. Instead, consumers buy Gold Coins and receive Sweeps Coins for "free" as a bonus. Defendants characterize this arrangement as a sweepstakes. In substance, however, consumers pay money, receive Sweeps Coins, and use those Sweeps Coins to play casino-style games for the chance to win additional Sweeps Coins redeemable for cash. Gold Coins provide the extra step Defendants rely on to transform, at least in name, a purchase of gambling currency into a "free" sweepstakes. While Defendants may think this distinction is clever, it is not legal. Arkansas law does not allow a gambling operator to insulate itself from the State's gambling regulations simply by adding an extra step, changing a name, or inventing a new device.

5. Defendants' own data exposes the fiction. [redacted] A consumer who pays $20, for example, can receive 20.50 Sweeps Coins. Because each Sweeps Coin is redeemable for one U.S. dollar, the consumer pays $20 and receives $20.50 in the currency that can actually be gambled for real money.

6. So while Defendants may call Sweeps Coins "free," the overwhelming majority are distributed when consumers pay Defendants money. The more consumers pay, the more gambling currency they receive. Defendants have built a multibillion-dollar business around that distinction.

7. And Defendants have marketed that fiction aggressively. They call their websites social casinos, repeatedly advertise their casino games as free, and even assure consumers that

playing is 100% safe and 100% legal.

8. Defendants know the legal status of their business is not nearly as clear as their advertising suggests because the playbook they follow is an old one. Decades before Defendants launched their platforms, Internet sweepstakes cafes promoted a remarkably similar arrangement. Consumers paid money for internet time, received "free" credits, and used those credits to play games for the chance to win cash prizes. When challenged, the cafes argued that consumers were paying for internet time, not the opportunity to gamble. Courts repeatedly rejected the attempt to circumvent gambling laws by calling the activity a sweepstakes.

9. The similarities are not a coincidence. Before launching, Defendants' executives studied internet sweepstakes cafes extensively. They then designed their business around a modern version of the same model, changing the names and moving the casino online. But changing the packaging did not change the underlying transaction. It is still gambling, and it is expressly prohibited under Arkansas law. *See, e.g.*, Ark. Const. amend. 100; Ark. Code Ann. § 5-66-101 et seq.

10. Arkansas permits casino gambling only within a narrowly regulated framework established by Amendment 100. Defendants operate entirely outside that framework while offering Arkansas consumers the same core casino games. Defendants hold no Arkansas casino license and have never been authorized to conduct casino gaming in this State. And unlike Arkansas's licensed casinos, Defendants' gaming platforms are available anywhere an internet connection is available, including in the hands of minors or young adults between the ages of 18 and 21.

11. While masquerading as a free sweepstakes, Defendants accepted money from Arkansans, provided them the means to gamble, and paid out winnings in cash and other prizes.

[redacted]

12. Attorney General Tim Griffin brings this action to stop Defendants' illegal gambling operations in Arkansas, recover money unlawfully obtained from Arkansas consumers, hold Defendants accountable for their deceptive and unconscionable practices, impose civil penalties, and obtain all other relief available under Arkansas law. Specifically, Defendants:

a. Misrepresented that their products were legal, safe, and free social-gaming products when they functioned as online casinos offering casino-style gambling for real money in violation of Ark. Code Ann. § 4-88-107(a)(1);

b. Engaged in unconscionable conduct by operating unlawful gambling products outside Arkansas's regulated gaming framework while disguising that conduct as a sweepstakes promotion in violation of Ark. Code Ann. § 4-88-107(a)(10);

c. Obtained money from Arkansas consumers under false pretenses by representing that consumers were legally purchasing a valueless entertainment product when, in reality, Defendants' business depended on the distribution and use of Sweeps Coins redeemable for cash, in violation of Ark. Code Ann. § 4-88-108(a)(2); and,

d. Were unjustly enriched by retaining money obtained through unlawful gambling activity and transactions that are void under Arkansas law.

II. PARTIES

13. Plaintiff is the State of Arkansas, *ex rel.* Tim Griffin, Attorney General. The Attorney General brings this action as the State's chief legal officer charged with civil enforcement of the Arkansas Deceptive Trade Practices Act ("ADTPA"), Ark. Code Ann. § 4-88-101 et seq.

14. Defendant VGW Holdings U.S. Inc. ("VGW Holdings") is a Delaware corporation with its principal place of business at 1881 9th Street, Suite 2002, Boulder, CO, 80302. VGW Holdings also maintains an office at 442 Post Street, Suite 900, San Francisco, CA 94102.

15. Defendant VGW U.S. Inc. ("VGW U.S.") is a Delaware corporation with its principal place of business at 1881 9th Street, Suite 2002, Boulder, CO, 80302. VGW U.S. also

maintains an office at 442 Post Street, Suite 900, San Francisco, CA 94102.

16. Defendant VGW Luckyland, Inc. ("VGW Luckyland") is a Delaware corporation with its principal place of business at 1881 9th Street, Suite 2002, Boulder, CO, 80302. VGW Luckyland also maintains an office at 442 Post Street, Suite 900, San Francisco, CA 94102. VGW Luckyland is registered to do business in the State of Arkansas.

17. Defendants VGW, Ltd. and VGW Holdings Pty LTD. ("VGW Holdings Pty") are foreign corporations headquartered in Perth, Australia. Defendants VGW, Ltd. and VGW Holdings Pty do business through their online Sweepstakes Casinos in all counties within Arkansas.

18. Defendants VGW Malta LTD ("VGW Malta"), VGW Malta Holding Limited ("VGW Malta Holding"), and VGW Games Limited ("VGW Games") are limited companies incorporated under Maltese law, with their principal places of business in Birkirkara, Malta. VGW Malta is registered to do business in the State of Arkansas. Upon information and belief, VGW Malta operates the platform Chumba Casino.

19. Defendant VGW GP Limited ("VGW GP") is a limited company incorporated under Maltese law, with its principal place of business in Birkirkara, Malta. VGW GP is registered to do business in the State of Arkansas, and upon information and belief, operates the platform Global Poker.

20. Defendant Beels Limited is a limited company incorporated under Maltese law, with its principal place of business in Birkirkara, Malta. Upon information and belief, Beels Limited operates the platform LuckyLand Casino.

21. Each and every Defendant played or plays a role in furthering Defendants' joint enterprise with the common goal of facilitating and promoting illegal gambling by Arkansas citizens at Defendants' Sweepstakes Casinos.

III. JURISDICTION AND VENUE

22. The causes of action in this Complaint stem from Defendants' marketing and operation of Sweepstakes Casinos in Arkansas.

23. This Court has jurisdiction over this matter under Ark. Code Ann. § 4-88-104, Ark. Code Ann. § 16-13-201, and the common law of the State of Arkansas.

24. This Court has personal jurisdiction over Defendants under Ark. Code Ann. § 4-88-113(d). Persons subject to joint and several liability under subsection (d)(1) are deemed to have purposefully availed themselves of conducting activities in Arkansas sufficient to establish personal jurisdiction. *Id.* § 4-88-113(d)(3).

25. This Court also has specific personal jurisdiction over VGW pursuant to Arkansas's long-arm jurisdiction provisions. At all times relevant to this Action, Defendants purposefully availed themselves of the privilege of conducting business in Arkansas by marketing their Sweepstakes Casinos to Arkansas residents, accepting payments from Arkansas consumers, facilitating casino-style gambling by Arkansas consumers, processing cash redemptions for those consumers, and deriving substantial revenue from Arkansas-based activity.

26. Defendants' internal records demonstrate the substantial scope of their business in Arkansas [redacted]

27. During that same timeframe, [redacted]

[redacted]

[redacted]

27. [redacted] These efforts were designed to attract new users, increase engagement, and drive purchases on Defendants' platforms, further demonstrating that Defendants deliberately targeted Arkansas consumers as part of their business model.

28. Between July 2025 and June 2026, Defendants reported approximately $66 million in taxable sales to the State of Arkansas. Defendants paid approximately $6 million in sales and use tax during this time period. Upon suspicion and belief, Defendants operated in Arkansas in 2022, 2023, 2024, and the first six months of 2025, but did not pay the State of Arkansas any taxes.

29. All of these activities are aimed at Arkansas, and these activities create a substantial connection with Arkansas sufficient to make the exercise of personal jurisdiction over Defendants reasonable for the courts of the State of Arkansas.

30. Venue is proper in White County under Ark. Code Ann. §§ 4-88-104 and 4-88-112 because the Defendants transact business in this county.

[redacted]

IV. FACTUAL ALLEGATIONS

A. Arkansas Law Prohibits Unlicensed Gambling.

31. Arkansas has long prohibited unauthorized gambling. Specifically, state law prohibits keeping, conducting, or operating a gambling house or other place where gambling is carried on, as well as setting up, keeping, or exhibiting a gambling device. Ark. Code Ann. § 5-66-103. Other provisions prohibit wagering money, anything of value, or any representative of a thing of value on prohibited gaming devices, specified card games, and other games of hazard or skill. Ark. Code Ann. §§ 5-66-106, 112, 113.

32. These laws extend broadly to gambling devices designed for games of chance or at which money or property may be won or lost, including devices "of any other description although not named" in the statute and "regardless of the name or denomination" given to them. Ark. Code Ann. § 5-66-104. Consistent with that breadth, the General Assembly has directed courts to construe the State's gambling laws liberally "with a view of preventing persons from evading the penalty of the law by changing of the name or the invention of new names or devices" used for gaming, and to construe general descriptions to include games and devices not specifically named. Ark. Code Ann. § 5-66-101(a).

33. The principal exception to Arkansas's general prohibition on gambling is Amendment 100, which permits casino gaming only by licensed operators subject to the regulation of the Arkansas Racing Commission. Ark. Const. amend. 100.

34. Amendment 100 is broad by design. It defines casino gaming to include games played with cards, dice, equipment, or electronic devices or machines for money, property, credit, or any representative of value. Ark. Const. amend. 100.

35. In exchange for the privilege of offering casino gaming, licensed operators must comply with extensive regulatory requirements intended to protect the public. Those requirements

include criminal and financial background checks for owners and officers, detailed recordkeeping requirements and other internal-control measures, operating a physical brick-and-mortar location in the state, and compliance with responsible-gaming requirements. Ark. Admin. Code 006.06.5 et seq.

36. Defendants hold no Arkansas casino license and do not operate their online casinos pursuant to that regulated framework. Yet Defendants offer Arkansas consumers slot machines, blackjack, poker, and other casino games through which consumers may wager Sweeps Coins and win or lose something redeemable for money or other prizes.

37. Defendants did not merely operate outside Arkansas's gambling laws; they also operated outside Arkansas's tax framework for years. Upon reasonable belief, Defendants did not begin remitting Arkansas sales and use taxes until mid-2025, despite conducting substantial business in the State since the 2010s. Between July 2025 and June 2026, Defendants reported approximately $66 million in taxable sales and paid approximately $6 million in Arkansas taxes.

B. VGW's Business is Gambling Under Another Name.

1. Defendants recreated the casino experience online

38. Defendants call their products "social gaming," but nearly every aspect of their business bears the hallmarks of traditional gambling and casinos.

39. Most obviously, Defendants have chosen to market their products using the names of the very institutions and games associated with traditional gambling. Their flagship platforms include Chumba **Casino** and LuckyLand **Casino.**[7] Other products are direct nods to typical casino staples like LuckyLand **Slots** or Global **Poker**, including the use of a poker chip in the logo.[8]





[7] VGW, *VGW Celebrates Launch of LuckyLand Casino* (June 12, 2017), https://www.vgw.co/latest-news/vgw-celebrates-launch-of-luckyland-casino/ (last visited Oct. 22, 2026).

[8] Global Poker, *Blackjack Online*, https://globalpoker.com/casino-games/table-games/blackjack-online (Video at :01) (last visited Oct. 27, 2026).

40. Defendants do not merely borrow casino terminology; they recreate the casino experience. Their websites offer, among other games, slot machines, blackjack, poker, and roulette—games Arkansas ***explicitly*** classifies as gambling games. 23 CAR § 358-102(25). These games are presented with the same visual and auditory flair of brick-and-mortar casinos: bright lights, flashing graphics, jackpot counters, spinning reels, and sounds on winning plays.







41. The only difference? What consumers use as gambling currency. In brick-and-mortar casinos, consumers exchange money for chips. Defendants do not use "chips." Instead, they offer two ways to play their casino games: Gold Coins or Sweeps Coins.[9] The gameplay may look similar, but the stakes are fundamentally different.

2. *How VGW's dual-currency system works*

42. Gold Coins are the currency Defendants sell to consumers. Gold Coins are used for play-for-fun gaming, meaning consumers can wager Gold Coins and win additional Gold Coins through gameplay, but those winnings cannot be redeemed for cash, prizes, or anything else of real-world value.[10]

43. Sweeps Coins are different. Unlike Gold Coins, Sweeps Coins are used for "sweepstakes" gameplay, where they can be wagered and won for the opportunity to receive something of real-world value like money or gift cards, generally at a rate of one U.S. Dollar for each Sweeps Coin.[11]

44. Consumers cannot buy Sweeps Coins independently. Instead, Sweeps Coins are usually given to consumers for "free" with the purchase of Gold Coins.[12]

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[9] Chumba Casino, *What's the Difference Between Gold and Sweeps Coins?*, Chumba Casino Help Ctr., https://help.chumbacasino.com/article/CHU-What-s-the-difference-between-Gold-Coins-and-Sweeps-Coins (last visited Oct. 28, 2026).

[10] *See e.g.,* Chumba Casino, *Terms and Conditions*, cls. 1, 6.10, Version 23.3 (Apr. 7, 2026), https://www.vgw.co/wp-content/uploads/2026/05/260407-POL-CHU-TCs-23.3.pdf (last visited Nov. 3, 2026).

[11] Luckyland Slots, *Sweeps Rules*, cls. 4.1–4.4, 6.3–6.5, Version 29.0 (Mar. 18, 2026), https://www.vgw.co/wp-content/uploads/2026/05/260318-POL-LLS-Sweeps-Rules-29.0.pdf (last visited Nov. 3, 2026).

[12] Chumba Casino, *Terms and Conditions*, cls. 1, def. "Sweeps Coin," Version 23.3 (Apr. 7, 2026), https://www.vgw.co/wp-content/uploads/2026/05/260407-POL-CHU-TCs-23.3.pdf (last visited Nov. 3, 2026); *see generally* chumbacasino.com, globalpoker.com, and luckylandcasino.com.

45. The amount of Sweeps Coins a user receives correlates to the amount of Gold Coins purchased. As shown in the image below, a consumer purchasing $20 of "Gold Coins" receives 20.50 Sweeps Coins as a bonus. And a purchase of $100 of Gold Coins nets the consumer 104 Sweeps Coins for "free."[13] The more money consumers pay Defendants, the more "free" gambling currency they receive.



46. In contrast, a $20 purchase yields approximately 5 million Gold Coins, enough for many rounds of Gold Coin gameplay.

[13] BestOdds, *Chumba Casino Review*, https://www.bestodds.com/sweepstakes/chumba (last visited Oct. 27, 2026).

47. Consumers may request redemption of won Sweeps Coins through Defendants' platforms, after which Defendants transfer money to the consumer through electronic payment methods. [redacted]

48. To sustain gameplay, Defendants do not permit immediate redemption of all Sweeps Coin winnings. Chumba Casino requires consumers to accumulate at least 100 redeemable Sweeps Coins before requesting a cash redemption, while other VGW platforms require at least 50 redeemable Sweeps Coins.[15]

49. [redacted]

[redacted]

[15] Chumba Casino, *Sweeps Rules* (Version 8.0, Dec. 15, 2023), https://www.chumbacasino.com/documents/231215-POL-CHU-Sweeps-Rules-8.0.pdf; Global Poker, *Sweeps Rules* (Version 25.1, Sept. 16, 2026), https://media.globalpoker.com/ vgwholdings89e8-vgw-prod-817c/media/260916_POL_POK_Sweeps_Rules_25-1.pdf.

[redacted]

3. Gold Coin purchases are how consumers primarily receive Sweeps Coins

51. Defendants offer ways consumers can obtain Sweeps Coins without a purchase, including login bonuses, promotional giveaways, and Alternative Methods of Entry ("AMOE").[19]

52. But Defendants place numerous, burdensome steps between consumers and Sweeps Coins when no purchase is involved. For example, under Chumba Casino's 2023 rules, a consumer had to generate a unique request code, handwrite specified information on a 4-by-6-inch card, place each request in a separately stamped envelope, and mail it according to Defendants' instructions—for five Sweeps Coins. If one step was incorrect, the consumer received nothing.[20]

53. Defendants' newer online process similarly requires multiple steps for the same five Sweeps Coins. Global Poker requires consumers to complete verification measures, obtain unique request language, reproduce it by hand on a 4-by-6-inch card, photograph and upload the card, and, in some instances, complete an additional selfie verification.[21]

54. No comparable process stands between a paying consumer and additional Sweeps Coins. Consumers can select a qualifying Gold Coin package, complete the purchase electronically, and receive the accompanying Sweeps Coins instantly.[22]

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[19] *See, e.g.,* LuckyLand Casino, *Sweeps Rules*, cl. 3.2(b)–(d), Version 4.1 (Apr. 24, 2026), https://www.vgw.co/wp-content/uploads/2026/05/260424-POL-LLC-Sweeps-Rules-4.1.pdf, (last visited Nov. 3, 2026).

[20] Chumba Casino, *Sweepstakes Rules* (archived Feb. 10, 2023), Internet Archive Wayback Machine, https://web.archive.org/web/20230210193314/https://www.chumbacasino.com/sweeps-rules (last visited Oct. 27, 2026).

[21] *Promotional Sweepstakes Rules*, Global Poker, https://media.globalpoker.com/vgwholdings89e8-vgw-prod-817c/media/261030-POL-POK-Sweeps-Rules-26-0.pdf

[22] *Sweepstakes Rules*, Chumba Casino, https://www.chumbacasino.com/sweeps-rules. (last visited Nov. 3, 2026)

55. The results reflect that reality. [redacted]

[redacted]

But those methods are the exception, not the rule, and they do not provide consumers the same ***immediate*** access to Sweeps Coins that purchasing Gold Coins does.

C. Defendants Modeled Their Business on Internet Sweepstakes Cafes to Evade Gambling Restrictions

56. Defendants built their online casino business around a simple premise: consumers can pay money, play casino games, and win cash, so long as the chips (or other gambling currency) are packaged with the purchase of a different product. That premise is not new. Defendants borrowed it from Internet sweepstakes cafés who used essentially the same device decades earlier.

57. Internet sweepstakes cafés sold consumers nominal products, such as Internet access or telephone minutes, and provided supposedly "free" sweepstakes credits with the purchase. Consumers could then use those credits to play slot machines and other casino-style games for the chance to win cash. The cafés maintained that the extra step insulated any gambling activity since consumers only paid for internet time or another nominal product and merely received the gambling credits for free.

58. Courts repeatedly rejected that distinction, noting the additional product did not change the underlying transaction.[24] Where consumers paid money, received sweepstakes entries,

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[redacted]

[24] *See, e.g.*, *Lucky Tunes #3 LLC v. Smith*, 2019 WL 13436322 (E.D. Tex. Nov. 18, 2019); *Texas v. Ysleta Del Sur Pueblo*, 2015 WL 1003879 (W.D. Tex. Mar. 6, 2015); *State v. Fellows*, 471 S.W.3d 555 (Tex. 2015); *U.S. v. Davis*, 690 F.3d 330 (5th Cir. 2012); *Moore v. Mississippi Gaming Comm'n*, 64 So.3d 537 (Miss. 2011); *Barber v. Jefferson, County Racing Ass'n., Inc.*, 960 So.2d 599 (Ala. 2006); *Jester v. State*, 64 S.W.3d 553 (Tex. 2001); *Midwestern Enterprises, Inc. v. Stenehjem*, 625 N.W.2d 234 (N. Dakota 2001); *Mississippi*

and used those entries to play casino-style games for cash, courts examined the substance of the arrangement rather than the labels attached to it. Arkansas has likewise rejected attempts to avoid its gambling laws through creative labels. In *Pre-Paid Solutions v. City of Little Rock*, 343 Ark. 317, 34 S.W.3d 360 (2001), the Arkansas Supreme Court held that a telephone-card machine offering customers the opportunity to win cash prizes was an unlawful gambling device notwithstanding the availability of free plays. The same principle applies here.

59. Defendants were intimately familiar with that model. In connection with VGW's 2016 effort to raise capital, an industry report included in its prospectus expressly identified the "internet sweepstakes café business model"[25] as a successful land-based model and concluded that it "may be equally applicable as a business model" for Internet Sweepstakes Gaming.[26] The report pointed to thousands of Internet sweepstakes cafés and billions of dollars in turnover as evidence of a "significant opportunity" for the same type of gaming online, and observed that, "despite significant prohibition," the United States remained the largest gaming market in the world.[27]

60. The prospectus was prepared by H2 **Gambling** Capital, which VGW described as a leading authority on the global **gambling industry**.[28] The repeated discussion of gambling throughout the prospectus further confirms that VGW viewed its products as participating in that market and understood the legal restrictions associated with it.

Gaming Comm'n. v. Six Electronic Video Gambling Devices, 792 So.2d 321 (Miss. Ct. App. 2001).

[25] Synergy Plus Ltd., *Prospectus*, p. 95 (Jan. 4, 2016) https://announcements.asx.com.au/asxpdf/20160104/pdf/4345wkvqbww4kk.pdf.

[26] *Id.* at p. 97.

[27] *Id.* at p. 69.

[28] *Id.* at p. 68.

61. And VGW was explicit about the opportunity it saw. Its prospectus described the combination of social-casino gaming and cash-prize gaming using sweepstakes credits as a "core part"[29] of its business model and explained that sweepstakes gameplay could provide a cash-prize gaming experience in markets "where online gambling may be prohibited."[30] VGW also described the largely unrealized United States market for consumers seeking an online cash-prize gaming experience as a significant growth opportunity.[31]

62. Defendants built a business by bringing the Internet sweepstakes model online and repackaging it as social gaming. That strategy was lucrative. By 2024, VGW reportedly generated $2.8 billion in annual revenue from its sweepstakes-casino operations, and VGW's CEO Lawrence Escalante had become the youngest billionaire in Australia's history.

D. Sweeps Coins, Not Gold Coins, Motivate Consumer Purchases

63. Defendants maintain that consumers purchase Gold Coins because they value play-for-fun gaming. But there is an obvious problem with that explanation: consumers can play Defendants' Gold Coins for free, without ever making a purchase.

64. After registering their account, consumers receive an allocation of Gold Coins to use on games.[32] They can also receive Gold Coins through daily logins and other promotions.[33]

65. More to the point: if a consumer exhausts their free coins, they can immediately

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[29] *Id.* at pp. 13, 62.

[30] *Id.* at p. 60.

[31] *Id.* at pp. 68, 85–89.

[32] *Purchasing gold coins on Chumba Casino*, https://www.chumbacasino.com/getting-started/purchase-gold-coins (last visited Oct. 28, 2026).

[33] *Sweepstakes Rules*, Chumba Casino, https://www.chumbacasino.com/sweeps-rules. (last visited Nov. 3, 2026)

obtain more Gold Coins ***for free***.[34] This replenishment option is ***always*** available, without a waiting period or limit.[35] In fact, if a consumer logs in and has less than 12,500 Gold Coins, they are automatically "topped up" with more Gold Coins.[36]

66. Gold Coins do not expire, allowing consumers to accumulate and retain substantial balances indefinitely. Taken together with Defendants' replenishment features, this means consumers can continue obtaining and using Gold Coins without purchasing additional packages.

67. [redacted]

68. Despite making Gold Coins available without charge, Defendants actively encourage consumers to purchase additional Gold Coin packages. Chumba Casino tells consumers: "Any time you run low on Gold Coins you can easily purchase more in the Store. There are plenty of purchase offers available to suit every pocket."[39]

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[34] Chumba Casino, VGW, https://www.vgw.co/chumba-casino/ (last visited Nov. 3, 2026); *Can I Play for Free?*, Chumba Casino Help Center, https://help.chumbacasino.com/article/CHU-Can-I-play-for-free (last visited Nov. 3, 2026).

[35] *Can I Play for Free?*, Chumba Casino Help Center, https://help.chumbacasino.com/article/CHU-Can-I-play-for-free (last visited Nov. 3, 2026).

[36] *Id.*

[redacted]

[38] *See also Global Poker, What Are Gold Coins?,* Global Poker, https://globalpoker.com/what-are-gold-coins (last visited Oct. 25, 2026) (Noting more than half of players do not make Gold Coin purchases).

[39] Chumba Casino, *Purchasing Gold Coins*, https://www.chumbacasino.com/getting-started/purchase-gold-coins (last visited Oct. 28, 2026).

69. That raises the question: why do roughly one-fourth of consumers pay for Gold Coin packages? [redacted].

70. Defendants' rewards and loyalty programs recognize that Gold Coins serve purposes beyond gameplay. For example, LuckyLand Slots offered a "Diamond Duck" VIP program through which consumers advanced through status tiers based on platform activity and Gold Coin usage.[41] Higher tiers unlocked new benefits and rewards, including Sweeps Coins, and the more Gold Coins consumers accumulated and used, the more valuable those benefits became.[42]

71. Through these programs, consumers were encouraged to maintain hundreds of thousands, and in some cases millions, of Gold Coins in pursuit of higher VIP status and associated rewards. Those rewards included exclusive promotions, premium offers, discounts on future purchases, and additional opportunities to obtain Sweeps Coins. As a result, consumers had incentives to purchase Gold Coin packages even when they already possessed substantial Gold Coin balances—indeed, more Gold Coins than they could realistically use for gameplay alone.

E. Legal and Safety Claims are Central to Defendants' Marketing.

72. Defendants have made legality and safety a feature of their marketing. The

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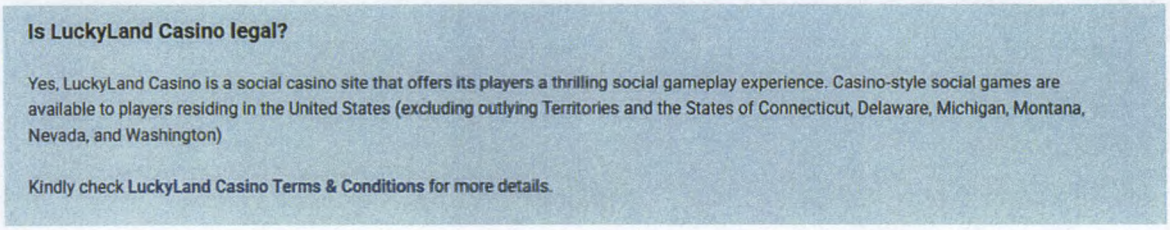
[redacted]

[41] *LuckyLand Slots Diamond Duck VIP Guide*, SweepsGrail, https://sweepsgrail.com/guides/luckyland-diamond-duck-vip-guide/ (last visited Nov. 3, 2026).

[42] *Id.*

LuckyLand Slots homepage told consumers: "Whatever mode of play you choose, you can trust LuckyLand is a safe and secure place to play the free slot games you love . . . **Rest assured that playing with us is 100% safe and 100% legal.**"[43]

73. The 100% legal message was not confined to Defendants' advertising. LuckyLand Casino's Help Center answered "Is LuckyLand Casino Legal?" with "Yes" and characterized the platform as a "social casino site."[44]



74. Global Poker even placed legality front and center on its social media handles.[45]



[43] LuckyLand Slots, *LuckyLand Slots* (archived Jan. 30, 2025), https://web.archive.org/web/20250130174941/https://www.luckylandslots.com/ (last visited Oct. 22, 2026).

[44] *Is LuckyLand Casino Legal?*, LuckyLand Casino Help Center, https://help.luckylandcasino.com/article/LLC-Is-LuckyLand-Casino-legal (last visited Oct. 22, 2026); *see also Is Global Poker Legal?*, Global Poker Help Center, *https://help.globalpoker.com/article/Is-Global-Poker-legal* (last visited Oct. 27, 2026).

[45] Global Poker (@official_glp), X, https://x.com/official_glp (last visited Oct. 27, 2026).

75. Defendants also market their platforms as free, social, and promotional in nature. Consumers are encouraged to play free social casino games and free social poker, and enjoy a platform that is entirely free to sign up and play. Defendants also stress that no purchase is necessary and promote opportunities to participate in Sweepstakes promotions using Sweeps Coins. The consistent message is that consumers are not paying to gamble but instead engaging in a free promotional program through which redeemable Sweeps Coins are merely awarded.

76. Through these representations, Defendants portray their products as fundamentally different from traditional gambling.

77. Consumers are therefore invited not merely to play Defendants' games, but to trust Defendants' assurances that those games fall outside the gambling laws that would otherwise apply.

F. Defendants' casinos cause real-world harm, including to underage users.

78. Defendants characterize their products as social gaming and repeatedly advertise them as free and legal. But participation in Defendants' casinos involves real financial risk. Consumers spend real money to obtain Gold Coin packages that include Sweeps Coins, the currency used to wager on slot machines, blackjack, poker, and other casino-style games for cash and prizes.

79. Defendants have designed their system to make additional gambling currency available in a matter of seconds. A consumer can purchase a Gold Coin package electronically and receive the accompanying Sweeps Coins immediately.

80. And the purchase need not be tied to consumers' actual available funds. Defendants permit consumers to purchase Gold Coin packages using credit cards and other electronic payment

methods.[46] As a result, consumers can obtain additional Sweeps Coins and continue gambling with money they don't have. The consequences of that arrangement are significant. A consumer may lose the accompanying Sweeps Coins through gameplay while remaining responsible for repaying the underlying debt, together with any applicable interest and fees.

81. Near-continuous access to these casinos only compounds this problem. Casino-style gambling is available on mobile phones, tablets, and personal computers without the need to visit a physical casino or engage in any in-person transaction.[47] Additional Sweeps Coins can be obtained at any time and from any location VGW operates.

82. Unlike Gold Coins, Sweeps Coins automatically expire after periods of inactivity. For example, Sweeps Coins at Chumba Casino automatically expire 60 days after a participant's last login.[48] As a result, consumers who obtain Sweeps Coins through purchases of Gold Coin packages may forfeit those Sweeps Coins entirely if they do not maintain activity on the platform.

83. This forfeiture risk is not incidental—it is an incentive. By conditioning the retention of Sweeps Coins on continued activity, Defendants create pressure for consumers to keep returning to their casinos rather than risk losing accumulated gambling currency.

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[46] *See e.g.*, *Purchase Gold Coins*, Chumba Casino, https://www.chumbacasino.com/getting-started/purchase-gold-coins (last visited Oct. 21, 2026); What Are Gold Coins?, Global Poker, https://globalpoker.com/what-are-gold-coins (last visited Oct. 21, 2026).

[47] Forrest, R., Doan, N., MacDonald-Spracklin, R., Pugliese, M., Turner, N.E. & Myran, D.T., *Emergency Department Visits for Gambling Disorders After the Legalization of Single-Event Sports Betting and Rapid Expansion of Online Gambling*, ___ Am. J. Preventive Med. ___, No. 108551 (Sept. 16, 2026), https://pubmed.ncbi.nlm.nih.gov/42747355/.

[48] *Sweepstakes Rules*, Chumba Casino, https://www.chumbacasino.com/sweeps-rules. (last visited Nov. 3, 2026); Matthew Bain, *Chumba Casino, Other VGW Sites Raise Age Limit From 18 to 21*, Sweepsy (Feb. 14, 2025), https://www.sweepsy.com/news/chumba-casino-luckyland-slots-global-poker-raise-age-limit-from-18-to-21/ (last visited Nov. 3, 2026).

84. The rapid growth of online gambling platforms has coincided with an increase in gambling-related harms among individuals under the age of 18.[49] Unlike traditional brick-and-mortar casinos, which can physically restrict access to underage individuals, online gambling websites such as Defendants' Sweepstakes Casinos are readily accessible from a smartphone, tablet, or computer. This ease of access has contributed to increasing participation in gambling activities by minors and a corresponding rise in youth gambling addiction.[50]

85. Arkansas restricts regulated casino wagering accounts to individuals 21 years of age or older. Ark. Const. amend. 100, § 3(d); 23 CAR § 358-425. For years, Defendants expressly permitted individuals as young as 18 years old to open accounts, purchase Gold Coin packages, receive Sweeps Coins, and participate in Defendants' casino-style gambling products.[51] Defendants did not comply with this 21+ age restriction in Arkansas until February 2025.[52]

86. Young adults are particularly vulnerable to gambling-related harm. Researchers have identified individuals in their late teens and early twenties as among the populations at greatest risk for developing gambling problems and gambling disorder.[53] Recent studies have reported that gambling-disorder diagnoses have increased most sharply among young adults

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[49] Veselka et al., *Factors Associated With Social Casino Gaming Among Adolescents Across Game Types*, 18 BMC Public Health 1167 (2018).

[50] *Id.*

[51] Matthew Bain, *Chumba Casino, Other VGW Sites Raise Age Limit From 18 to 21*, Sweepsy (Feb. 14, 2025), https://www.sweepsy.com/news/chumba-casino-luckyland-slots-global-poker-raise-age-limit-from-18-to-21/ (last visited Nov. 3, 2026).

[52] *See, e.g.*, Global Poker, *What Is the Minimum Age to Play on Global Poker?*, https://help.globalpoker.com/article/What-is-the-minimum-age-to-play-on-Global-Poker (last visited Oct. 27, 2026).

[53] Ning Hing, Alex Russell, Barry Tolchard & Lia Nower, *Risk Factors for Gambling Problems: An Analysis by Gender*, 32 J. Gambling Stud. 511 (2016), https://pmc.ncbi.nlm.nih.gov/articles/PMC4875054/.

following the expansion of online and sports betting.[54] Young adult gamblers have also been found to experience elevated rates of mental-health and substance-use problems.[55]

[redacted]

88. Defendants' failure to include appropriate age restrictions places younger consumers at greater risk. Compared to older adults, young consumers often have less established credit, fewer financial resources, less experience managing debt, and greater susceptibility to impulsive risk-taking behavior associated with gambling.[58]

89. [redacted]

90. [redacted]

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[54] K. Bartelt et al., *Gambling Disorder Diagnoses Have Risen More Than 60% in States That Legalized Sports Betting*, Epic Research, https://epicresearch.org/articles/gambling-disorder-diagnoses-have-risen-more-than-60-in-states-that-legalized-sports-betting (last visited Oct. 19, 2026).

[55] Elisabeth Sohn, *How Gambling Affects the Brain and Who Is Most Vulnerable to Addiction*, Monitor on Psych., July 1, 2023, https://www.apa.org/monitor/2023/07/how-gambling-affects-the-brain.

[redacted]

[58] *See generally* supra notes 47–55.

[redacted]

[redacted]

91. The medical community no longer treats problem gambling as a lack of self-control. In 2013, the American Psychiatric Association reclassified gambling disorder as an addiction, making it the first—and to date, only—non-substance-related addiction recognized in psychiatry's primary diagnostic framework.

92. Like substance-abuse addictions, gambling addiction often involves an escalating tolerance. That means that over time, individuals may place larger bets, take greater risks, or gamble more frequently in pursuit of the same excitement or "high."

93. These risks associated with gambling are not merely financial. In addition to debt, consumers who develop gambling problems frequently experience depression, anxiety, psychological distress, and damaged personal relationships.[61] Gambling-related harms may also affect family members through relationship conflict, emotional hardship, housing instability, and other adverse consequences.[62]

94. In severe cases, gambling-related harms can become life-threatening. Researchers have identified indebtedness and shame as principal pathways through which gambling contributes to suicidal ideation and suicide.[63] Studies have consistently found that individuals suffering from gambling disorder face substantially elevated rates of suicidal thoughts and suicide attempts

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[redacted]

[61] Forrest et al., *Emergency Department Visits for Gambling Disorders After the Legalization of Single-Event Sports Betting and Rapid Expansion of Online Gambling*, supra note 48.

[62] *Id.*

[63] Virve Marionneau & Jaakko Nikkinen, *Gambling-Related Suicides and Suicidality: A Systematic Review of Qualitative Evidence*, 13 Frontiers Psychiatry 980303 (2022), https://pubmed.ncbi.nlm.nih.gov/36387006/.

compared to the general population.[64]

95. And as gambling opportunities have expanded, healthcare providers have also reported significant increases in emergency treatment related to gambling disorders, including presentations involving depression, suicidality, substance-use disorders, and other serious mental-health conditions.[65]

96. These harms are not theoretical. Approximately 2% of Arkansans are estimated to experience problem-gambling behavior.[66] The Arkansas Problem Gambling Helpline answered more than 4,500 calls during the first six months of 2026, a 22.5% increase from the same period the year before.[67]

G. Defendants Know Their Products Create Gambling-Related Risks.

97. Defendants may disguise their products as social gaming, but they cannot hide the real risks those products create. On each of their websites, Defendants provide gambling addiction resources, maintain responsible gaming policies, and educate consumers about the warnings and dangers of gambling addiction.[68] They also disclose that their casino-style games are designed with

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[64] *Id.*

[65] Forrest et al., *Emergency Department Visits for Gambling Disorders After the Legalization of Single-Event Sports Betting and Rapid Expansion of Online Gambling*, supra note 48.

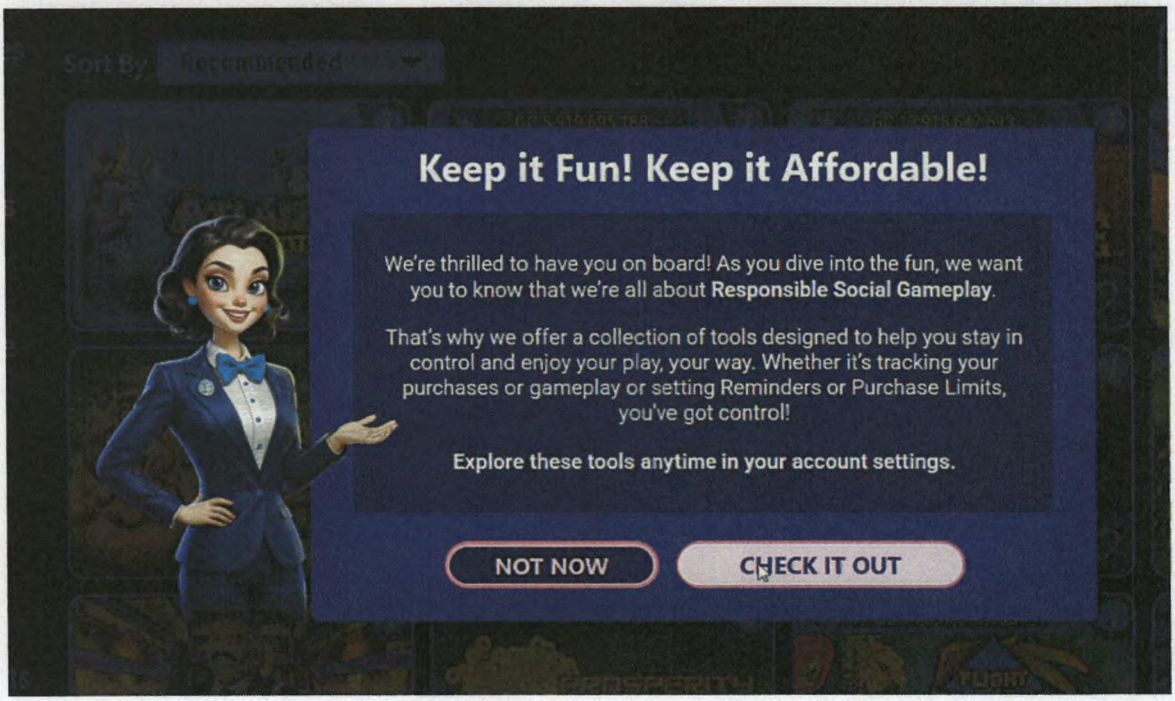
[66] *Silent Addiction: How Arkansas Is Battling Gambling Addiction in the State*, Lake Point Recovery & Wellness, https://lakepointrecovery.org/news/silent-addiction-how-arkansas-is-battling-gambling-addiction-in-the-state/ (last visited Oct. 28, 2026).

[67] 5NEWS, *Facebook* (2006), https://www.facebook.com/watch/?v=1592437739175809, (last visited Nov. 3, 2026).

[68] Chumba Casino, *Responsible Social Gameplay Policy* (Version 4.0), https://media.www.chumbacasino.com/vgwholdings89e8-vgw-prod-817c/media/250710-POL-CHU-RSG-4-0.pdf (last visited Oct. 28, 2026); LuckyLand Casino, *Responsible Social Gameplay Policy* (Version 1.0), https://media.luckylandcasino.com/vgwholdings89e8-vgw-prod-817c/media/251002-POL-LLC-Responsible-Social-Gameplay-1-0.pdf (last visited Oct. 28, 2026). Global Poker, *Responsible Social*

a mathematical advantage favoring the operator and that over time player losses are expected to exceed player winnings.[69]

98. In fact, on at least one platform, users are presented with a responsible gaming screen immediately after registering. This screen stresses the importance of staying in control, and previews certain tools like purchase limits Defendants designed to help users manage their spending.[70]

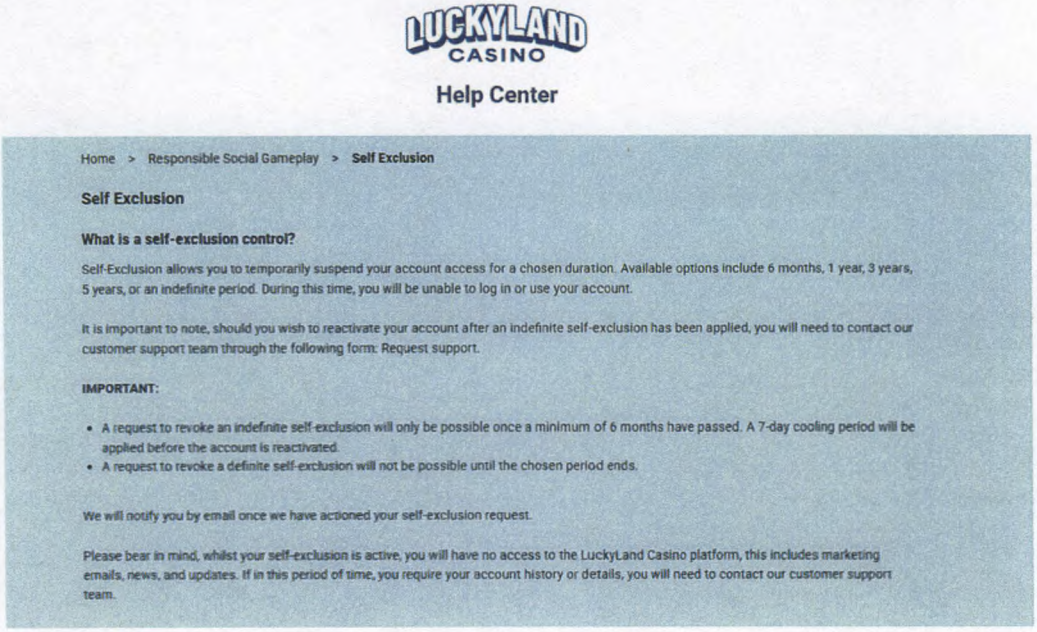


Gameplay Policy (Version 5.0), https://media.globalpoker.com/vgwholdings89e8-vgw-prod-817c/media/251124-POL-RSG-POK-5-0.pdf (last visited Oct. 28, 2026).

[69] *Id.*

[70] Play.luckylandcasino/lobby (immediately upon registering) (last visited Oct. 26, 2026).

99. Defendants offer other tools commonly associated with gambling operators, including account restrictions, cooling-off periods, self-exclusion, and other mechanisms whose entire purpose is to limit gambling activity[71]



100. The reason Defendants maintain these safeguards is obvious: Defendants understand that participation in their products can lead to excessive gambling, loss of control, financial distress, and other gambling-related harms.

101. Certain mechanisms, like Play Limits only apply to Sweeps Coins; they do not apply to Gold Coins, even though Defendants claim consumers primarily play with Gold Coins.[72] This reflects the reality of the situation: Sweeps Coins, unlike Gold Coins, expose consumers to

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[71] LuckyLand Casino, *Responsible Social Gameplay Policy* (Version 1.0), https://media.luckylandcasino.com/ vgwholdings89e8-vgw-prod-817c/media/251002-POL-LLC-Responsible-Social-Gameplay-1-0.pdf (last visited Oct. 28, 2026).

[72] Chumba Casino, *Responsible Social Gameplay Policy*, p. 3 (July 10, 2025), https://media.www.chumbacasino.com/vgwholdings89e8-vgw-prod-817c/media/250710-POL-CHU-RSG-4-0.pdf. (last visited Nov. 3, 2026).

gambling-related harms.

102. If Defendants truly believed their products were not gambling or posed no gambling-related risks, there would be no reason to offer gambling-addiction resources, self-exclusion tools, cooling-off periods, and spending controls.

103. These measures are not designed to address the risks of ordinary social gaming. Rather, Defendants provide these measures because they understand that consumers can lose control, incur substantial losses, and suffer the same harms long associated with traditional gambling.

104. Defendants are not operating in a regulatory vacuum. They are well aware that regulators and lawmakers have repeatedly questioned the legality of sweepstakes casino operations. [redacted]

V. VIOLATIONS OF LAW

ADTPA Violations

105. The State of Arkansas hereby repeats and incorporates by reference all other allegations of this Complaint. Ark. R. Civ. P. 10(c).

106. The ADTPA sets forth the State's regulatory program prohibiting deceptive and unconscionable practices in business, commerce, or trade. Ark Code Ann. §§ 4-88-101, et seq. It is based on Section 5 of the Federal Trade Commission Act, which likewise prohibits unfair and deceptive business practices. 15 U.S.C. § 45(a)(1), Unfair methods of competition unlawful;

[redacted]

prevention by Commission.[74]

107. Defendants' online service platform constitutes the sale of services subject to the ADTPA. Ark. Code Ann. § 4-88-102(8). Furthermore, Defendants have engaged in "business, commerce, or trade" within the meaning of the ADTPA by selling and advertising their casino platforms and selling Gold Coin packages with accompanying Sweeps Coins.

108. The Attorney General may bring a civil action to prevent persons from engaging in the use or employment of prohibited practices and hold individuals and companies liable for past violations. Ark. Code Ann. § 4-88-113(a)(1).

109. A business practice violates the ADTPA if it is likely to mislead a reasonable consumer acting normally under the circumstances and is material to the transaction. A practice is material if it is likely to affect the consumer's conduct or decision with regard to the product or service at issue. Materiality is presumed if the practice involves the health, safety, or other significant area where a reasonable consumer would be concerned.

110. Unlike private plaintiffs, the Attorney General is not required to prove harm to sustain an ADTPA claim for civil penalties. Instead, if the practice is material, harm is presumed because consumers would have chosen differently but for the deceptive practice.

111. Likewise, the Attorney General does not have to prove reliance or actual deception. A business practice violates the ADTPA if it is likely to mislead a reasonable consumer.

112. Unless the specific provision of the ADTPA claim requires scienter, the Attorney General is not required to prove intent.

113. Any person (the definition of which includes a company) who violates the

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[74] *See* FEDERAL TRADE COMMISSION, FTC Policy Statement on Deception, appended to Cliffdale Assocs., Inc., 103 F.T.C. 110, 174 (1984) at pp. 1–6.

provisions of the ADTPA may be assessed a civil penalty of up to $10,000 per violation. Ark. Code Ann. § 4-88-113(a)(3). Depending on the circumstances, "violation" can mean per sale, per advertisement, per letter, per product, or other similar individual basis.

114. The State can also recover additional civil penalties of up to $10,000 for every violation of the Arkansas Deceptive Trade Practices Act committed against an elder person or person with a disability.

115. Finally, the State may seek restitution, declaratory and injunctive relief, and recover attorneys' fees and all expenses reasonably incurred in the investigation and prosecution of this action. Ark. Code Ann. §§ 4-88-113(a), (e).

ADTPA Count 1: Defendants knowingly made express false representations to consumers in violation of Ark. Code Ann. § 4-88-107(a)(1).

116. The State repeats and incorporates by reference every allegation contained in the preceding paragraphs as if fully set forth herein. Ark. R. Civ. P. 10(c).

117. Under the ADTPA, it is unlawful to knowingly make a false representation as to the characteristics, ingredients, uses, benefits, alterations, source, sponsorship, approval, or certification of goods or services. Ark. Code Ann. § 4-88-107(a)(1). Similarly, it is unlawful to make a false representation as to whether the goods are of a particular standard, quality, grade, or model. Ark. Code Ann. § 4-88-107(a)(1).

118. While doing business in Arkansas, Defendants have repeatedly represented to Arkansas consumers that their products were social casinos and were "100% safe and 100% legal."

119. Defendants also advertised that consumers could play their products "for free" and characterized their offerings as free social casino games, free social poker, and similar forms of entertainment.

120. Those representations were false. Defendants in fact operated an unlawful gambling

platform through which consumers paid real money for the opportunity to wager on games of chance and win cash prizes. No sweepstakes game could be played without a Sweeps Coin. [redacted].

121. Those knowingly false representations identified in paragraphs 73–76 above, as well as any other substantially similar statement about legality and safety, constitutes a violation of Ark. Code Ann. § 4-88-107(a)(1), subject to civil penalties.

122. Every named Defendant either directly violated this section of the ADTPA or otherwise knowingly facilitated, assisted, intermediated, or aided in some other way the operation or continuance of this alleged violation, and is therefore equally liable under Ark. Code Ann. § 4-88-107(a)(12).

ADTPA Count 2: Defendants engaged in unconscionable, false or deceptive acts or practices in business in violation of Ark. Code Ann. § 4-88-107(a)(10).

123. The State repeats and incorporates by reference every allegation contained in the preceding paragraphs as if fully set forth herein. Ark. R. Civ. P. 10(c).

124. The ADTPA prohibits unconscionable behavior in consumer transactions. Ark. Code Ann. § 4-88-107(a)(10).

125. The Arkansas Supreme Court has defined unconscionable as conduct that affronts the sense of justice, decency, or reasonableness, including conduct that violates public policy or another statute.[75]

126. A legal violation committed in the course of a consumer transaction is a *per se* violation of the ADTPA's unconscionability clause.

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[75] *Baptist Health v. Murphy*, 365 Ark. 115, 128 n.6, 226 S.W.3d 800, 811 n.6 (2006).

127. Defendants did not merely violate Arkansas's gambling laws. They built their entire business model around avoiding them. *See e.g.*, Ark. Const. amend. 100; Ark. Code Ann. § 5-66-101 et seq.

128. By disguising gambling as a sweepstakes promotion, Defendants accepted money from Arkansas consumers, facilitated casino-style wagering, and paid out cash prizes while operating outside Arkansas's licensing, regulatory, and consumer-protection framework, in violation of Ark. Code Ann. §§ 5-66-103 and 104.

129. Defendants also exposed Arkansas consumers to well-known gambling-related harms while avoiding safeguards that Arkansas requires of lawful casino operators, including licensing requirements, regulatory oversight, and age restrictions designed to protect younger consumers. Most notably, Defendants allowed 18, 19, and 20-year-old Arkansans to participate in casino-style gambling, despite Arkansas's mandatory minimum age of 21 for casino wagering. Ark. Const. amend. 100, § 3(d); 23 CAR § 358-425.

130. Through this conduct, Defendants chose profits over the protections established by Arkansas law for consumers and minors and violated Arkansas's gambling laws and regulations. *See e.g.*, Ark. Const. amend. 100; Ark. Code Ann. § 5-66-101 et seq; 23 CAR § 358-101 et seq.

131. Defendants therefore engaged in unconscionable, false, and deceptive acts or practices in violation of Ark. Code Ann. § 4-88-107(a)(10).

132. Every Defendant either directly violated this section of the ADTPA or otherwise facilitated, assisted, intermediated, or aided in some other way the operation or continuance of this alleged violation, and is therefore equally liable under Ark. Code Ann. § 4-88-107(a)(12).

ADTPA Count 3: Defendants utilized deception, fraud, or false pretenses during interactions with consumers in violation of Ark. Code Ann. § 4-88-108(a)(1).

133. The State repeats and incorporates by reference every allegation contained in the

preceding paragraphs as if fully set forth herein. Ark. R. Civ. P. 10(c).

134. Ark. Code Ann. 4-88-108(a)(1) prohibits the use of any deception, fraud, or false pretense during the sale or advertisement of any goods or services.

135. Defendants' entire business model is based on disguising gambling operations as social gaming. Specifically, Defendants used Gold Coins as a pretext to characterize the purchase of gambling currency as participation in a sweepstakes promotion. In doing so, Defendants obscured the true nature of the transaction: consumers paid money to obtain the currency used to gamble for cash prizes.

136. These false pretenses allowed Defendants to present casino-style gambling as a purportedly lawful sweepstakes promotion in violation of Ark. Code Ann. § 4-88-108(a)(1).

B. Common Law Claims: Unjust Enrichment

137. The State repeats and incorporates by reference every allegation contained in the preceding paragraphs as if fully set forth herein. Ark. R. Civ. P. 10(c).

138. The State brings this claim pursuant to its common-law and *parens patriae* authority to protect its quasi-soverign interests in the health and economic well-being of Arkansas residents and in preventing unlawful gambling in Arkansas, as well as the Attorney General's statutory authority to seek relief on behalf of the State of Arkansas and its citizens.

139. Defendants received substantial benefits in the form of money paid by Arkansas consumers through transactions conducted on Defendants' platforms.

140. [redacted].

141. Defendants accepted and retained those benefits through conduct that violated Arkansas gambling laws and the Arkansas Deceptive Trade Practices Act.

142. Arkansas law declares void contracts whose consideration includes gambling winnings or money or property lent to be wagered. Ark. Code Ann. § 16-118-103(b)(1).

143. The money Defendants obtained from Arkansas consumers was acquired through transactions that formed part of Defendants' unlawful gambling operation.

144. Because those transactions arose from unlawful gambling activity, permitting them to retain those ill-gotten gains would be unjust.

145. Additionally, upon information and belief, Defendants retained the benefits of doing business in Arkansas, including revenues generated from Arkansas consumers, while failing to remit Arkansas sales and use taxes to the State for years.

146. Permitting Defendants to retain the proceeds of their unlawful conduct would be inequitable and contrary to Arkansas public policy.

147. As a direct and proximate result of Defendants' conduct, the State and Arkansas consumers have suffered injury, and Defendants have been unjustly enriched.

148. Equity therefore requires restitution, disgorgement, and other appropriate relief to prevent Defendants from being unjustly enriched at the expense of Arkansas Consumers.

VI. JURY DEMAND

150. Attorney General Tim Griffin demands a trial by jury to determine whether Defendants violated the ADTPA and, if so, the number of violations.

VII. PRAYER FOR RELIEF

151. The State of Arkansas, *ex rel.* Tim Griffin, Attorney General, respectfully requests this Court:

a) Enter judgment in favor of the State and against Defendants on all claims asserted herein;

b) Declare that Defendants violated the laws identified in this Complaint;

c) Permanently enjoin Defendants, their officers, agents, employees, successors, and all persons acting in concert with them from engaging in the unlawful conduct alleged herein;

d) Pursuant to Ark. Code Ann. §§ 4-88-104 and 4-88-113, award consumer restitution, restoration of money or property obtained through unlawful practices, disgorgement, and all other equitable relief authorized by law;

e) Assess civil penalties pursuant to Ark. Code Ann. § 4-88-113(a)(3), including any additional penalties under Ark. Code Ann. § 4-88-202(a) for qualifying violations;

f) Issue an order, pursuant to Ark. Code Ann. § 4-88-113(e), requiring Defendants to pay the State's costs in this investigation and litigation, including, but not limited to, attorney's fees and costs;

g) Issue an order that Defendants pay pre-judgment and post-judgment interest at the highest legal rate as provided by law,

h) Find that the Defendants are jointly and severally liable, under Ark. Code Ann. § 4-88-113(d), for any civil penalties and monetary judgment awarded;

i) Awarding Plaintiff a writ of prejudgment attachment of Defendants' Sweepstakes Casinos;

j) For all other just and proper relief to which the State may be entitled.

Respectfully submitted,

DATED: November 4, 2026

TIM GRIFFIN
ATTORNEY GENERAL

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* *Pro hac vice* application forthcoming

IN THE CIRCUIT COURT OF WHITE COUNTY, ARKANSAS
CIVIL DIVISION

STATE OF ARKANSAS, *ex rel.*
TIM GRIFFIN, ATTORNEY GENERAL **PLAINTIFF**

v. **CASE NO.** 73CV-26-1743

VGW HOLDINGS U.S. INC,
VGW U.S. INC., VGW LUCKYLAND, INC.,
VGW HOLDINGS PTY LTD., VGW LTD.,
VGW MALTA LTD,
VGW MALTA HOLDING LIMITED,
VGW GAMES LIMITED, VGW GP LIMITED
BEELS LIMITED **DEFENDANTS**

EXHIBIT "A" Redacted

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CIVIL DIVISION

STATE OF ARKANSAS, *ex rel.*
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VGW MALTA HOLDING LIMITED,
VGW GAMES LIMITED, VGW GP LIMITED
BEELS LIMITED **DEFENDANTS**

EXHIBIT "B" Redacted

IN THE CIRCUIT COURT OF WHITE COUNTY, ARKANSAS
CIVIL DIVISION

STATE OF ARKANSAS, *ex rel.*
TIM GRIFFIN, ATTORNEY GENERAL **PLAINTIFF**

v. **CASE NO.** 73CV-26-1743

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VGW U.S. INC., VGW LUCKYLAND, INC.,
VGW HOLDINGS PTY LTD., VGW LTD.,
VGW MALTA LTD,
VGW MALTA HOLDING LIMITED,
VGW GAMES LIMITED, VGW GP LIMITED
BEELS LIMITED **DEFENDANTS**

EXHIBIT "C" Redacted
