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11 **FIRST JUDICIAL DISTRICT COURT OF NEVADA**

12 **CARSON CITY**

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

15 Plaintiff,

16 vs.

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

19 Defendants.

Case No. 26 0C 00012 1B

HEARING REQUESTED

20 **ERRATA TO PLAINTIFF'S APPLICATION FOR TEMPORARY RESTRAINING**
21 **ORDER AND MOTION FOR PRELIMINARY INJUNCTION**

22 Plaintiff, STATE OF NEVADA, *ex rel.* NEVADA GAMING CONTROL BOARD, by
23 and through its attorneys, hereby files this Errata to Plaintiffs' Complaint against
24 BLOCKRATIZE, INC. d/b/a POLYMARKET; QCX LLC d/b/a POLYMARKET US;
25 ADVENTURE ONE QSS, INC. d/b/a POLYMARKET.

26 This Errata comprises two updates to the previously filed Motion for Temporary
27 Restraining Order: a Declaration from Chief Deputy Attorney General Jessica E. Whelan,
28 and a proposed Temporary Restraining Order. Due to the expedited nature of these

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2026 JAN 21 PM 3: 35

WILLIAM SCOTT HOEN
CLERK

BY  DEPUTY

1 proceedings, these attachments were inadvertently excluded from the filing of the initial
2 motion. These attachments do not expand the scope of relief Plaintiffs seek in any way.
3 Plaintiffs hereby request that the Court consider the attached documents in its
4 consideration of the Complaint and Motion.

5 Dated: January 21, 2026.

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1 basketball games, college and professional football games, and elections. *Id.* Although
2 POLYMARKET's website states that POLYMARKET is "not available to . . . persons
3 located in the United States," users in Nevada are able to access POLYMARKET by signing
4 up for an account through its mobile app. *Id.* ¶ 18.

5 POLYMARKET's activities meet the definition of a "game" subject to regulation in
6 Nevada—specifically, it operates a "sports pool" under Nevada law. *See* Compl. ¶¶ 18-23.
7 But despite conducting gaming accessible in the State of Nevada, POLYMARKET is not
8 licensed in Nevada and does not comply with Nevada gaming law. *Id.* ¶ 25. It has not
9 undergone Nevada's rigorous licensing process for its gaming activities, nor has does it
10 comply with the restrictions and requirements of Nevada law for operators of sports pools.
11 *See id.* ¶¶ 26, 35.

12 Because POLYMARKET is an unlicensed entity, the BOARD does not have contact
13 information to provide POLYMARKET notice of this application.

14 An *ex parte* temporary restraining order is appropriate because POLYMARKET's
15 activities in Nevada are causing immediate and irreparable injury to Plaintiff and the State
16 of Nevada, and will continue to do so before POLYMARKET can be heard in opposition to
17 Plaintiff's application.

18 The BOARD enforces Nevada gaming law and oversees the State's gaming industry
19 to protect the integrity and reputation of gaming in Nevada and to safeguard the public.
20 POLYMARKET's failure to comply with Nevada gaming law harms the public. For
21 example, Nevada law prohibit persons under the age 21 from engaging in gaming, yet
22 POLYMARKET allows those as young as 18 to wager on its platform. Nevada law also
23 prohibits wagers by owners, coaches, players, officials, or other participants in sporting
24 events and require licensees to take reasonable steps to prevent circumvention of that rule.
25 To the undersigned counsel's knowledge, POLYMARKET does not comply with these
26 requirements.

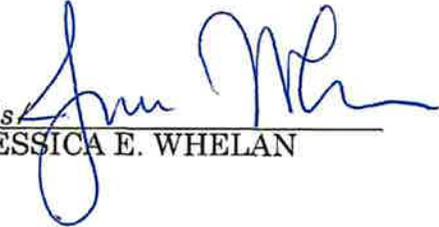
27 POLYMARKET's failure to comply with Nevada gaming law also gives it a massive
28 and unfair competitive advantage over its competitors, which upends the gaming industry.

1 That advantage is both pecuniary, in that POLYMARKET does not need to spend the
2 money its competitors need to spend on licensing fees, taxes, and compliance (including
3 maintaining a physical location in Nevada), as well as strategic, in that POLYMARKET's
4 products are not subject to the same requirements as its competitors. The BOARD suffers
5 irreparable harm when POLYMARKET is able to distort the playing field and disrupt the
6 industry in this manner.

7 The harm only increases the longer POLYMARKET is allowed to operate unfettered.
8 POLYMARKET's ability to profit from unlicensed gaming will incentivize others to enter
9 into prediction markets rather than becoming (or remaining) licensed by the State.

10 Plaintiff and the State of Nevada are currently suffering the serious, ongoing, and
11 irreparable harms outlined above every day that POLYMARKET operates its market in
12 violation of Nevada law. These harms justify issuance of the temporary restraining order
13 on an *ex parte* basis without notice to POLYMARKET or an opportunity for it to respond.

14 Dated this 20th day of January, 2026.

15
16 By: 
17 JESSICA E. WHELAN
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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 21, 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 foregoing
5 to the following:

6 Jacob T. Spencer, Esq.
7 Gibson. Dunn & Crutcher, LLP
8 1700 M. Street, N.W.
9 Washington, D.C. 20036-4504

10 *Attorneys for Blockratize, Inc. d/b/a*
Polymarket; QCX LLC d/b/a Polymarket
US; Adventure One QSS, Inc. d/b/a
Polymarket

11 

12 _____
13 An employee of the Office of the
14 Nevada Attorney General