



June 6, 2025

**VIA FEDERAL EXPRESS**

Board of Directors  
Wisconsin Amusement & Music Operators, Inc.  
717 Atlas Avenue  
Madison, Wisconsin 53714

Re: Sale and Operation of Counterfeit Electronic Gaming Devices in Wisconsin

Dear WAMO Board Members:

Light & Wonder, Inc. ("LNW") is a global leader in the design, development, sales and leasing of electronic gaming devices (e.g., slot machines). It has recently come to LNW's attention that there several suppliers providing counterfeit electronic gaming devices to locations in Wisconsin that utilize counterfeit versions of LNW's games. The copying, trafficking in, selling, leasing, operating and possessing the unauthorized LNW games and cabinets constitutes violations of state and federal laws, including trademark infringement, trademark dilution, copyright infringement, counterfeiting, passing off, unfair competition and related causes of action. These actions are causing great harm to LNW and its authorized customers and their respective consumers, including reputational damage and lost profits.

LNW takes seriously the counterfeiting of its games and the theft of its intellectual property ("IP"). LNW is sending this letter to put WAMO and its members and their suppliers and operators on notice of LNW's rights and that LNW is and will continue to enforce its IP rights aggressively. LNW will consider every seller and owner / operator of a counterfeit LNW game as an intentional and willful infringer and will take all necessary actions against these parties to enforce its rights – including filing federal lawsuits asserting claims for copyright infringement, trademark counterfeiting, trademark infringement, unfair competition and false designation of origin and common law trademark infringement and unfair competition against suppliers, purchasers or operators of counterfeit games. These activities by the suppliers and operators may also violate criminal statutes.

LNW requests that the WAMO Board gets this message out to its members and, by extension, to their customers and operators. LNW will treat anyone selling, leasing, distributing, operating, and possessing counterfeit LNW games as violating LNW's rights and IP – including WAMO's members and their customers / operators. Under applicable law, including the Lanham Act (15 U.S.C. §§ 1051 *et seq.*), LNW may be entitled to various remedies, including:

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- The award of statutory or actual monetary damages;
- Disgorgement of the infringer's profits;
- The seizure and destruction of counterfeit goods;
- The tripling of the IP owner's damages for the infringer's willful infringement; and
- Recovery of attorney fees and costs.

In fact, if a court finds that the use of the counterfeit mark is willful, it may award up to \$2,000,000.00 per counterfeit mark – and WAMO and its members, suppliers and operators are on clear notice that any use of a counterfeit LNW game is willful.

Similarly, for copyright infringement, the US Copyright Act (17 U.S.C. §§ 501 *et seq.*) provides for, among other remedies:

- The award of actual monetary damages / the infringer's profits;
- Statutory damages of up to \$150,000 per infringement;
- The impoundment and destruction of infringing devices; and
- The award costs and attorneys' fees.

Please feel free to contact us with any questions regarding the contents of this letter. This letter is written without prejudice to Light & Wonder, Inc.'s rights and remedies, all of which are expressly reserved.

Very truly yours,

Light & Wonder, Inc.



Senior Vice Present & Deputy General Counsel

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WONDER** TM