



December 11, 2007

Submitted via email to regs.comments@federalreserve.gov

Jennifer J. Johnson
Secretary, Board of Governors of the Federal Reserve System
20th Street and Constitution Avenue, N.W.
Washington DC 20551

Re: Docket Number R-1298

Dear Ms. Johnson:

MoneyGram International, Inc. ("MoneyGram") appreciates the opportunity to provide comments on the proposed rules ("Rules") to implement provisions of the Unlawful Internet Gambling Enforcement Act ("Act").

MoneyGram's Business

MoneyGram (NYSE: MGI) is an international payment services company. MoneyGram operates in approximately 170 countries through a network of more than 138,000 agent locations.

A key segment of MoneyGram's business is money transfer. MoneyGram[®] Money Transfer is a person-to-person service. To conduct a money transfer, a consumer visits a MoneyGram agent, completes a send form, indicating, among other information, the name of the recipient of the money transfer, provides the cash to be transferred and pays the transfer fee. The recipient then visits a MoneyGram location, provides proper identification and receives the proceeds of the money transfer.¹

Unless a transaction is suspicious, MoneyGram agents are not directed to ask a money transfer sender or receiver to provide the reason for the money transfer. The mere fact of sending a money transfer for the purpose of illegal Internet gambling is unlikely to appear suspicious absent other factors such as a large dollar amount, structuring etc.

If a consumer wishes to send money to a business, *i.e.*, to pay a bill, the consumer utilizes MoneyGram's ExpressPayment[®] service. MoneyGram has contractual relationships with those businesses that accept ExpressPayment transactions and refers to them as "billers." Each biller must be approved by MoneyGram after completion of MoneyGram's "Know Your Agent" process. MoneyGram does not

¹ A consumer may also conduct a money transfer by visiting www.moneygram.com and providing a credit card in lieu of cash for the money transfer amount and transfer fee.

knowingly allow any gambling businesses, including but not limited to Internet gambling businesses, to become ExpressPayment billers.

MoneyGram's Compliance Programs

MoneyGram maintains a comprehensive and robust compliance program. When a MoneyGram customer conducts a money transfer, and prior to funds from the transfer being made available to the recipient, MoneyGram compares the name to the United States Treasury Office of Foreign Assets Control's ("OFAC") Specially Designated Nationals ("SDN") List. Any potential matches are investigated. MoneyGram then either clears the money transfer so that it can be delivered to the recipient or blocks the transaction. If MoneyGram concludes a transaction is intended for an entity on the SDN List, MoneyGram makes a report to OFAC.

As a matter of corporate policy, MoneyGram has long prohibited the use of MoneyGram's name, logo and services for any gambling, including but not limited to Internet gambling. In an effort to enforce this prohibition, MoneyGram monitors the Internet to detect use of MoneyGram's name, logo and services in connection with gambling. MoneyGram uses the services of a third party Internet surveillance vendor to assist us with this effort and has done so since 2003.

When our vendor reports use of MoneyGram's name, logo and/or services in connection with Internet gambling, MoneyGram sends a cease and desist demand to the website owner and/or the Internet Service Provider ("ISP") that hosts the site. MoneyGram monitors responses from cease and desist demands through the vendor's reporting functionality. Where necessary, MoneyGram takes additional action to attempt to enforce compliance with its cease and desist demands. MoneyGram's attempts in this area are not always successful.

Realities of Internet Gambling Sites

MoneyGram's vendor's technology, combined with the skills of its trained analysts, provides MoneyGram with Internet surveillance that exceeds anything MoneyGram would be capable of doing solely in-house--regardless of the number of employees who might be assigned to such surveillance. Nonetheless, the vendor's tools can only do so much.

Our vendor has reported to MoneyGram that in searching for sites that both offer gambling content and claim that a customer can use MoneyGram for online payments or to fund an account, the vast majority of sites require that the user download software or enter user credentials (password, etc.) to proceed to the payment screen. Due to legal constraints and system security constraints, neither our vendor nor MoneyGram attempt to bypass firewalls and/or circumvent password protection in order to determine the detailed payment instructions, if any, that the Internet gambling site would provide. Further, neither our vendor nor MoneyGram attempt to download software provided by Internet gambling sites.

For the sole purpose of providing these comments to the proposed Rules, MoneyGram personnel visited several Internet gambling sites that advertise MoneyGram Money Transfer as a method of payment. See Attachment A. This was a time consuming and labor-intensive process to access the sites' payment instructions, as the user must create an account in order to do so.

Please note that in providing the attached sample pages from Internet gambling sites, MoneyGram makes no statement as to whether these sites are advertising or otherwise involved in unlawful Internet gambling. As noted above, MoneyGram has a corporate policy of prohibiting use of its name, logo and services in connection with any gambling.

As you can see on the attached copies of web pages, one site provides the name of an individual in Lima, Peru to whom a money transfer is to be sent.² Other sites direct the user to use a telephone number to contact the gambling company and obtain payment instructions. The sites provide these phone numbers because MoneyGram Money Transfer is a person-to-person payment method, and the sites must provide the name of a receiver for the transfer, and if the transfer is to be sent outside of the U.S., the name of the country where it is to be received.

Were MoneyGram to contact the sites as instructed, the sites would provide the name of an individual, *i.e.*, John Smith, Jane Johnson etc. to be named as the receiver of the money transfer and might also direct the sender to send money to a particular country.³ It is highly likely that Internet gambling sites change these names frequently and maintain an extensive list of possible receiver names and countries.

The U.S. Government Should Maintain a Prohibited List

MoneyGram is no different than any of the payment system participants proposed for exemption from the Regulations in that MoneyGram cannot on its own identify and block, or otherwise prevent or prohibit transactions restricted by the Act. Requiring an entity like MoneyGram to interpret gambling laws and then identify offending gambling businesses or individuals is simply not a realistic method to implement the Act. Imposing these same requirements on a multitude of participants in U.S. payment systems increases the total cost of the proposed Rules exponentially and unreasonably.

Appropriately trained officials of a U.S. Government agency are in the only position to determine whether a particular business or individual is involved in unlawful Internet gambling and whether a payment to that business or individual is made for unlawful Internet gambling. Therefore, the U.S. Government should develop and maintain a list of unlawful Internet gambling businesses, including the names of individual owners of such businesses and the names of "cashiers" or other personnel at such businesses to whom payments for unlawful Internet gambling are to be delivered.

² MoneyGram has set its system such that money transfers may not be made to this named individual.

³ MoneyGram notes that some sites appear to be attempting to comply with the Act by refusing to allow an account to be opened by a user who indicates that he/she resides in the U.S.

Money services businesses like MoneyGram, as well as financial institutions and other members of the payments industry, can and should participate in the creation and maintenance of the list. This can be accomplished by reporting suspected unlawful Internet gambling businesses (and owners or other involved personnel) to the U.S. Government on an ongoing basis. The U.S. Government can investigate the businesses (and owners or other involved personnel) and determine whether to include them on the prohibited list.

A money transfer business like MoneyGram would then run the names of money transfer recipients against the U.S. Government's prohibited list and would block a money transfer involving a listed business or person in a manner similar to the process currently used to block transfers to businesses or individuals on OFAC's SDN List. Given the requirements of OFAC, businesses like MoneyGram have established systems and procedures that can be modified to block transactions to known unlawful Internet gambling businesses and gamblers. If the U.S. Government maintains a prohibited list, MoneyGram and other money transmitting businesses can fulfill the purpose of the Act.

While it is a reality that unlawful Internet gambling businesses can change their names and/or personnel with relative ease, this is true regardless of whether the U.S. Government maintains a prohibited list or entities like MoneyGram attempt to create their own lists. A centralized list maintained by skilled members of U.S. Government agencies with the input of multiple payment systems participants is the only effective way to monitor and respond to such changes.

Additional Comments

Definitions

§ __.2(j) Financial institution.

This definition could be interpreted as being broader than intended. MoneyGram suggests that a definition of "account belonging to a consumer" be added to the Regulations to make this definition precise.

Policies and Procedures

§ __.6(e) Money transmitting business examples.

MoneyGram currently maintains most of the policies and procedures as described in subsection (e).⁴ As noted above, MoneyGram screens all billers that accept payments via MoneyGram's ExpressPayment service. MoneyGram does not enter into relationships with billers in certain industries, including gambling. As part of its ongoing compliance activities, MoneyGram also maintains procedures to monitor and analyze payment patterns to detect suspicious payment volumes. As noted above, for over four

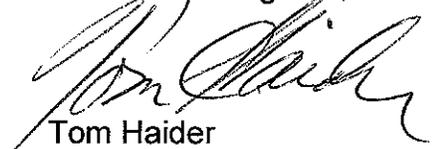
⁴ MoneyGram finds subsection (e)(3) to be confusing, in particular in its use of the undefined terms "recipients" and "account." As such, MoneyGram makes no comment on this particular example.

years, MoneyGram has conducted Internet surveillance to detect use of MoneyGram name, logo or service in connection with Internet gambling.

Overall, MoneyGram believes the Money transmitting business examples provided in §___.6(e) are not sufficient to prevent consumers from using money transmitting businesses to transfer funds for unlawful Internet gambling. The only realistic and meaningful method to prevent restricted transactions (as defined by the proposed Rules) is for the U.S. Government to maintain a list of unlawful Internet gambling businesses, including the names of individual owners of such businesses and the names of "cashiers" or other personnel at such business to whom payments for unlawful Internet gambling are to be delivered. The U.S. Government should also include other adequate descriptors of entities it places on this list, including descriptors such as address, date of birth, place of birth, governmental ID numbers etc. To do otherwise would create a situation where law abiding individuals with common names are unfairly denied money transfer services.

On behalf of MoneyGram, thank you for this opportunity to comment on this important topic. If you wish to discuss our comments further, please contact me.

With kindest regards,



Tom Haider
SVP, Government Affairs
Chief Compliance Officer

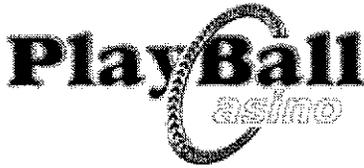
encl.

cc via U.S. Mail: Department of the Treasury
Office of Critical Infrastructure Protection and Compliance Policy
Room 1327, Main Treasury Building
1500 Pennsylvania Avenue, NW
Washington DC 20220

Re: Treas-DO
Docket Number Treas-DO 2007-0015

COMING SOON: new look / mobile wager / poker room

[signup](#) | [cashier](#) | [backup #'s](#) | [live help](#)



Attachment A

888-333-PLAY

wagering: 800-720-6433

User Name:

Password:

Welcome to GoTo Entertainment's © playballcasino.com: your local internet casino, sportsbook & poker room since 1997



SPORTSBOOK



CASINO



What's NEW



BONUSES / SPECIALS

**ANY WAGER
ANY SPORT
ANY TIME
..... & NOW ANYWHERE**
Place your sports and horse wagers from your internet, phone and now mobile with your cel phone or PDA.

FLASH CASINO
Instantly play Vegas style casino games with no download. Get your action down for as little as 25 cents or jump up to the high roller tables.

Join for FREE
Free Casino Sportsbook

NFL is BACK!

NFL Playoff chase
NFL Fantasy Match-ups
NCAA Bowl games
Hoops and Hockey

**Up to 30%
CASH
Bonus!**

for X-MAS Re-Ups

contact us For details!

WAGERING SPECIALS*
fri: Free 1/2 Point
sat: Lay 105 on NFL sides
mon: 2team 7pt teaser -110

Mayweather Vs Hatton

Future/ODDS to WIN and more.

WE PAY TRACK ODDS on all horse tracks.
Over 50 horse tracks to wager on

DEPOSIT BONUSES
New account: 15% cash
Re-Ups: 15% Cash
Refer a friend: \$50*

LOYALTY BONUSES
sportsbook
5% cash back monthly
casino
10% cash back weekly
horses
15% cash back monthly

LIVE LINES

- | | |
|---|---|
| FOOTBALL
sides/totals
1st & 2nd half
money-lines
every quarter
futures/prop's | BASKETBALL
sides/totals
1st & 2nd half
money-lines
futures
propositions |
| BASEBALL
sides/totals
run lines
1st 5 innings
futures/prop's | HOCKEY
puck-lines/totals
money-lines
futures
propositions |
| GOLF
odds to win
tourn matchups
daily matchups | HORSES
win/place/show
exactas/tri's/dd's
futures |
| SOCCER
sides/totals | TENNIS
odds to win
matchups |
| NASCAR
odds to win
matchups | TV / POLITICS
odds to win |



Blackjack
\$1 - \$250



Craps
\$1 - \$250



Stud Poker
\$1 - \$150



Roulette
\$1 - \$200



Paigow
\$1 - \$100



Baccarat
\$1 - \$100



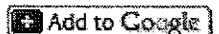
Slots
\$0.25 - \$3



Video Poker
\$0.25 - \$25



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New Account Signup

Dear [REDACTED]

Thank you for becoming a member of **netcashier**. Your account details appear below. Please keep them private to maintain the security of your account.

Account ID	[REDACTED]
Password	[REDACTED]

For your records, an email confirming your account has been emailed to [REDACTED]@moneygram.com and should arrive in a few minutes. If you should have any questions about your account, please reply to this email message.

Thanks again and welcome.
-The Staff at netcashier-



68811

[Print this page for your records.](#)

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Cashier

Deposit

Payout



Deposit to your account

Welcome

Deposit to your **netcashier** account via one of our popular payment methods below. Your account will be funded immediately so you can begin wagering right away. Or if you prefer, you can contact one of our friendly Customer Service Representatives toll free at **888-333-PLAY (7529)** who will be happy to assist you.

Thank you for your patronage.

-The Staff at netcashier-

P.S. Qualifying customers automatically receive a 15% Re-up bonus!

Deposit Methods by Country:

Person to Person Money Transfer - Send money worldwide

Transfer money safely and securely via our WU Transfer option. Available worldwide via walk-in offices, online, or by phone. Just call our Customer Services department at 888-333-PLAY (7529) or use our form to get instructions. If you have made your transfer, go to Step 2 to provide your confirmation number so we can verify the transaction and update your account within minutes.

*** For Wunions using credit card, please call customer service for the recipient information.**



Step 1: Deposit using WU Money Transfer

Step 2: Enter WU Money Transfer Confirmation Number

VISA and MasterCard

Yes! We accept Visa and MasterCard. Just use our friendly deposit form and your account will be funded instantly on-line.



Deposit using Visa or MasterCard

Please fill out and send us our Credit/Debit Card Authorization Agreement following any successful credit/debit card deposit. This completed form is required for the processing of any payouts to your account.

Deposit by Phone

Our Customer Service representatives are available to assist you by phone to complete your deposit. Multiple deposit options are available. It's quick and secure. Call now!



Just call **888-333-PLAY (7529)**

Customer Service and Deposit Help

Some issuing banks have restricted the use of credit cards for online entertainment. Please feel free to use one of the alternative 3rd party payment methods above or contact our Customer Services Representatives toll free at **888-333-PLAY (7529)** to fund your account.

Please Note: Depending on your issuing bank, credit card transactions could be treated as a cash advance. netcashier cannot be held responsible for any cash advance fees involved in this transaction as this is established by the credit card's

issuing bank. Consult with your bank for further details.

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Cashier Deposit Payout



Deposit to your account

**Please wait while we process your request
Status: Instructions Received**

Thank you [REDACTED]

To fund your account via **Western Union** follow the steps below:

1. Please call **Western Union** at **1-800-325-6000** or visit your nearest Western Union location or Send Money online at http://www.westernunion.com.
2. Send a **Person to Person International Transfer** of **\$50.00 USD**.

To: [REDACTED]
From: [REDACTED]

3. You will receive a control number. Please record it below and return to **Step 2** of the **Money Transfer** process and provide your **Trace ID** of [REDACTED] and **control number**.

TraceID: [REDACTED]

control number: _____ (10 Digits)

Do not proceed if you intend on using a credit card to pay for your transaction. We are not responsible for delays or charges. If you wish to use a credit card, please go back and indicate that choice in the form.

Please ensure you request to have your deposit transacted in USD Currency to the receiver. Otherwise, you may have delays in the processing of your request.

If you have any questions or need assistance, please contact our Customer Service department at Accounting@BetGoTo.com or **888-333-PLAY (7529)**.

EPT_WU-68814

Print this page for your records.

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Banking

WU Money Transfer

MoneyGram

Credit Card

Person to Person

Deposits

Join Now!
QUICK STEPS
3
① Register
② Fund Account
③ Win BIG!
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- test
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- Falcons' Hall fined, won't start against Texans
- Fleur de listless: At home in the Dome, Saints fall to 0-3

To make a deposit to your account, please call Customer Service at **1-866-724-BETS**. One of our Representatives will then explain several funding options and help you choose which one best fits your needs.

Please note that Neteller deposits and withdrawals are accepted from countries other than the US, Canada and Turkey. For our Neteller Merchant Code information, please call 1-866-724-BETS. Live Help.

The most commonly used methods for depositing are listed below.

Person-To-Person W/U Deposit:

You can send your deposit through any W/U location by using cash at any one of tens of thousands of locations. Go to www.westernunion.com to find the W/U office that is nearest you. You can also use a major credit card with W/U by phone only at 1-800-325-6000. Once you have determined if you are going to use cash at a walk-in location or a credit card via telephone, call our Customer Support Department at 1-866-724-BETS and one of our Representatives will provide you with a Receiver's name and the payout location. You must indicate to our Representative if you plan to use cash or a major credit card with W/U as the Receivers and locations vary, depending on which method you choose. Our Representative will gladly go over the entire W/U process for you step-by-step if this is your first transaction. Once you have the payee and payout location, complete your transaction and then call us at 1-866-724-BETS and relay the information on your W/U receipt. On deposits of \$100 or more, we will always give you credit for the transaction fees and add them to your gaming account in the form of cash available for wagering.

Person to Person MoneyGram Deposit:

MoneyGram is also fast and convenient and there are over 50,000 stores to service you around the world. Go to www.moneygram.com to find the location nearest you. Then call Customer Support at 1-866-724-BETS and follow the exact same steps as with W/U above. Like W/U, we also credit all transaction fees on deposits of \$100 or more.

Cashiers Check, Bank Draft or Bank Wire:

We will reimburse up to \$40 in transfer fees for a Bank Draft, Cashier's Check or Bank Wire on all deposits of \$300 or more. We do not accept either personal checks or money orders. Your wagering account will be credited upon receipt of and confirmation from our bank. However, please be aware that Cashier's Checks and Bank Drafts can take up to six weeks to clear through the International banking system. Therefore, no payout requests will be honored until we receive confirmation from our bank that your Cashier's Check or Bank Draft has completely cleared the banking system. Cashier's Checks or Bank Drafts cannot exceed \$10,000 US each. Bank Wires are credited to your account the same day that we receive confirmation of receipt from our bank and withdrawals are available to you immediately with no waiting period. For complete instructions on how to deposit via Cashier's Check, Bank Draft or Bank Wire, please contact Customer Support at 1-866-724-BETS.

Withdrawals:

All customers are entitled to one free withdrawal per calendar month via Debit Card, Federal Express or Bank Wire. Additional withdrawals in the same month are subject to a standard processing fee of up to \$40. Withdrawals are also available by W/U, but this method does not qualify for a free transaction. The customer is always liable for any W/U transfer fees, regardless of the amount withdrawn. Withdrawal requests are processed on the day they are received, up to 12:00 noon ET on weekdays only. To request a withdrawal, call Customer Support at 1-866-724-BETS. The length of time it takes for you to receive the withdrawal may vary, depending on the method and day of the week. Please ask our Representative for an approximate time frame you should allow between the time of the request and the anticipated receipt of the funds.

Safety and Security:

All of 724Sports.com transactions are processed through a secure payment system. We use cutting-edge processing technologies to ensure our customers receive fast, user-friendly, and completely secure banking services. 724Sports.com operates SSL (Secure Socket Layer) technology for securing our transaction server and MD5 encryption technology for data transfer.

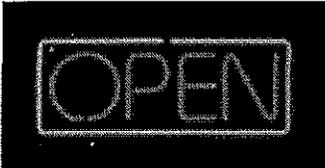


PURCHASE CHIPS

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Please do not engage in conversations on PokerStars or anywhere on the Internet (websites and/or instant messenger) for buying or selling Play Money Chips with anyone who claims to be affiliated with us.

ALL TRANSACTIONS ARE INITIATED IN OUR LIVE CHAT ONLY!

ATTENTION SELLERS:

Please Read about all important changes at the Sell Your Chips section of the website before coming to Live Chat

Welcome to **BigBadBullets.com**,

One of the **Easiest** and **Safest** places to trade with **PokerStars Play Money Chips**. Our goal is 100% satisfaction, thus we strive to ensure secure and honest transactions, so our clients feel safe trading on our website. We also realize many poker lovers have been scammed trying to **sell or buy PokerStars Play Money Chips**, including a lot of our friends, that's why we decided to create this website. We, the **BigBadBullets** team, are entirely dedicated to honest trading, fast transactions and complete customer satisfaction.

If you decide to **buy PokerStars Play Money Chips** we provide one of the safest and most secure environments. We only get a confirmation e-mail for every successful transaction, as your info stays completely confidential.

We **encourage** our customers to register, so they can fully enjoy all benefits of our website. It is easier for us to contact you if we have your information stored on our database. Registration is **mandatory** for **referrals, feedback, and bonuses**, while **everyone can BUY POKERSTARS PLAY MONEY CHIPS at any time.**

Please enjoy your time at **BigBadBullets.com** and if you have any question do not hesitate to contact us. We'll be happy to assist you with anything that you might feel unsure about.

BUY POKERSTARS PLAY MONEY CHIPS

SELL POKERSTARS PLAY MONEY CHIPS



PURCHASE CHIPS

LIVE CHAT

SELL YOUR C



Use Live Chat to make transactions.

STATS

Welcome nora,	
Purchased:	0
Sold:	0
Earned:	0
Referred:	0

Log Out

PAYMENTS



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PURCI

PLEASE READ

WE NO LONGER ACCEPT POKERSTARS REAL MONEY AS A PAYMENT MET

If you wish to purchase chips and there are no operators online, please fill out the Contact Us form, and we will get back to you with further inst

If the OPEN sign (on the left) is on that means we are online and will respond to

needed will come on to Live Chat to help you out as much as we can.

We are regularly checking email so the wait will be minimum, however

REMEMBER to check your email in order to receive our response. TY and C

Our goal at **BigBadBullets.com** is to make the process of purchasing **PokerStars Play Mc** easy and secure as possible. We would give our best to make sure our customers **never** have being scammed or cheated, and we **GUARANTEE** if you transfer money on your end we will s amount of chips to your PokerStars play money account in a timely and fashionable manner.

Please use our Live Chat before placing an order for a faster and satisfactory transaction. Our representatives will guide you through all of the required steps and procedures.

We accept MoneyGram, Western Union, Certified Bank Checks, and Money Ord

>> CLICK THIS BUTTON TO VIEW PRICING <<

Click for **Important Tips** when purchasing chips.

- **MoneyGram / Western Union**
If you decide to purchase play chips with MoneyGram/Western Union the following pr place. After we have agreed on the price, we will give you a name and a location (city, you have to wire the money to. If you wish to send the money online please visit either **MoneyGram** or **Western Union**.
If you prefer to go to a MoneyGram/Western Union location that would probably save Once the money is sent you have to get back to us via email, phone, or simply come by Chat. We would need the transaction number for MoneyGram or the Money Transfer Co (MTCN) for Western Union, the first and last name of the person sending the money, th was sent from (city, state, country), and a phone number. Please be advised that not a will be able to pick up the money in the next 30 minutes or so, that is why you have to which is best for both parties before you transfer the money. After we have picked up t will contact you and complete the transfer on PokerStars.
- **Certified Bank Check / Money Order** : << Click on link for more info.

Please be advised that we will not transfer chips until all payments are received in sure you have an existing PokerStars account prior to placing an order.

Your business is important to us, that is why we would like you to share your experiences at section of our website. The BigBadBullets team would welcome any suggestions, so we can im further.

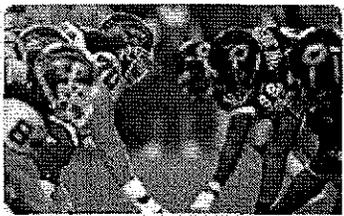
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Win tickets to Super Bowl XLII! Every dollar you wager on the NFL increases your chances!

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Manchester United V Fulham
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LIVE

+1000 bet offers daily



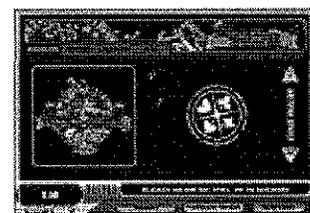
Casino



Mobile Casino!
At home or on the road: Win anytime, anywhere at the Intertops Casino!

Up to USD 100 for FREE!
Check out our 100% Matchup Bonus on your first deposit!

\$45,000 Tecmo Bowl!
Win your share of \$5,000 every weekend!



+100 Vegas style games



Poker

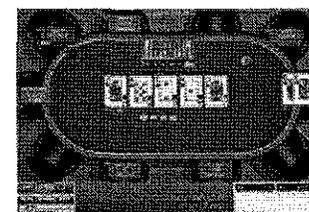


Grab your 500% Deposit Bonus now!
Up to \$10,000 for all new customers!

Play instant Poker: NO DOWNLOAD!

A Penny away from a fortune!
Qualify for our \$175,000 tourneys now!

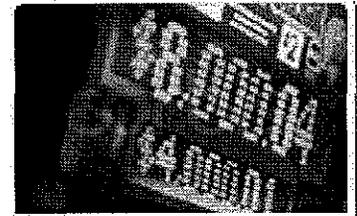
Weekly \$65,000 Extreme Stack Tourney!
Saturday is your lucky poker day!



+60,000 players online



Games



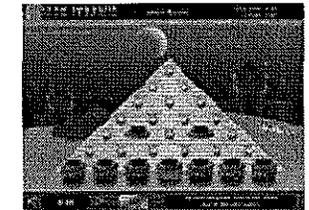
Never has it been so easy to win big!

A new chance every second!

- Sprint for Gold over 100m!

- Virtual horse racing 24/7 with Royal Derby!

- Get as rich as the Pharaohs with Cash Pyramid!



+Win every second



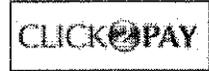
Did you know?

+++ **CASINO:** More than 100 games! - Join the Jackpot trail! - Spin now!
+++

Winners of the Month!

Congratulations to [REDACTED] USD 116,787 (bets on NBA, football plus Casino and Poker)

Payment:



Need assistance?

bet@intertops.com

Phone: 1-866-54-WAGER

Lost your user name or password?

All credit card transactions will carry the descriptor "Intertops.com" and are processed by Ming International Ltd., Vincenti Buildings, 14/19 Strait Street, Valletta VLT 08, Malta.

OVER 18 ONLY : Cybersitter : Cybersentinel : Gamblers Anonymous

Multilingual Assistance: Simplified Chinese | Traditional Chinese | Italian | Japanese | Portuguese | Polish | Arabic | Spanish | Swedish | Turkish



Sign up - One account, all the action

Sign up for your Intertops account and get access to our Sportsbook, Casino, Poker and Games!



Thank you, your registration was successful!

We will send your Username and Password to you by email. If you do not receive your login details, please contact us.

[Forgotten your user name or password?](#)

Here is your new username and password, please make a record of these details and ensure they are kept in a safe place

Username
Password

Next step: Make a deposit, get your \$20 free bet and start winning!



Deposit into your account now and wager in our Sportsbook, play in our Poker Room or win in our Casino or Games Zone.

[» Deposit now!](#)



EU STANDARD BANK TRANSFER



▶ PAYMENT OPTIONS

▶ BALANCE



Bank Wire Transfer

Transfer money by online banking or through your bank.

Please contact us to get the exact bank details for your transaction.

If you want us to credit your account immediately, please send us the following confirmation details:

- Your Intertops Account #
- Amount sent
- Date Sent
- Sender's Bank Name

How?

- Online banking: fax or e-mail us the web-page confirmation details.
- Through your bank: Fax us your Transfer receipt.

Please note that the fees for your transaction varie according to your bank.

As soon as this information is received, we will credit your Intertops betting account and you can wager immediately*!

If you encounter any problems during deposit process, please **contact us**, our service team will be pleased to help you!

*Payouts will be made only after all pending deposit transactions (funds) to your Intertops.com betting account (made prior to your request for the payout) have been successfully cleared and received by Intertops.com. Please note that transfers from North America can take 7 working days to be received by us. Transfers from Asia, Europe and UK can take between 7-12 days to be received.



Contact Information

If you have any questions do not hesitate to contact us!

E-Mail: bet@intertops.com

Telephone, tollfree:

North America 1-866-54-WAGER, 1-866-546-0406 or 1-888-5-366-366

United Kingdom 00-800-3344-3322

Germany, Austria and Switzerland 00-800-4433-4455