

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF WISCONSIN

THE UNITED STATES OF AMERICA
and COMMODITY FUTURES TRADING
COMMISSION,

Plaintiffs,

v.

Case No. 26-CV-749

STATE OF WISCONSIN, et al.,

Defendants.

ANSWER

Defendants State of Wisconsin and Attorney General Joshua Kaul answer Plaintiffs United States of America and the Commodity Futures Trading Commission's complaint as follows:

1. The first two sentences state legal conclusions to which no response is required; to the extent any further response is necessary, the cited authorities speak for themselves, and Defendants DENY any characterizations inconsistent with those authorities. As for the third sentence, Defendants ADMIT that Plaintiffs seek the described relief but DENY that they are entitled to it.

2. As to the first sentence, Defendants ADMIT. As to the second sentence, Defendants ADMIT that the referenced companies "offer event

contracts” but lack knowledge as to whether they do so “on CFTC-regulated national markets” and therefore DENY on that basis. As to the remaining sentences, Plaintiffs do not accurately describe Defendants’ substantive claims against each company and therefore DENY those allegations; Defendants otherwise ADMIT that they are seeking the described relief.

3. Defendants ADMIT the existence of the cited press release; that press release speaks for itself, and Defendants DENY any characterizations inconsistent with its content.

4. To the extent this paragraph characterizes Defendants’ claims in other litigation, DENY that it does so accurately. This paragraph otherwise contains legal conclusions to which no response is required; to the extent any further response is necessary, the referenced authorities speak for themselves, and Defendants DENY any characterizations inconsistent with those authorities.

5. To the extent this paragraph characterizes Defendants’ claims in other litigation, DENY that it does so accurately. Defendants lack knowledge regarding the facts alleged in the second sentence and therefore DENY on that basis. This paragraph otherwise contains legal conclusions to which no response is required; to the extent any further response is necessary, the referenced authorities speak for themselves, and Defendants DENY any characterizations inconsistent with those authorities.

6. This paragraph contains legal conclusions to which no response is required; to the extent any further response is necessary, the referenced authorities speak for themselves, and Defendants DENY any characterizations inconsistent with those authorities.

7. Defendants lack knowledge regarding the facts alleged in this paragraph and therefore DENY on that basis.

8. This paragraph references Defendants' filings in separate litigation that speak for themselves; Defendants DENY any characterization inconsistent with those filings.

9. This paragraph contains legal conclusions to which no response is required; to the extent any further response is necessary, the referenced authorities speak for themselves, and Defendants DENY any characterizations inconsistent with those authorities.

10. This paragraph references Defendants' filings in separate litigation that speak for themselves; Defendants DENY any characterization inconsistent with those filings. This paragraph otherwise contains legal conclusions to which no response is required; to the extent any further response is necessary, the referenced authorities speak for themselves, and Defendants DENY any characterizations inconsistent with those authorities.

11. Defendants ADMIT that they are continuing to pursue the litigation referenced in paragraph 2. This paragraph otherwise contains legal conclusions to which no response is required; to the extent any further response is necessary, the referenced authorities speak for themselves, and Defendants DENY any characterizations inconsistent with those authorities.

12. This paragraph contains legal conclusions to which no response is required; to the extent any further response is necessary, the referenced authorities speak for themselves, and Defendants DENY any characterizations inconsistent with those authorities.

13. This paragraph contains legal conclusions to which no response is required; to the extent any further response is necessary, the referenced authorities speak for themselves, and Defendants DENY any characterizations inconsistent with those authorities.

14. This paragraph contains legal conclusions to which no response is required; to the extent any further response is necessary, the referenced authorities speak for themselves, and Defendants DENY any characterizations inconsistent with those authorities.

15. Defendants ADMIT that the United States of America and the CFTC are parties to this case. Otherwise, this paragraph contains legal conclusions to which no response is required; to the extent any further response

is necessary, the referenced authorities speak for themselves, and Defendants DENY any characterizations inconsistent with those authorities.

16. Defendants ADMIT that the CFTC is a federal agency. Otherwise, this paragraph contains legal conclusions to which no response is required; to the extent any further response is necessary, the referenced authorities speak for themselves, and Defendants DENY any characterizations inconsistent with those authorities.

17. Defendants ADMIT the first sentence; the second sentence contains legal conclusions to which no response is required.

18. Defendants ADMIT the first sentence. The second sentence contains legal conclusions to which no response is required; to the extent any further response is necessary, the referenced authorities speak for themselves, and Defendants DENY any characterizations inconsistent with those authorities.

19. Defendants ADMIT. The second sentence contains legal conclusions to which no response is required; to the extent any further response is necessary, the referenced authorities speak for themselves, and Defendants DENY any characterizations inconsistent with those authorities.

20. Defendants note that the State of Wisconsin Department of Administration Division of Gaming is no longer a party to this case. In any event, Defendants ADMIT that the State of Wisconsin Department of

Administration Division of Gaming is a Wisconsin state agency. Otherwise, the paragraph contains legal conclusions to which no response is required; to the extent any further response is necessary, the referenced authorities speak for themselves, and Defendants DENY any characterizations inconsistent with those authorities.

21. Defendants note that John Dilleth is no longer a party to this case. In any event, Defendants ADMIT.

22. Defendants lack knowledge regarding the facts alleged in this paragraph and therefore DENY on that basis. The second sentence contains legal conclusions to which no response is required; to the extent any further response is necessary, the referenced authorities speak for themselves, and Defendants DENY any characterizations inconsistent with those authorities.

23. Defendants lack knowledge regarding the facts alleged in this paragraph and therefore DENY on that basis.

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25. Defendants lack knowledge regarding the facts alleged in this paragraph and therefore DENY on that basis. The third sentence contains legal conclusions to which no response is required; to the extent any further response is necessary, the referenced authorities speak for themselves, and Defendants DENY any characterizations inconsistent with those authorities.

26. Defendants lack knowledge regarding the facts alleged in this paragraph and therefore DENY on that basis. The second and third sentence contains legal conclusions to which no response is required; to the extent any further response is necessary, the referenced authorities speak for themselves, and Defendants DENY any characterizations inconsistent with those authorities.

27. This paragraph contains legal conclusions to which no response is required; to the extent any further response is necessary, the referenced authorities speak for themselves, and Defendants DENY any characterizations inconsistent with those authorities.

28. This paragraph contains legal conclusions to which no response is required; to the extent any further response is necessary, the referenced authorities speak for themselves, and Defendants DENY any characterizations inconsistent with those authorities.

29. This paragraph contains legal conclusions to which no response is required; to the extent any further response is necessary, the referenced authorities speak for themselves, and Defendants DENY any characterizations inconsistent with those authorities.

30. This paragraph contains legal conclusions to which no response is required; to the extent any further response is necessary, the referenced authorities speak for themselves, and Defendants DENY any characterizations

inconsistent with those authorities. As to the second sentence, Defendants lack knowledge and DENY on that basis.

31. Defendants lack knowledge regarding the facts alleged in this paragraph and therefore DENY on that basis.

32. This paragraph contains legal conclusions to which no response is required; to the extent any further response is necessary, the referenced authorities speak for themselves, and Defendants DENY any characterizations inconsistent with those authorities.

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63. As to the first sentence, Defendants ADMIT. The remaining allegations summarize litigation filings that speak for themselves, and Defendants DENY any allegation inconsistent with those filings.

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65. As to the first sentence, Defendants ADMIT; the remaining allegations summarize litigation filings that speak for themselves, and Defendants DENY any allegation inconsistent with those filings.

66. Defendants ADMIT that the referenced companies “provide event contracts available for trades.” Otherwise, the paragraph consists of legal conclusions to which no response is required; to the extent any further response is necessary, the referenced authorities speak for themselves, and Defendants DENY any characterizations inconsistent with those authorities.

67. Defendants lack knowledge regarding the facts alleged in this paragraph and therefore DENY on that basis. This paragraph also contains legal conclusions to which no response is required; to the extent any further response is necessary, the referenced authorities speak for themselves, and Defendants DENY any characterizations inconsistent with those authorities.

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83. This paragraph contains legal conclusions to which no response is required; to the extent any further response is necessary, the referenced authorities speak for themselves, and Defendants DENY any characterizations inconsistent with those authorities.

84. The responses to the allegations in the preceding paragraphs are incorporated herein.

85. This paragraph contains legal conclusions to which no response is required; to the extent any further response is necessary, the referenced authorities speak for themselves, and Defendants DENY any characterizations inconsistent with those authorities.

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90. Defendants ADMIT.

91. Defendants DENY.

92. Defendants DENY.

93. Defendants DENY.

REQUESTED RELIEF

Defendants DENY that the Plaintiffs are entitled to any of their requested relief.

Dated this 12th day of August 2026.

Respectfully submitted,

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