

Defendant: HUNTER DEKKERS
CASE NO.: 2023009072
Page 1 of 4

IN THE
IOWA DISTRICT COURT FOR STORY COUNTY

STATE OF IOWA

VS

HUNTER MICHAEL DEKKERS

Defendant

Before the Presiding
Judge or Magistrate

Iowa District Court

DOB: 07/04/2001 SSN: [REDACTED]

Address: 3600 Coy Street
Ames, Iowa 50014

Criminal No. 2023009072

COMPLAINT

The Defendant, **HUNTER DEKKERS**,

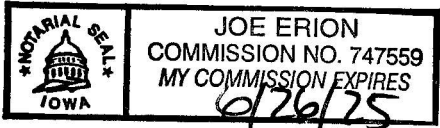
is accused of the crime of **TAMPERING WITH RECORDS**

in that the Defendant did, on or between the dates of **11/07/2021 – 5/02/2023**, in Story County, Iowa, **DID KNOWINGLY AND INTENTIONALLY FALSIFY PERSONAL ELECTRONIC SPORTS WAGERING RECORDS BY CONCEALING HIS PERSONAL IDENTITY IN SAID RECORDS WITH THE INTENT TO DECEIVE OR CONCEAL A WRONGDOING KNOWING HE HAD NO PRIVILEGE OR RIGHT TO DO SO.**

in violation of Section **715A.5** of the Iowa Criminal Code.

Brian Sanger I-160
Signature

Subscribed in my presence and sworn to before me this first day of August, 2023.



[Signature]
Notary Public, State of Iowa

Defendant: HUNTER DEKKERS

CASE NO.: 2023009072

Page 2 of 4

STATE OF IOWA) ss. HUNTER DEKKERS

Story County)

AFFIDAVIT

The undersigned, being first duly sworn, states the following in support of probable cause to believe the offense charged hereon has been committed and that the Defendant has committed it:

In 2018, the Professional and Amateur Sports Protection Act (PASPA), also known as the Bradley Act, was judicially overturned by the United States Supreme Court. This landmark decision effectively eliminated federal restrictions, allowing for the legalization of sports wagering. Consequently, individual states were granted the authority to legalize and regulate sports wagering within their jurisdictions. Iowa joined this movement in May 2019, becoming the 11th state in the nation to legalize sports wagering. Currently, there are nineteen licensed sportsbooks operating in the State of Iowa.

In Iowa, authorized sports wagering operates within a framework defined by specific state laws, rules, and regulations. Private companies offering sports wagering services must obtain a license to operate from the Iowa Racing and Gaming Commission (hereafter referred to as IRGC). Licensed sports wagering companies are required to adhere to a comprehensive set of regulations drafted by IRGC, which aims to ensure the integrity of gambling activities and facilitate proper taxation (IAC 491-13.1(99F)). IRGC is also responsible for approving the "Terms of Use" drafted by licensed sports wagering companies, which establishes enforceable conditions for customers who utilize their wagering platforms. Licensed companies are expected to make reasonable efforts to enforce procedural safeguards and prevent unacceptable and unlawful activities on their platforms.

Iowa code chapters 99F and 99E detail several criminal prohibitions pertaining to sportsbook and fantasy sports wagering. Persons under the age of 21 are prohibited from participating in gambling activities within the state. Individuals are also prohibited from knowingly allowing someone under the age of 21 to place wagers in the state. Any actions that could potentially manipulate or alter the outcome of a game or contest, thereby compromising the integrity of wagering lines, are prohibited.

Iowa code Chapter 80.25A designates the Iowa Division of Criminal Investigation (DCI) as the primary criminal investigative and enforcement agency for the purpose of enforcement of chapters 99D, 99E and 99F. Additionally, the DCI routinely assists gaming authorities by investigating and reporting violations of gaming rules and regulations established by the IRGC. As part of their regular duties, DCI agents also conduct background investigations on licensed gambling companies and their operations.

All sportsbook operators have developed user terms that must be accepted by every customer during the account registration process. To use services provided by the operator, all users must acknowledge they will abide by terms which prohibit the following:

- a) Wagering by a coach, athletic trainer, official, player, or any other individual participating in an authorized sporting event where wagers are accepted
- b) Wagering by a person employed (both paid or volunteer) in positions that involve direct contact with coaches, players, athletic trainers, officials, athletes, or participants in an authorized sporting event where wagers are accepted.
- c) Wagering as an agent or proxies for others.
- d) Wagering in the sport that the customer is an athlete or an affiliated participant. This also includes professional or amateur athletes, sports agents, coaches, team owners, team employees, referees, or league officials, and their immediate family members.
- e) Wagering by individuals under 21 years of age

In early 2023, an investigation initiated by agents with the Iowa Division of Criminal Investigation (DCI) uncovered evidence of HUNTER DEKKERS conducting illicit wagering activities on the DraftKings sportsbook platform. HUNTER

Defendant: HUNTER DEKKERS
CASE NO.: 2023009072
Page 3 of 4

DEKKERS attended Iowa State University and was a player on the football team during the 2020-2021, 2021-2022, and 2022-2023 seasons. HUNTER DEKKERS engaged in a scheme with SCOTT DEKKERS (DOB 07/28/1972) and JAMI DEKKERS (DOB 02/28/1976) enabling HUNTER DEKKERS to disguise his identity and manipulate online/mobile transactions in order to create the appearance that sports wager transactions conducted by HUNTER DEKKERS were made by JAMI DEKKERS.

This deception enabled HUNTER DEKKERS to conceal his unlawful gambling activities from law enforcement and other regulatory bodies.

His actions contravened various legal and regulatory frameworks, including:

- A) Underage Gambling: HUNTER DEKKERS placed wagers while underage, in violation of Iowa's gambling laws. He employed a proxy account registered in the name of an individual who was over the legal age of 21. HUNTER DEKKERS turned 21 on July 4, 2022.
- B) Violation of licensed Sportsbook User Terms and Conditions: HUNTER DEKKER's wagers on DraftKings also violated the platform's User's Terms, as well as rules and regulations administered by the Iowa Racing and Gaming Commission. DraftKings explicitly prohibits individuals from signing up for an account while underage or utilizing the service under another's name.
- C) Breach of University and NCAA Policies: HUNTER DEKKERS use of an account associated with a non-athlete individual allowed him to circumvent scrutiny and sidestep university and NCAA policies regarding student-athlete sports wagering conduct. By using the identity of another, DEKKERS was able to avoid detection and the potential consequences of participation in prohibited activity.
- D) Unfair Wagering and Conflict of Interest: HUNTER DEKKERS placed bets on Iowa State University athletic events, including games and events sponsored by the NCAA and university. This raised concerns regarding unfair wagering advantages, potential access to insider knowledge of athletic participants, and the potential for collusion-related activities.
- E) Tax Implications: HUNTER DEKKER's fraudulent activities also shielded him from potential state and federal tax implications. By concealing his identity during his sports wagering transactions, any tax responsibilities would fall on the stand-in's name listed on the account.

When placing wagers on the DraftKings platform, an individually unique "Bet Ticket ID" digital record is generated. This number is utilized by DraftKings to distinguish one wager from all others. Each wager placed by DEKKERS generated a "Bet Ticket ID" digital record. Each "Bet Ticket ID" digital record identified below correspond to a specific timestamped wager placed by DEKKERS. The "Bet Ticket ID's" listed are not all inclusive of DEKKERS's sports wagering activity; however, they all meet the following conditions:

- 1) Wagers routinely and consistently placed from HUNTER DEKKERS personal iPhone.
- 2) Wagering transactions that required possession of HUNTER DEKKERS protected iPhone to unlock and access his DraftKings account using a specific username and password.
- 3) Corresponded to HUNTER DEKKER's known locations, including his university residence and areas of the university not routinely open to the public
- 4) Involved prohibited wagering activity related to sporting events, such as NCAA-sanctioned contests and events sponsored by the Iowa State Athletic Department.
- 5) Transacted within Story County, Iowa.

The following "Bet Ticket Ids" digital records were transacted on an iPhone controlled by HUNTER DEKKERS utilizing the name JAMI DEKKERS and the DraftKings' account of 12867487755:

3426390132

Defendant: HUNTER DEKKERS
CASE NO.: 2023009072
Page 4 of 4

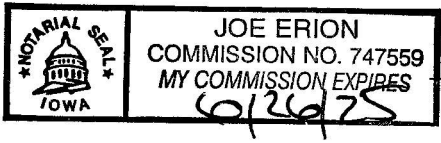
2431679201
1861014004
1830814232
1646218309
1537114028
1385243132
1250766575
1246997093
1224610637
1218519766
1215721267
1171429006
1125451355
1124977302
1123557683

According to subpoenaed records, this DraftKings account (12867487755), which was controlled by HUNTER DEKKERS, completed approximately 366 mobile/online sports wagers. These sports wagers collectively totaled over \$2,799. The last wager placed by DEKKERS, prior to July 4, 2022, was on July 2, 2022. In total, the account controlled by DEKKERS made approximately 297 wagers while DEKKERS was under the age of 21. Approximately 26 wagers were placed on Iowa State University sporting events. One wager was placed on the 2021 Iowa State football game against Oklahoma State.

Brian Sanger I-160

Affiant

Subscribed and sworn to before me this first day of August, 2023.



Joe Erion
Notary Public, State of Iowa

The foregoing Complaint with attached affidavit having been filed before the undersigned, it appears from said Complaint and Affidavit that there is probable cause to believe an offense has been committed and that the Defendant committed the offense.

Dated this _____ day of _____, 2023.

BY THE COURT: _____
Judge/Magistrate