











December 18, 2025

Via Email and U.S. Mail

Brandon Johnson
The Honorable Mayor of the City of Chicago
Office of the Mayor
City Hall
121 North LaSalle Street
Chicago, Illinois 60602

Re: Municipal Licensing for Online Sports Wagering Operators
Request for Meeting and Delayed Implementation

Dear Mayor Johnson:

On behalf of the Sports Betting Alliance, thank you for directing representatives of your Office and the Commissioner of the Department of Business Affairs and Consumer Protection ("BACP") to meet on Monday to discuss the proposed City license requirement for online sports wagering operators. A proposed agenda is attached.

As drafted, the proposed budget and revenue ordinance would impose a City licensing requirement effective January 1, 2026, yet the City does not currently have a licensing rubric that contemplates online sports wagering operators. In the absence of defined terms, application standards, required documentation, and administrative procedures, operators would have no meaningful way to comply with the ordinance upon its effective date. It is urgent that your Office takes action to develop a cogent licensing framework and to delay the effective date by at least 180 days to allow operators to understand the requirements, prepare and submit complete applications, and obtain the necessary City licenses prior to enforcement.

Online sports wagering operators are highly regulated entities that cannot lawfully operate without all required licenses. Absent published standards and a functioning application and issuance process, operators cannot continue to legally conduct business in the City. A shut-down of online sports wagering in Chicago, however temporary, would undermine the



ordinance's revenue and policy objectives by driving consumers to online platforms that dodge laws that ensure consumer protection, age verification, and responsible gaming protections. A shut down of legal online platforms will also risk jeopardizing millions, if not tens of millions, of dollars in state revenue.

Notwithstanding our request for delayed implementation, the Sports Betting Alliance reiterates our position that the City should not pass the ordinance in its current form. Instead, the City should work collaboratively with the gaming industry to pursue more durable and permanent revenue solutions, including potential amendments to state law that would support long-term revenue generation for the City while maintaining regulatory integrity and consumer protections.

Sincerely,

Jeremy Kudon Chairman, Sports Betting Alliance

Ivan Capifali, Commissioner of Business Affairs and Consumer Protection cc:

Honorable Members of the Chicago City Council

Members of the Administration of Mayor Brandon Johnson



Proposed Agenda:

- (1) Licensing categories and definitions for online sports wagering operators and affiliated service providers
- (2) Structure and administration of any "primary" and "secondary" license regime
- (3) Application requirements, processing timelines, fees, renewal terms, and compliance obligations
- (4) Enforcement expectations and mechanisms during the transition and beyond