

Defendant: EYIOMA UWAZURIKE
CASE NO.: 2023010833
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IN THE
IOWA DISTRICT COURT FOR STORY COUNTY

STATE OF IOWA

VS

EYIOMA UWAZURIKE

Defendant

Before the Presiding
Judge or Magistrate

Iowa District Court

DOB: [REDACTED]

SSN: [REDACTED]

Address: [REDACTED]

Criminal No. 2023010833

COMPLAINT

The Defendant, EYIOMA AKUNNA UWAZURIKE

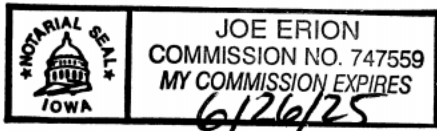
is accused of the crime of TAMPERING WITH RECORDS

in that the Defendant did, on or between the dates of 02/07/2021 –7/10/2022, 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

STATE OF IOWA) ss. EYIOMA UWAZURIKE

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 EYIOMA UWAZURIKE [REDACTED] conducting illicit wagering activities on the FanDuel sportsbook platform. EYIOMA UWAZURIKE attended Iowa State University and was a player on the football team during the 2016-2017, 2017-2018, 2018-2019, 2019-2020, 2020-2021 and 2021-2022 seasons. EYIOMA UWAZURIKE was selected by the Denver Broncos in the fourth round of the 2022 NFL draft and is still on their roster of players.

EYIOMA UWAZURIKE engaged in a scheme with RACHEL LOUISE FRANCIS [REDACTED] enabling UWAZURIKE to disguise his identity and manipulate online/mobile transactions in order to create the appearance that sports wager transactions conducted by UWAZURIKE were made by FRANCIS.

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

His actions contravened various legal and regulatory frameworks, including:

- A) Violation of licensed Sportsbook User Terms and Conditions: UWAZURIKE's wagers on FanDuel also violated the platform's User's Terms, as well as rules and regulations administered by the Iowa Racing and Gaming Commission. FanDuel explicitly prohibits individuals from signing up for an account while underage or utilizing the service under another's name.
- B) Breach of University and NCAA Policies: EYIOMA UWAZURIKE's 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, UWAZURIKE was able to avoid detection and the potential consequences of participation in a prohibited activity.
- C) Unfair Wagering and Conflict of Interest: EYIOMA UWAZURIKE 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.
- D) Tax Implications: EYOIMA UWAZURIKE'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 FanDuel platform, an individually unique "Wage Identifier" digital record is generated. This number is a digital record utilized by FanDuel to distinguish one wager from all others. Each wager placed by FanDuel generated a "Wage Identifier" digital record. Each "Wage Identifier" identified below correspond to a specific timestamped wager placed by UWAZURIKE. The "Wage Identifier" listed are not all inclusive of UWAZURIKE's sports wagering activity; however, they all meet the following conditions:

- 1) Wagers routinely and consistently placed from UWAZURIKE's personal iPhone.
- 2) Wagering transactions that required possession of UWAZURIKE's protected iPhone to unlock and access his FanDuel account using a specific username and password.
- 3) Corresponded to EYIOMA UWAZURIKE'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 "Wager Identifier" were transacted on an iPhone controlled by EYIOMA UWAZURIKE utilizing the name RACHEL FRANCIS and the FanDuel User ID of 13763550.

FanDuel Wager Identifier:

13378133.53
13181223.53
6582292.526
6395654.526
6312590.526

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5662608.526
5594198.526
5366612.526
3415582.526
2788741.526
2556011.526
2543639.526
2441095.526
534048.526

According to subpoenaed records, this FanDuel account (13763550), which was controlled by EYIOMA UWAZURIKE, completed approximately 801 mobile/online sports wagers. These sports wagers collectively totaled over \$21,361. Four wagers were placed on Iowa State University football games, including the following 2 games UWAZURIKE participated in:

09/11/2021 Iowa at Iowa State
10/02/2021 Kansas at Iowa State

Additionally, the account placed approximately 32 wagers on NFL Denver Bronco events and individual NFL Bronco players. At the time the wagers were placed, UWAZURIKE had been drafted to the Broncos. These wagers included the following NFL games:

09/12/2022 Week 1 Denver Broncos at Seattle Seahawks
09/18/2022 Week 2 Houston Texans at Denver Broncos
09/25/2022 Week 3 San Francisco 49ers at Denver Broncos
12/11/2022 Week 14 Kansas City Chiefs at Denver Broncos
12/18/2022 Week 15 Arizona Cardinals at Denver Broncos

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