



Office of the Secretary

United States of America
FEDERAL TRADE COMMISSION
Washington, D.C. 20580

November 28, 2017

Christopher Jahn
Outside the United States

Dear Mr. Jahn:

Thank you for your comment regarding the above-referenced matter. Your letter was placed on the public record pursuant to Commission Rule 2.34, 16 C.F.R. § 2.34, and was given serious consideration by the Commission.

In your comment, you object to the proposed settlement because it does not provide for fines or prison time. The Commission's proposed complaint alleges violations of Section 5 of the FTC Act, and the Commission is not authorized to collect fines or penalties based on such violations. Neither does the Commission have criminal prosecutorial authority. The Commission has determined that the conduct relief obtained by the order will serve to remedy the alleged violations of the FTC Act by CSGOLotto, Inc., Trevor Martin, and Thomas Cassell and deter future violations. In addition, they will be subject to the Commission's final order for twenty years and liable for civil penalties of up to \$40,000 per violation should they violate that order, pursuant to Section 5(l) of the FTC Act, 15 U.S.C. § 45(l).

We have taken into consideration your comment and how it intersects with the Commission's federal, non-criminal law enforcement authority. After carefully considering your comment, along with others received in this matter, the Commission has determined that the public interest is best served by issuing the Decision and Order in final form without modification. A copy of the final Decision and Order, and other relevant materials, are available from the Commission's website at <http://www.ftc.gov>.

Thank you again for your comment. The Commission is aided in its analysis by hearing from a variety of sources, and we appreciate your interest in this matter.

By direction of the Commission.

Donald S. Clark
Secretary



United States of America
FEDERAL TRADE COMMISSION
Washington, D.C. 20580

Office of the Secretary

November 28, 2017

Maloney
State of New Jersey

Re: *In the Matter of CSGOLotto, Trent Martin and Thomas Cassell*
FTC File No. 162-3184, Docket No. C-4632

Thank you for your comment regarding the above-referenced matter. Your letter was placed on the public record pursuant to Commission Rule 2.34, 16 C.F.R. § 2.34, and was given serious consideration by the Commission.

In your comment, you object to the proposed settlement because it does not provide for a “larger punishment.” The Commission’s proposed complaint alleges violations of Section 5 of the FTC Act, and the Commission is not authorized to collect fines or penalties based on such violations. Neither does the Commission have criminal prosecutorial authority. The Commission has determined that the conduct relief obtained by the order will serve to remedy the alleged violations of the FTC Act by CSGOLotto, Inc., Trevor Martin, and Thomas Cassell and deter future violations. In addition, they will be subject to the Commission’s final order for twenty years and liable for civil penalties of up to \$40,000 per violation should they violate that order, pursuant to Section 5(l) of the FTC Act, 15 U.S.C. § 45(l).

We have taken into consideration your comment and how it intersects with the Commission’s federal, non-criminal law enforcement authority. After carefully considering your comment, along with others received in this matter, the Commission has determined that the public interest is best served by issuing the Decision and Order in final form without modification. A copy of the final Decision and Order, and other relevant materials, are available from the Commission’s website at <http://www.ftc.gov>.

Thank you again for your comment. The Commission is aided in its analysis by hearing from a variety of sources, and we appreciate your interest in this matter.

By direction of the Commission.

Donald S. Clark
Secretary



Office of the Secretary

United States of America
FEDERAL TRADE COMMISSION
Washington, D.C. 20580

November 28, 2017

Jack Thorpe
State of Michigan

Re: *In the Matter of CSGOLotto, Trent Martin and Thomas Cassell*
FTC File No. 162-3184, Docket No. C-4632

Dear Mr. Thorpe:

Thank you for your comment regarding the above-referenced matter. Your letter was placed on the public record pursuant to Commission Rule 2.34, 16 C.F.R. § 2.34, and was given serious consideration by the Commission.

In your comment, you object to the proposed settlement because it does not provide for fines or prison time. The Commission's proposed complaint alleges violations of Section 5 of the FTC Act, and the Commission is not authorized to collect fines or penalties based on such violations. Neither does the Commission have criminal prosecutorial authority. The Commission has determined that the conduct relief obtained by the order will serve to remedy the alleged violations of the FTC Act by CSGOLotto, Inc., Trevor Martin, and Thomas Cassell and deter future violations. In addition, they will be subject to the Commission's final order for twenty years and liable for civil penalties of up to \$40,000 per violation should they violate that order, pursuant to Section 5(l) of the FTC Act, 15 U.S.C. § 45(l).

We have taken into consideration your comment and how it intersects with the Commission's federal, non-criminal law enforcement authority. After carefully considering your comment, along with others received in this matter, the Commission has determined that the public interest is best served by issuing the Decision and Order in final form without modification. A copy of the final Decision and Order, and other relevant materials, are available from the Commission's website at <http://www.ftc.gov>.

Thank you again for your comment. The Commission is aided in its analysis by hearing from a variety of sources, and we appreciate your interest in this matter.

By direction of the Commission.

Donald S. Clark
Secretary