

July 8, 2026

**Sent Via CERTIFIED MAIL, U.S. MAIL, AND EMAIL**

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Club Services, Inc.  
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Irvine, CA 92614

Club Services, Inc.  
Attn: Legal Department  
17877 Von Karman Avenue, Suite 300  
Irvine, CA 92614

[support@clubwptgold.com](mailto:support@clubwptgold.com)  
[members@theclubservices.com](mailto:members@theclubservices.com)

Re: **Cease and Desist – Club WPT Online Poker**

Dear Sir/Madam,

**YOU, CLUB SERVICES, INC., GRAND CRU CONCEPTS LTD, AND OPERATORS OF THE CLUB WPT ONLINE POKER PLATFORM (COLLECTIVELY “CLUB WPT”), ARE HEREBY DIRECTED TO IMMEDIATELY CEASE ALL GAMBLING OPERATIONS AND ACTIVITIES IN ARIZONA, WHETHER THROUGH THE CLUB WPT WEBSITE, MOBILE APPLICATION, OR OTHERWISE, AND REGARDLESS OF WHETHER THE CONDUCT IS LABELED A “SWEEPSTAKES.” THE OPERATION BY CLUB WPT OF ILLEGAL GAMBLING IN ARIZONA IS A FELONY CRIMINAL ENTERPRISE. YOU ARE FURTHER DIRECTED TO DESIST FROM ANY FUTURE ILLEGAL GAMBLING OPERATIONS OR ACTIVITIES OF ANY TYPE IN ARIZONA.**

With regard to its activities, ClubWPT lists that “[e]ligible territories include . . . U.S. States: . . . Arizona . . .” Those activities have now come to the attention of the Arizona Department of Gaming (the “Department”). Club WPT is enabling Arizona individuals under the age of twenty-one (21) to engage in pay-to-play online poker tournaments for prizes. This activity in Arizona qualifies as “gambling” as

defined in A.R.S. § 13-3301(6). To the extent that you are, in fact, operating, enabling, and/or promoting this activity in Arizona and engaging with participants located in Arizona, your conduct is illegal.

The Department recognizes your attempt to claim that your activity is legal by stating that no purchase is necessary to enter the tournaments. However, the availability of a "free" method of entry does not exempt the activity from Arizona's gambling prohibitions. With ClubWPT in Arizona, individuals under the age of twenty-one (21) appear able to create accounts, purchase Diamond, Super SATurdays, and VIP memberships for a fee, and only then participate in poker tournaments for prizes. This is gambling. The claim of "NO PURCHASE NECESSARY" is a subterfuge. In order to participate for free, players must find the correct terms of service on the website, locate the free-to-play section, and then follow the instructions which demand a "Mail-In Registration" with extensive requirements. This process amounts to players giving consideration and is intended to present enough of a roadblock to free participation that people simply opt to pay. There is nothing that prevents you from allowing players to participate for free in the same manner, to the same degree, and with the same effort as those who pay, except for your desire to force people to gamble and to make money from that gambling. To the extent that you have in the past accepted money payments and/or gambling wagers from people located in Arizona and intend to continue doing so in the future, you are directed to cease and desist from this activity immediately.

The Department further notes ClubWPT's claims that it "operates under applicable Sweepstakes Laws" and that it "is 100% legal online poker and operates within the sweepstakes rules where they are legal." These statements as to Arizona residents are fraudulent and misleading. The poker is not legal and the attempt to disguise your conduct as a "sweepstakes" fails. "Sweepstakes" is not a defined term under Arizona law, there are no "sweepstakes" laws or rules, and there is no exception from the illegal gambling statutes for conduct labeled "sweepstakes."

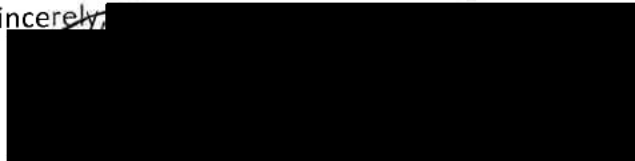
Online poker gambling as operated by you in Arizona is illegal. A.R.S. §§ 13-3301 *et seq.* This includes the business of promoting gambling, accepting bets or wagers, benefitting from gambling, or possessing gambling records. No exception listed in A.R.S. § 13-3302, including for social or regulated gambling under A.R.S. §§ 5-1301 *et seq.*, applies to you or your apparent activity. Your actions thus may amount to numerous statutory violations which include, but are not limited to, the following illegal felony conduct:

1. Promotion of Gambling (Felony) -- A.R.S. § 13-3303.
2. Illegal Control of an Enterprise (Felony) -- A.R.S. § 13-2312.
3. Money Laundering (Felony) -- A.R.S. § 13-2317.

The Department requires that you cease engaging in gambling operations and activities in Arizona and desist from doing so in the future. Failure to do so is further evidence of your ongoing knowing and willful violation of the law. It is not sufficient to simply say "VOID WHERE PROHIBITED BY LAW" or that "[e]ligibility to participate for cash and prizes is based on the State or Territory in which you reside." **IT IS YOUR RESPONSIBILITY TO IMMEDIATELY STOP PERSONS LOCATED IN ARIZONA FROM ALL ILLEGAL GAMBLING ACTIVITY.** Note that, among other things, you are subject to a potential award of restitution to those who lost money, and an action for forfeiture of all monies you acquired, as a result of your illegal conduct. See e.g. A.R.S. §§ 13-804 and 13-2314.

The statutes and criminal violations referenced in this letter are not exhaustive. This letter is intended only to place you on notice that the Department is aware of your conduct and to direct you to take immediate steps to comply with Arizona law. Future actions may include the filing of criminal charges or a civil action against you and/or your principals or employees.

Sincerely,



Douglas Jensen  
Chief Law Enforcement Officer  
Arizona Department of Gaming