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11 **FIRST JUDICIAL DISTRICT COURT**
12 **CARSON CITY, NEVADA**

13 STATE OF NEVADA ex rel. NEVADA
14 GAMING CONTROL BOARD,

15 Plaintiffs,

16 vs.

17 BLOCKRATIZE, INC. d/b/a
18 POLYMARKET; QCX LLC d/b/a
POLYMARKET US; ADVENTURE ONE
19 QSS, INC. d/b/a POLYMARKET,

20 Defendants.

Case No.: 240c 0012 13
Dept. No.: I

21 **COMPLAINT FOR PERMANENT**
22 **INJUNCTION AND DECLARATORY**
23 **RELIEF**

24 Hearing Requested

1 COMES NOW, Plaintiff, STATE OF NEVADA, ex rel. NEVADA GAMING
2 CONTROL BOARD, by and through its attorneys, files this Complaint for BLOCKRATIZE,
3 INC., d/b/a POLYMARKET; QCX LLC d/b/a POLYMARKET US; ADVENTURE ONE QSS,
4 INC., d/b/a POLYMARKET's violations of State of Nevada gaming laws and hereby asserts
5 and alleges as follows:

6 **PARTIES**

7 1. At all times relevant hereto, STATE OF NEVADA, ex rel. NEVADA GAMING
8 CONTROL BOARD ("BOARD") was and is a political subdivision of the State of Nevada
9 established pursuant to NRS 463.030. The BOARD is charged with the responsibility of
10 strictly regulating gaming in the State of Nevada because gaming is vitally important to
11 the State, its economy, and the general welfare of its inhabitants.

12 2. At all times relevant hereto, BLOCKRATIZE, INC. d/b/a POLYMARKET;
13 QCX LLC d/b/a POLYMARKET US; ADVENTURE ONE QSS, INC. d/b/a POLYMARKET
14 (collectively "POLYMARKET") was and is a financial services company with its principal
15 places of business in New York and Florida. POLYMARKET operates a derivatives
16 exchange and prediction market ("market") where it offers products referred to as event
17 contracts for sale. These products are offered for sale on POLYMARKET's mobile app and
18 are made available to persons located in Nevada.

19 **GENERAL ALLEGATIONS**

20 **A. Nevada has a strong interest in regulating gaming in Nevada.**

21 3. The State of Nevada has a long history of gambling regulation and is the
22 leader in gambling regulation in the United States.

23 4. In 1931, the Nevada Legislature legalized gambling in the State.

24 5. The Nevada Gaming Control Act of 1949 shifted gaming licensing from local
25 government to state government.

26 6. With the passage of the Nevada Gaming Control Act, Nevada became the first
27 State in the Nation to legalize sports betting.
28

1 7. “It is established beyond question that gaming is a matter of privilege
2 conferred by the State rather than a matter of right.” *State v. Rosenthal*, 93 Nev. 36, 40,
3 559 P.2d 830, 833 (1977).

4 8. Nevada’s public policy, as expressed by the Legislature, is that “[t]he gaming
5 industry is vitally important to the economy of the State and the general welfare of the
6 inhabitants” and that “[a]ll establishments where gaming is conducted . . . must therefore
7 be licensed, controlled and assisted to protect the public health, safety, morals, good order
8 and general welfare of the inhabitants of the State, to foster the stability and success of
9 gaming and to preserve the competitive economy and policies of free competition of the
10 State of Nevada.” NRS 463.0129(1)(a)-(d).

11 9. The Legislature has conclusively determined that “[p]ublic confidence and
12 trust can only be maintained by strict regulation of all persons, locations, practices,
13 associations and activities related to the operation of licensed gaming establishments,”
14 NRS 463.0129(1)(c), and that any activity that reflects “discredit upon the State of Nevada
15 or the gaming industry” may be deemed an unsuitable method of operation by the BOARD
16 and the Nevada Gaming Commission (“COMMISSION”), Nev. Gaming Comm’n Reg.
17 5.011(1).

18 10. Currently, the State of Nevada has a two-tiered regulatory structure to
19 regulate gaming within the State involving the BOARD and COMMISSION.

20 11. Nevada law requires that all gaming activity be strictly regulated and
21 licensed, as the gaming industry is “vitally important to the economy of the State and the
22 general welfare of the inhabitants.” NRS 463.0129(1)(a).

23 12. Pursuant to Nevada law, the continued growth and success of gaming in the
24 State of Nevada is “dependent upon public confidence and trust that licensed gaming” is
25 “conducted honestly and competitively.” NRS 463.0129(1)(b).

26 13. Pursuant to Nevada law, “public confidence and trust can only be maintained
27 by strict regulation of all persons, locations, practices, associates, and activities related” to
28 the operation of gaming in Nevada. NRS 463.0129(1)(c) (emphasis added).

1 14. Pursuant to Nevada law, all entities making gaming available in Nevada
2 must “be licensed, controlled and assisted to protect the public health, safety, morals, good
3 order and general welfare of the inhabitants of the State.” NRS 463.0129(1)(d).

4 15. Lack of enforcement of Nevada gaming laws against entities that make
5 gaming accessible to persons within the State will severely impact Nevada’s ability to
6 strictly regulate gaming in Nevada and foster Nevada’s gaming industry, which is vitally
7 important to its economy and its citizens.

8 **B. POLYMARKET’s market is a gambling game and/or sports pool and**
9 **accepts wagers in or from Nevada.**

10 16. “Gaming” in Nevada is synonymous with “gambling” and includes any
11 regulated game. NRS 463.0153.

12 17. A “game” subject to regulation in Nevada includes “any game played with . . .
13 equipment or any mechanical or electronic device or machine for money . . . or any
14 representative of value” that is accessible in Nevada. NRS 463.0152.

15 18. POLYMARKET’s products meet the requirements of NRS 463.0152 because a
16 person accesses POLYMARKET’s market through POLYMARKET’s mobile app and the
17 use of the Internet and enters wagers through POLYMARKET’s market with the payment
18 of money. Moreover, POLYMARKET uses electronic devices such as computers and servers
19 to make its wagers available on its mobile app and the Internet. Although
20 POLYMARKET’s website states that POLYMARKET is “not available to . . . persons
21 located in the United States,” users are able to access POLYMARKET by signing up for an
22 account through its mobile app.

23 19. A game subject to regulation in Nevada includes a “sports pool.” NRS 463.160.
24 A “sports pool” is “the business of accepting wagers on sporting events or other events by
25 any system or method of wagering.” NRS 463.0193. A “wager” is “a sum of money or
26 representative of value that is risked on an occurrence for which the outcome is uncertain.”
27 NRS 463.01962.

1 20. POLYMARKET's products meet the requirement of NRS 463.160 and NRS
2 463.0193 because POLYMARKET's market allows users to wager on the outcomes of
3 sporting events and other events for which the outcome is uncertain. These sporting events
4 and other events include, but are not limited to, college basketball games, college and
5 professional football games, and elections. POLYMARKET also has offered wagers related
6 to news events, such as wagers on when arrests would be made in connection with the
7 shootings of Charlie Kirk and at Brown University. See POLYMARKET, *New Arrests in*
8 *Charlie Kirk Shooting by September 30?*, perma.cc/6EQX-JRFP; POLYMARKET, *Brown*
9 *University Shooter Arrested By . . . ?*, perma.cc/U7PA-6PBK.

10 21. POLYMARKET's event contracts are wagers: A user spends a sum of a money
11 to buy an event contract on an outcome of an event, and receives a payout if the outcome
12 occurs and not if the outcome does not occur. For example, as of January 16, 2026, a user
13 could buy an event contract for \$0.36 that would pay out \$1 if the Chicago Bears won their
14 January 18, 2026, NFL playoff game against the Los Angeles Rams—essentially,
15 approximately 3/1 odds. POLYMARKET, *Rams v. Bears*, <https://perma.cc/6YNG-F4PN>.

16 22. A “game” subject to regulation in Nevada includes a “percentage game.” NRS
17 463.1052. A “percentage game” exists where the “house” does not directly participate in a
18 wager and its only stake is a commission derived from wagers. See *Hughes Props. v. State*,
19 100 Nev. 295, 297 (1984).

20 23. POLYMARKET's products meet this requirement because POLYMARKET
21 takes a commission, or percentage, on the wagers placed through its market.
22 POLYMARKET takes a percentage of money wagered through its market in the form of
23 commissions styled as “trading fees.” POLYMARKET, *Fees & Operating Hours*,
24 perma.cc/FWA6-RADG.

25 24. In taking a percentage of the wagers placed through its market,
26 POLYMARKET accepts wagers on sporting events and other events.

1 **C. POLYMARKET’s offerings that are available in Nevada cause harm**
2 **to Nevada.**

3 25. Despite making wagers, sports betting, and other gaming activity (“gaming”)
4 accessible in the State of Nevada, POLYMARKET is not licensed in Nevada and does not
5 comply with Nevada gaming law.

6 26. Nevada law requires every entity that makes gaming activities, including
7 wagers, accessible in Nevada to be subject to a rigorous licensing process and an in-depth
8 investigation of all entities and natural persons who directly or indirectly have an
9 ownership interest in the entity offering the wagers.

10 27. POLYMARKET has not undergone Nevada’s rigorous licensing process for its
11 wagering activities.

12 28. Entities conducting gaming activities in the State of Nevada must pay taxes
13 on gross gaming revenue derived from gaming activities accessible in the State.

14 29. POLYMARKET does not pay taxes on gross gaming revenue derived from
15 gaming activities, including wagers, accessible in the State of Nevada.

16 30. Entities accepting wagers from persons in the State of Nevada must have a
17 physical location in Nevada.

18 31. POLYMARKET does not have a physical location in Nevada for its wagering
19 activity.

20 32. Entities accepting wagers in the State of Nevada on sporting events may not
21 allow persons under 21 years of age to place wagers.

22 33. POLYMARKET allows persons under the age of 21 years of age to place
23 wagers on its market. Specifically, it allows anyone over the age of 18 to create an account
24 and trade on its platform. POLYMARKET, *Polymarket.com Terms of Use*, [perma.cc/L3Y2-](https://perma.cc/L3Y2-U4YS)
25 [U4YS](https://perma.cc/L3Y2-U4YS).

26 34. Entities accepting wagers in the State of Nevada on sporting events must
27 employ safeguards to ensure that wagers are not being placed on an event by owners,
28

1 coaches, players, or officials participating in the event, and must communicate with Nevada
2 gaming regulatory authorities about potential evidence of match fixing or point shaving.

3 35. On information and belief, POLYMARKET does not employ adequate
4 safeguards to ensure that wagers are not being placed on an event from owners, coaches,
5 players, or officials participating in the event, and does not communicate about potential
6 evidence of match fixing or point shaving with Nevada gaming regulatory authorities.

7 **D. POLYMARKET's market violates NRS 463.160.**

8 36. Pursuant to NRS 463.160, it is unlawful for a person to expose a game or a
9 sports pool for play in Nevada without the required gaming licenses.

10 37. POLYMARKET's market exposes a percentage game for play in Nevada.

11 38. POLYMARKET's market exposes a sports pool for play in Nevada.

12 39. POLYMARKET does not possess a Nevada gaming license.

13 40. POLYMARKET does not possess a Nevada sports pool approval.

14 41. POLYMARKET, in making its market available to persons located in Nevada,
15 has violated, and continues to violate, NRS 463.160.

16 **E. POLYMARKET's market violates NRS 463.350.**

17 42. Pursuant to NRS 463.350, a person under the age of 21 may not play, be
18 allowed to play, place wagers at, or collect winnings from any game or sports pool.

19 43. POLYMARKET's market does not restrict persons under the age of 21 from
20 participating.

21 44. POLYMARKET's market constitutes a percentage game and/or sports pool.

22 45. POLYMARKET, in making its market available to persons located in Nevada
23 who are under the age of 21, has violated, and continues to violate, NRS 463.350.

24 **F. POLYMARKET's market violates NRS 465.086.**

25 46. Pursuant to NRS 465.086(1), it is unlawful for any person to directly or
26 indirectly receive any compensation or any percentage or share of the money played
27 for accepting or facilitating any wager upon the result of any sporting event without a
28 gaming license.

1 47. POLYMARKET is not licensed to accept wagers.

2 48. POLYMARKET's market accepts wagers.

3 49. In addition to accepting wagers on the results of sporting events and other
4 events, POLYMARKET's market facilitates wagers on sporting events and other events
5 between individual participants in its market.

6 50. As set out above, these wagers are on sporting events and other events,
7 including elections.

8 51. POLYMARKET takes a percentage of money wagered through its market in
9 the form of commissions.

10 52. POLYMARKET, in making event-based contracts concerning the outcomes,
11 or partial outcomes, of sporting or other events available on its market in Nevada, is a
12 person directly or indirectly receiving compensation or a percentage or share of the money
13 played for accepting or facilitating wagers on the results of sporting events and other events
14 without a gaming license. As a result, it has violated, and continues to violate, NRS
15 465.086.

16 **G. POLYMARKET's market violates NRS 465.092.**

17 53. Pursuant to NRS 465.092, it is unlawful for a person to knowingly accept a
18 wager from a person inside of Nevada through a medium of communication unless the
19 person accepting the wager is licensed pursuant to Nevada law and otherwise complies
20 with applicable Nevada laws and regulations concerning wagering.

21 54. POLYMARKET's market accepts wagers on sporting events and other events.

22 55. POLYMARKET's market accepts wagers from persons inside of Nevada.

23 56. The Internet is a medium of communication. NRS 465.091.

24 57. POLYMARKET's market uses the Internet for wagering activities.

25 58. POLYMARKET is not and has never been licensed to accept wagers in
26 Nevada.

27 59. POLYMARKET, in making event-based contracts concerning the outcomes,
28 or partial outcomes, of sporting or other events available on its market in Nevada without

1 a license to accept such wagers, is a person knowingly accepting wagers from persons inside
2 of Nevada through a medium of communication and has violated, and continues to violate,
3 NRS 465.092.

4 **FIRST CLAIM FOR RELIEF**

5 **(Declaratory and Injunctive Relief - NRS 463.343 and 463.346)**

6 60. The BOARD repeats, realleges, and incorporates each and every paragraph
7 contained in the General Allegations above as though fully set forth herein.

8 61. Pursuant to NRS 463.343, the BOARD may bring an action for declaratory
9 judgment in this Court to obtain “a judicial determination of any question of construction
10 or validity arising under” NRS chapter 463. NRS 463.343(1).

11 62. Pursuant to NRS 463.346, the BOARD may institute a civil action in this
12 Court “to restrain a violation” of NRS chapters 463 and 465. NRS 463.346(1).

13 63. The Court “shall give priority over other civil actions to an action brought
14 pursuant to” NRS 463.346. NRS 463.345.

15 64. A justiciable controversy exists as to the application of NRS 463.160 and
16 463.350 to the activities of POLYMARKET as they relate to the State of Nevada.

17 65. The BOARD’s and POLYMARKET’s interests are adverse.

18 66. The BOARD has a strong legal interest in this controversy as it directly
19 impacts the BOARD’s ability to carry out its legislative charge to strictly regulate gaming
20 because it is vitally important to Nevada, its economy, and the general welfare of its
21 inhabitants.

22 67. The issue involved in this controversy is ripe for judicial determination.

23 68. The Court is required to construe all statutes at issue in this claim for relief
24 in a manner consistent with the declared public policy of Nevada. NRS 463.343(3).

25 69. The BOARD is entitled to a declaration from this Court that NRS 463.160
26 prohibits POLYMARKET from making event-based contracts concerning the outcomes, or

27 ...

1 partial outcomes, of sporting or other events available on its market in Nevada without
2 obtaining the required gaming licenses.

3 70. The BOARD is entitled to a declaration from this Court that NRS 463.350
4 prohibits POLYMARKET from making event-based contracts concerning the outcomes, or
5 partial outcomes, of sporting or other events available on its market to persons under the
6 age of 21 in Nevada.

7 71. The BOARD is entitled to an injunction enjoining POLYMARKET from
8 making event-based contracts concerning the outcomes, or partial outcomes, of sporting or
9 other events available on its market in Nevada unless and until POLYMARKET obtains
10 the appropriate gaming licenses.

11 72. The BOARD is entitled to an injunction enjoining POLYMARKET from
12 making event-based contracts concerning the outcomes, or partial outcomes, of sporting or
13 other events available on its market to persons under the age of 21 in Nevada.

14 SECOND CLAIM FOR RELIEF

15 **(Declaratory and Injunctive Relief - NRS 30.030)**

16 73. The BOARD repeats, realleges, and incorporates each and every paragraph
17 contained in the General Allegations above as though fully set forth herein.

18 74. Pursuant to NRS 30.030, this Court has the “power to declare rights, status
19 and other legal relations whether or not further relief is or could be claimed.” NRS 30.030.
20 The declaration “may be either affirmative or negative in form and effect” and “shall have
21 the force and effect of a final judgment or decree.” *Id.*

22 75. A justiciable controversy exists as to the application of NRS 465.086 and
23 465.092 to the activities of POLYMARKET as they relate to Nevada.

24 76. The BOARD’s and POLYMARKET’s interests are adverse.

25 77. The BOARD has a strong legal interest in this controversy as it directly
26 impacts the BOARD’s ability to carry out its legislative charge to strictly regulate

27 ...

1 gaming because it is vitally important to Nevada, its economy, and the general welfare of
2 its inhabitants.

3 78. The issue involved in this controversy is ripe for judicial determination.

4 79. The BOARD is entitled to a declaration from this Court that NRS 465.086 and
5 465.092 prohibit POLYMARKET from making event-based contracts concerning the
6 outcomes, or partial outcomes, of sporting or other events available on its market in Nevada
7 without obtaining the required gaming licenses.

8 80. The BOARD is entitled to an injunction enjoining POLYMARKET from
9 making event-based contracts concerning the outcomes, or partial outcomes, of sporting or
10 other events available on its market in Nevada unless and until POLYMARKET obtains
11 the appropriate gaming licenses.

12 **PRAYER FOR RELIEF**

13 WHEREFORE, the BOARD prays for judgment against POLYMARKET as follows:

14 1. For a declaration that NRS 463.160, 465.086, and 465.092 prohibit
15 POLYMARKET from making event-based contracts concerning the outcomes, or partial
16 outcomes, of sporting or other events available on its market in Nevada without obtaining
17 the required gaming licenses;

18 2. For a declaration that NRS 463.350 prohibits POLYMARKET from making
19 event-based contracts concerning the outcomes, or partial outcomes, of sporting or other
20 events available on its market to persons under the age of 21 in Nevada;

21 3. For an injunction enjoining POLYMARKET from making event-based
22 contracts concerning the outcomes, or partial outcomes, of sporting or other events
23 available on its market in Nevada unless and until POLYMARKET obtains the appropriate
24 gaming licenses;

25 4. For an injunction enjoining POLYMARKET from making event-based
26 contracts concerning the outcomes, or partial outcomes, of sporting or other events
27 available on its market to persons under the age of 21 in Nevada;

28 ...

1 **CERTIFICATE OF SERVICE**

2 I certify that I am an employee of the Office of the Attorney General, State of Nevada,
3 and that on January 16, 2026, I deposited for mailing in the United States Mail, first-class
4 postage prepaid, at Carson City, Nevada, a true and correct copy of the COMPLAINT for
5 permanent injunction and declaratory relief to the following:

6 BLOCKRATIZE, INC. d/b/a POLYMARKET
7 c/o CORPORATION SERVICE COMPANY
8 251 LITTLE FALLS DRIVE
9 WILMINGTON, DE 19808

10 QCX LLC d/b/a POLYMARKET US
11 c/o CORPORATION SERVICE COMPANY
12 251 LITTLE FALLS DRIVE
13 WILMINGTON, DE 19808

14 ADVENTURE ONE QSS, INC. d/b/a POLYMARKET
15 1280 LEXINGTON AVE
16 NEW YORK, NY 10028

17 

18

19 Mercedita Garcia
20 AG Legal Secretary