



June 6, 2025

VIA FEDERAL EXPRESS

Board of Directors
Tavern League of Wisconsin
11801 W. Silver Spring Dr #200
Milwaukee, WI 53225

Mark Jefferson
Executive Director
Tavern League of Wisconsin

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

Dear Tavern League Board Members & Mr. Jefferson:

Enclosed is a copy of a letter that Light & Wonder, Inc. ("LNW") recently sent to the to the Wisconsin Amusement & Music Operators ("WAMO") Board of Directors.

As stated in the attached letter, LNW has recently become aware that there several suppliers providing counterfeit electronic gaming devices to locations in Wisconsin that utilize counterfeit versions of LNW's games. These games are present and available for play at many of your organizations taverns and restaurants and the majority of the operators that place these games are members of WAMO.

LNW takes the issue of counterfeiting very seriously. 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.

This letter, and the enclosed letter to WAMO, services to put the members of the Tavern League and WAMO 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.

Light & Wonder

6601 Bermuda Rd., Las Vegas, NV 89119 | 702-897-7150 | LnW.com

LNW requests that the Tavern League Board gets this message out to its members. Although your members in many cases do not own the electronic gaming devices in their locations, they could still be liable under federal law for the placement and operation of counterfeit devices in their establishments. Therefore, we strongly recommend that your members speak with the operators servicing their location and obtain that operator's explicit assurance that the electronic gaming devices they provide are genuine – and any game operating LNW owned content is most likely not a genuine game. We thank you in advance for disseminating this message to your entire membership. We do not want to see the tavern and restaurant owners of Wisconsin dragged into legal jeopardy.

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.

A handwritten signature in black ink, appearing to read "Jeffrey Michel". The signature is written in a cursive, flowing style.

Senior Vice President & Deputy General Counsel

**LIGHT &
WONDER**™



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:

Light & Wonder

6601 Bermuda Rd., Las Vegas, NV 89119 | 702-897-7150 | LnW.com

- 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 President & Deputy General Counsel

**LIGHT &
WONDER**™