

Pat Robertson  
*Founder*



Roberta Combs  
*President*

**Christian Coalition of America**

December 7, 2007

Attn: Jennifer J. Johnson, Secretary  
Board of Governors of the Federal Reserve System  
20th St and Constitution Ave. NW  
Washington, DC 20551

Re: Prohibition on Funding Unlawful Internet Gambling (Docket Number R-1298 / Treas-DO-2007-0015)

Dear Board of Governors:

Thank you for the opportunity to comment on the proposed regulations implementing the Unlawful Internet Gambling Enforcement Act of 2006 (UIGEA). The Christian Coalition of America was one of a diverse array of organizations that supported the enactment of UIGEA to improve enforcement of gambling laws over the Internet. As you well know, most websites offering illegal gambling services to the U.S. market are operated overseas, making prosecution difficult.

The Congressionally-created National Gambling Impact Study Commission recommended in 1999 that the most effective way to stop this illegal traffic in online gambling would be to ban the financial transactions that fuel it. Congress continued to develop this idea, which received overwhelming favorable votes in the House of Representatives in three successive Congresses before UIGEA was finally enacted into law. The final implementing regulations will be the culmination of our long-fought effort to end the evasion of gambling laws on the Internet. Internet gambling represents the most invasive and addictive form of gambling in history.

Speed, accessibility, availability and anonymity make Internet gambling the perfect storm for gambling addiction. Internet gambling also creates fertile ground for criminal activity and threatens families with a variety of financial, physical, and emotional problems, including divorce, domestic violence, child abuse and neglect, and a range of problems stemming from the severe financial hardship that commonly results from pathological gambling.

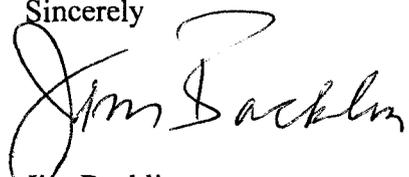
We appreciate the effort your Agencies have put into drafting regulations that fulfill the intent of UIGEA. We particularly welcome your innovative approach to reaching offshore banks that might aid and abet gambling operations. Through their contractual relationships with American financial businesses, these foreign banks can also be held accountable for respecting U.S. law. We are also grateful that the proposed regulations do not exempt any financial system, because a system-wide exemption would create a massive loophole in the law.

There is room, however, for strengthening the proposed regulations. The proposal gives no specifics about what types of penalties are appropriate and when. Financial businesses could, therefore, comply by administering a light slap on the wrist to violators. The regulations should require penalties that would be a meaningful deterrent. Moreover, when wrongdoers are identified, other banks should be informed so they can better monitor potentially problematic customers.

Finally, we are aware that a number of pro-gambling advocates are arguing that UIGEA regulations should only apply in states that explicitly outlaw Internet gambling. We strongly oppose such a suggestion. Every state criminalizes gambling operations that are not explicitly authorized by the state. There is no reason these broad laws should not apply on the Internet. The fact is that taking the unauthorized bet is illegal, regardless of whether the bet is made in person, by telephone, text messaging, Internet, or carrier pigeon.

Thank you for considering the views of the Christian Coalition.

Sincerely

A handwritten signature in cursive script that reads "Jim Backlin". The signature is written in black ink and is positioned above the printed name.

Jim Backlin

Vice President for Legislative Affairs

Christian Coalition of America

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