

From: David Lester <oldbookguy@verizon.net>

Subject: Internet gambling

The following comment is in response to:

**FEDERAL RESERVE SYSTEM
12 CFR Part 233
Regulation GG; Docket No. R-1298
DEPARTMENT OF THE TREASURY
31 CFR Part 132
RIN 1505-AB78
PROHIBITION ON FUNDING OF UNLAWFUL INTERNET GAMBLING**

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

I find these proposed regulations for implementing the Unlawful Internet Gambling Act, 2006 (UIGEA) incredulous at best.

In the UIGEA Regulations Proposal, you state and I quote:

“The costs of implementing a list by the US government to deem certain transactions as unlawful Internet gambling transactions for the banks to use as a guideline were deemed by the Treasury to be 'significant'.

"This is because establishing a list would require considerable fact-finding and legal analysis once the U.S. Government identifies a gambling website. The Government must engage in an extensive legal analysis to determine whether the gambling website is used, at least in part, to place, receive or otherwise knowingly transmit unlawful bets or wagers. This legal analysis would entail interpreting the various Federal and State gambling laws, which could be complicated by the fact that the legality of a particular Internet gambling transaction might change depending on the location of the gambler at the time the transaction was initiated and the location where the bet or wager was received," the regs state.”

So, if establishing a list is too considerable of a job for the unlimited resources of the Federal Government, how in the world do you expect a Bank, ACH or Other Money Business to do this? How are THEY supposed to determine legal from Illegal if NO ONE at a minimum states what is / is not legal?

Are you now relegating to Banks, ACH or Other Money Businesses the ability to set policy and make a finding as to what is legal from illegal?

Please, tell me my government can do better than this.

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