Understanding Involuntary Illegal Online Gamblers in the U.S.: Framing in Misleading Information by Online Casino Reviews

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Abstract

Although there are many illegal online gamblers in the United States who use offshore gambling sites while falsely believing that their activity is legitimate, few studies have focused on the role of online casino reviews (OCR) who facilitate this activity. These reviews, for a variety of reasons, may present misleading information designed to encourage U.S. players to use offshore gambling sites. Using framing theory and neutralization techniques, we conducted a content analysis of multiple OCR to examine how they present information and justifications regarding the use of offshore gambling sites in the U.S. The findings indicate that many OCR positively promoted offshore sites, presenting various frames in which legal issues and information were interpreted in ways that neutralize and encourage the use of offshore sites in the U.S. This study suggests multiple preventive measures to facilitate effective online gambling regulation.

Keywords:Illegal online gambling; offshore gambling; online casino reviews; framing theory; neutralization technique

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Introduction

Although the recent relaxation of gambling prohibitions has led to a rising number of states providing legal online gambling venues (*Murphy v. National Collegiate Athletic Association*, 2018), illegal online gambling sites are still deeply entrenched in the United States, continuing to benefit from U.S. players. For example, the American Gaming Association (AGA) reported in 2019 that Americans places approximately $150 billion worth of wagers to illegal sports betting sites annually (p. 7). Also, its survey in 2020 shows that the number of American players placing bets on offshore online sports betting operations increased by 24% in states where no legal online gambling venue was available and even by 3% in legal states from the previous year (AGA, 2020).

In the present study, illegal online gambling sites in the U.S. are defined as ones that do not have a valid license issued by state gambling authorities in the U.S. but can be accessible from the U.S., regardless of their base and legitimacy in other jurisdictions (Gainsbury et al., 2018). Most of these sites are known as offshore gambling sites that operate outside of the U.S. These sites mostly have licenses issued by local gambling authorities in the jurisdictions where their servers are located; however, it is known that they tend to accept bets from players in regions where their licenses and advertising rights are not valid (Gainsbury, Abarbanel, & Blaszczynski, 2019; Schmidt-Kessen, Hörnle, & Littler, 2019).

The entrenchment of offshore gambling sites in the U.S. is a serious threat that compromises the value of domestic, legal, taxpaying gaming markets; harms the local economy; and poses a potential risk to players. Competition from offshore gambling sites may encroach on legal gambling markets. Offshore sites who evade regulatory compliance costs altogether often offer more attractive odds, betting options, payout rates, and promotions than their legal counterparts, which causes a loss in gaming revenue of the legal operators and tax revenue to the state (Gainsbury, 2012; Gainsbury, Abarbanel, & Blaszczynski, 2019; Gainsbury, Parke, & Suhonen, 2013). Bypassing the strict restrictions of U.S. jurisdictions, offshore gambling sites may not abide by regulatory requirements designed to protect players from negative consequences of online gambling, especially as it relates to problem gambling (Gainsbury, Parke, & Suhonen, 2013). In fact, multiple studies reported that users using illegal online gambling sites tend to have greater gambling disorder severity and gambling-related harms than ones using legal sites (Costes et al., 2016; Gainsbury, Abarbanel, & Blaszczynski, 2019). Banks (2017) reported that some offshore gambling sites are less likely to offer rigorous consumer protection or followed formalized dispute resolution procedures, which increases the risk of consumer victimization. Although players are victimized by malicious operators, they often have little choice but to become 'helpless', as they are reluctant to take a legal action because of their illegal online gambling activities (Gainsbury & Wood, 2011).

Despite the negative impacts of offshore sites to the U.S., regulatory and investigatory efforts toward them have not been effective. Their international locations — mostly Caribbean countries whose cooperation with authorities and law enforcement agencies in other jurisdictions is rare — discourage investigating and prosecuting offshore operators (Gainsbury, 2012; Schmidt-Kessen, Hornle, & Littler, 2019). Also, many law enforcement agencies tend to lack the ability and resources for effective cybercrime investigation, and their cybercrime investigation techniques often fall behind criminals' evolving technologies (Choi, 2015). Illegal operators make it difficult to collect evidence from cyberspace by hiding their servers and identities with various schemes — such as proxy sites, domain proxy services, webhosting companies, and multiple relay servers placed in different jurisdictions (Choi et al., 2020). They also have employed various unconventional deposit and withdraw methods — such as money order, prepaid cards, and cryptocurrency — to circumvent the federal law targeting banks and credit card processing firms to restrict money transfers to offshore business (i.e., Unlawful Internet Gambling Enforcement Act of 2006; Choi et al., 2020; Gainsbury & Blaszczynski, 2017; Millar, 2018).

Although illegal online gambling activities are seemingly deliberate at first glance, it is important to note that some use of illegal sites may be unintentional. Some players

who misunderstand gambling laws may unknowingly use offshore gambling sites. AGA's survey of American sports betting players in 2020 shows that 55% of participants using offshore sites believed that they were using legitimate sites; 85% of those unintentional offshore players were surprised that they were actually using illegal sites; and 48% of the illegal players would shift away from illegal sites after learning their behavior is illegal (AGA, 2020). The findings indicate that offshore sites are benefitting from players' confusion over their legal status.

Absent of enforcement against unregulated operators, it is a player's responsibility to verify whether using an online gambling site is lawful in their jurisdiction in which they live. However, it is not an easy task for players to check the laws themselves because the statutes are complex and full of legal jargon. The U.S. is a clear example showing that a single country can have multiple, complex gambling laws. In addition to federal laws (that are difficult to interpret and thus to assess the legitimacy of online gambling activity), each state has their own gambling laws. For example, while some states made legal online gambling sites available for anyone within their borders, others still completely ban online gambling; one game is legal for interstate online gambling, while others are not; and while one game is available for both desktop and mobile in some states, the same game is only allowed for mobile online gambling in other states (AGA, 2020).

Therefore, many players tend to rely on online resources, such as online gambling reviews, to glean information regarding their regional gambling laws. Online casino (gambling) reviews (hereafter OCR) are websites that offer not only reviews of gambling websites' quality but also a wide range of information regarding online gambling (Griffiths, 2020; Lopez-Gonzalez & Tulloch, 2015). Importantly, OCR do not offer opportunities to gamble themselves; but they simply inform players about where they might find betting opportunities online, playing a substantial role in reducing the distance between players and online gambling sites (Griffiths, 2020). OCR also provide interpretations of regional online gambling laws to help players make an informed decision before placing a bet online.

Importantly, however, players' perceptions about the legality and legitimacy of online gambling can be affected by how OCR interpret the statutes and present the information. Given the presence of gambling affiliate programs in which OCR get paid by online gambling sites for promoting their products and services (Lopez-Gonzalez, & Tulloch, 2015), OCR may be prone to offer biased and misleading information regarding gambling laws to encourage players to use those offshore gambling sites with which these OCR are affiliated. Naive players might be vulnerable to misinformation and could make a wrong decision to place bets on offshore gambling sites while believing their activity is legitimate. In this context, these players are involuntary law breakers while unknowingly falling victim to gambling misinformation provided by OCR.

While it is important to comprehensively understand the crime-generating context of illegal online gambling activities in devising a proper and effective preventive measure, previous gambling studies have paid little attention on the role of OCR in influencing players' decisions to place bets on offshore gambling sites. Therefore, the goal of this study is to examine how OCR present information about offshore gambling sites. Specifically, this study asks: **How do OCR present information about the use of offshore gambling sites?**

This research question explores the frames that OCR employ to encourage or discourage the use of online gambling sites in the U.S. In other words, examining this research question involves 1) capturing the overall tone of OCR toward offshore sites and the legality of gambling sites, 2) identifying what kind of words OCR use to describe online gambling sites, and 3) examining what kind of frames or neutralizations OCR employ to justify the use of offshore gambling sites in the U.S. Framing theory and techniques of neutralization were used in this study to guide a content analysis of framing effects generated through OCR in the process of presenting information of promoted gambling sites.

Framing Theory

Framing theory has been a leading theoretical framework not only in communication studies but also in other disciplines, ranging from psychology, behavioral economics, political science, sociology to criminology and criminal justice (Cacciatore, Scheufele, & Iyengar, 2016; DeVore, Choi, Li, & Lu, 2021; Harris & Gruenewald, 2020; Kort-Butler & Habecker, 2018). The disciplinary origins of the theory are divided into sociological and psychological roots. Sociological approaches to framing are based on the assumption that individuals tend to rely on causal attribution or their primary frameworks to process complex information, while psychological framing assumes that individual perceptions toward information are likely to draw on certain frames of reference (Tewksbury & Scheufele, 2009).

Framing refers to "select[ing] some aspects of a perceived reality and mak[ing] them more salient in a communicating text (…) to promote a particular problem definition, causal interpretation, moral evaluation, and/or treatment recommendation" (Entman, 1993, p. 53). Framing is the way that people select and organize information to make stories that make sense to audiences. According to the theory, any issue can be viewed and construed from various perspectives. Chong and Druckman (2007) asserted that an author emphasizes certain issues and presents them through a particular perspective to encourage/discourage certain interpretations and reorient how people see reality. In this manner, frames have an influence on people's beliefs, attitudes, and behaviors (Tewksbury & Scheufele, 2009). Effective framing structures an issue in a specific way that develops an intended conceptualization of the issue (Chong & Druckman, 2007).

Frames, which are preconceived ideas that provide meaning and interpretation to events associated with an issue, allow people to perceive, identify and react to the events by helping them readily and quickly process new information (Chong & Druckman, 2007). Frames are associated with a culture; every word of certain language evokes a frame. In addition, people process information through their own frames, instead of choosing frames offered by others for their interpretation, and tend to fit new information into them. If readers' frames contradict an author's frame, information from the original author is normally excluded from the reader's perception as an exception or is distorted to fit their own frames (Tewksbury & Scheufele, 2009). Here, this theory can explain how gamblers become victims.

Player as an Involuntary Illegal Online Gambler

Framing can stimulate public opinion and attitudes toward an issue by emphasizing certain aspects of the issue and eliminating the others; this phenomenon is called "framing effects" (Chong & Druckman, 2007). When an issue is restructured into a news story, for example, framing effects result in the story's final portrayal — and ultimately have a substantial influence on the interpretation of the issue by the audience. Authors engage in this reconstruction process when they determine how to present information associated with an issue. They select images and words that have an impact on how readers understand and react to the issue (Chong & Druckman, 2007). In addition, they are also affected by many factors, such as social norms, pressure from interest groups, and personal desires. Thus, certain opinions, recommendations, and evaluations are delivered to audiences while others are not — these choices limit how audiences interpret the issue (Tewksbury & Scheufele, 2009).

When frame theory is applied to illegal online gambling, OCR under affiliate programs may consider their "money-making business" when deciding how to present information about offshore gambling sites they are promoting (Brozio, 2018; Sutevski, n.d.). The frames employed by OCR could limit how audiences perceive offshore gambling sites and gamblers' decisions to use specific sites. If OCR use encouraging opinions and evaluations of offshore gambling sites, readers are more likely to find the sites favorable (Sutevski,

n.d.). Therefore, it is hypothesized that OCR promoting offshores sites tend to present information with a positive tone toward the use of offshore sites.

In addition, authors suggesting a certain frame to audiences tend to use culturally original words that can connect to existing frames (Tewksbury & Scheufele, 2009). For example, some OCR promote certain offshore gambling sites as 'US-friendly gambling sites'. The frame evoked by the word 'friendly' conjures up images of 'a warm smile', 'a kind friend', or 'a person behaving pleasantly'. Using this frame would allow authors and audiences to have a shared reference about the images of the word (Tewksbury & Scheufele, 2009). Rather than invoking negative images of illegal online gambling sites, the sites associated with this frame would be seen as the ones that are truthful, legitimate, and favorable to their customers. As a result, online gamblers who are new to offshore gambling sites are likely to be misinformed and therefore deluded into using the sites, unknowingly making themselves illegal online gamblers. Therefore, it is hypothesized that OCR promoting offshores sites tend to use words that give positive images of offshore sites when describing them.

Neutralization Techniques. Ultimately, this study surmises that OCR affiliated with offshore sites are less likely to accurately present information about the illegality of using offshore sites in the U.S. as it is. To profit from their affiliations, they might instead provide false legal information about gambling to mislead players into using offshore sites (see Brozio, 2018). Also, although there is no research to our knowledge on this, it might be that OCR present a certain interpretation of online gambling regulations via a framing process that neutralizes illegal online gambling behavior by providing justifications or excuses for the deviant behaviors. The framing process, coupled with neutralization techniques, might retain current offshore players as well as encourage potential players to place a bet on offshore sites.

Neutralization techniques are justifications given before deviant acts. Sykes and Matza (1957) have suggested that offenders employ neutralization techniques prior to violating laws and norms they believe in to neutralize their behaviors, self-blame, resulting guilt, and shames. These norm-violators pre-emptively use linguistic devices to convince themselves in advance that their deviant behavior is acceptable in their particular situation, which allows them to be freed to engage in the deviant acts while protecting their self-esteem and neutralizing self-blame.

Sykes and Matza in 1957 originally proposed five techniques of neutralization to predict and explain juvenile delinquency. Since then, numerous studies have proposed various types of neutralization techniques — such as Ashforth and Anand (2003), Bandura et al. (1996), Banerjee, Hay, and Greene (2012), Barriga and Gibbs (1996), Benoit and Hanczor (1994), Gellerman (2003), Geva (2006), Goffman (2009), Klochars (1974), Murphy and Dacin (2011), Robinson and Kraatz (1998), Schlenker (1980), Scott and Lyman (1968), and Shigihara (2013) — although many techniques often overlap, causing arbitrariness and inconsistency of research findings relates to neutralizations (Maruna & Copes, 2005). While some scholars attempted to address the inconsistency issue by proposing an integrative model of neutralization techniques consisting of 60 techniques (Kaptein & Van Helvoort, 2019), others placed more emphasis on understanding how neutralizations work than identifying, listing, or modeling them (Maruna & Copes, 2005).

Among a wide range of neutralization techniques, the techniques proposed by Sykes and Matza (1957) — known as the Famous Five — are the ones that have been widely used in many of the studies on neutralizations: denial of responsibility, when people shift the responsibility of their deviant act to outside forces beyond their control (e.g., "I did not know it was illegal because it was introduced as legitimate."); denial of injury, when people claim that their deviant behavior does not cause any great harm or damage (e.g., "Using offshore gambling sites does not break any laws."); denial of the victim, when people claim that the victim deserves punishment or retaliation (e.g., "Fees charged by legal online gambling sites are too high, therefore it is better to use offshore sites."); condemnation of the condemners, when people justify their deviant behavior as the world is already corrupt, shifting

the blame from them to the system (e.g., "No legal action has been taken for gambling on-line."); and appeal to higher loyalties, when people claim that their deviant behavior is out of loyalty to their social group or some ideas or beliefs which are deemed to be more important than the law (e.g., "Players have right to enjoy online casino games in any online gambling sites as long as they accept US players."). Scholars have applied neutralization techniques to various types of crime and deviance, including theft (Dabney, 1995; Shigihara, 2013), abortion (Breenan, 1974), unethical behavior of employees (Vitell & Grove, 1987), corporate crime (Piquero, Tibbetts, & Blankenship, 2005), auto theft (Copes, 2003), deer poaching (Eliason & Dodder, 1999), illegal copying of commercial software (Hinduja, 2007), and digital piracy (Moore & McMullan, 2009). Therefore, it is hypothesized that OCR promoting offshore sites tend to present justifications that neutralize the use of offshore sites.

Methods

Content analysis is a research method that interprets, codes, and evaluates textual material to make inferences about the messages from the texts (Stemler, 2000). Using content analysis, researchers can quantify qualitative data to identify patterns or analyze the relationships of certain concepts (Berelson, 1952). Therefore, content analysis is a proper tool for this study, as frames or themes about offshore gambling sites need to be derived from articles and information offered by OCR that provide information about U.S. online gambling.

Sample and Measures

Given that probability sampling is not feasible in collecting websites (Schafer, 2002), this study employed a purposive sampling technique to collect a sample of OCR via a Google search engine with the combination of keywords, such as the U.S. (US, USA, or American), online, gambling (casino, sports bet, sportsbook, sports betting, poker, or race), and reviews (see Appendix A). The researcher manually examined the result of each search keyword from June 4 to 9 in 2021 and selected OCR that were accessible from Nevada, U.S.A. and either provided information about U.S. online gambling or promoted an online gambling site in English since our targets are OCR whose target audience are U.S. players. As a result, a purposive sample of 102 OCR were collected and examined for further analysis (see Appendix B).

Each OCR was inspected to examine the framing of offshore gambling. The researcher collected data on the legality of the gambling sites included in the OCR (*Legality*), the total number of offshore sites reviewed by the OCR (*Number*), the overall tone of toward offshore sites used by the OCR (*Tone*), the types of words used to describe offshore sites (*Words*), and the types of neutralizations/frames used to justify the use of offshore sites (*Justification*), according to the data collection sheet (see Appendix C).

This study took multiple approaches to collect and code data: both latent content analysis (in which the researcher interpreted the content and tones of the material; Downe-Wamboldt, 1992) and inductive content analysis (in which themes are drawn from repeated examination of the data; Kyngäs, 2020) were employed due to the dearth of previous studies examining OCR. The legality of gambling sites being reviewed variable is categorized as (0) No reviewed site, (1) Legal, (2) Offshore, (3) Legal and offshore, (4) Legal and social casino[1], and (5) Offshore and social casino. When OCR promoted only a social casino, it was coded as "(0) No reviewed site". When a site *exclusively* promoted online gambling sites that were legal in one of the jurisdictions in the U.S., it was coded as "(1) Legal". When a site *exclusively* promoted online gambling sites that were not legal in any of the jurisdictions in the U.S., it was coded as "(2) Offshore". Surveying this variable may show

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[1]A social casino provides free-to-play gambling-themed games (not gambling products) and does not involve real money prizes.

a comprehensive picture of the legitimacy of online gambling sites that were currently promoted by OCR.

For *Number*, the number of offshore sites that were introduced by an OCR was counted. The tone toward offshore gambling sites is measured as either positive (1), neutral (2), or negative (3). When the researcher was not able to identify the overall tone due to a lack of mentioning offshore gambling sites, it was coded as (0). This variable may represent overall attitudes of OCR toward offshore sites.

For *Words*, the researcher captured the words describing the use of online gambling sites, counted how many OCR used each word, and then combined similar words into broader themes (Downe-Wamboldt, 1992). This variable is categorized into 16 words, including Best, Top, Safe, Top-rated, and Legal (see Table 4 for a complete list of categories). As authors employ certain words to evoke their intended frames (Tewksbury & Scheufele, 2009), surveying this variable may show a picture of how OCR want U.S. players to see offshore sites.

To code *Justifications*, the researcher started by collecting statements that seemed to justify the use of offshore sites in the U.S. and then used a deductive approach by classifying the justifications according to the famous five techniques (Sykes & Matza, 1957) in order to connect the justifications to the essential categories of neutralizations techniques. When there were some justifications that do not fit into any of the five categories, the researcher devised new categories that can encompass the remaining justifications, based on the common characteristics of them. As a result, *Justifications* is categorized as (0) Cannot be identified; (1) Denial of responsibility, when OCR shift the responsibility of using offshore sites to others; (2) Denial of injury, when OCR argue that offshore gambling does not cause any great harm; (3) Condemnation of condemners, when OCR shift the blame of using offshore sites to gambling laws and regulations; (4) Appeal to higher loyalties, when offshore gambling is justified for the greater good; (5) Legal and legitimate, when OCR claim that offshore gambling is legitimate in the U.S.; and (6) Others. Surveying this variable may show how OCR convince U.S. players that offshore gambling is acceptable in the U.S. [2]

Cross-tabulation was used as a main analytical tool, which compares the results for one variable with the results of another. Using this method allows for the identification of patterns, trends, and probabilities between *Legality*, *Tone*, and *Words*. It was also performed to find the relation between *Justification* and *Tone*.

Results

Table 1 presents the descriptive statistics of three variables - Number of promoted offshore sites, Legality of promoted gambling sites, and Overall tone toward offshore sites. The results show that the average number of offshore sites that the sample OCR promoted is approximately 12 (SD = 25.332), with a range from 0 to 211. The sample sites were all independent OCR and mostly provided reviews of various online gambling sites for U.S. players. An online gambling site could be promoted by multiple OCR. For Legality, most gambling sites that were promoted by the OCR were based outside the U.S. (71.6%), followed by legal (22.5%), legal and social casino (2%), and legal and offshore (1%). These figures indicate that most of the OCR introduced online gambling sites lacking a valid gambling license in the U.S. as ones for use by U.S. players. The tone toward offshore sites was mostly positive (64.7%), and only one OCR addressed offshore sites negatively (1%).

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[2]The sample OCR were reexamined from November 11 to 19 to accomplish intra-rater reliability. Intra-rater reliability is used to explain how consistent a single rater is in the same assessment repeated over multiple occasions (McHugh, 2012). For intra-rater reliability, this study used Cohen's Kappa (κ) — a metric used to measure inter/intra-rater reliability for categorical items. It was revealed that the researcher was consistent when measuring the legality of promoted gambling sites ($\kappa = 1$) and had almost perfect intra-rater agreement for the overall tone toward offshore sites ($\kappa = 0.96$), the types of words describing offshore sites ($\kappa = 0.96$), and the justifications of using offshore sites ($\kappa = 0.91$; McHughm 2012). When there were any differences of value between the two inspections, the researcher reflected the latest changes in analysis to reflect updated information of OCR to the analysis.

While some of them maintained a neutral, unbiased attitude toward offshore sites (11.8%), others did not mention anything about the use of offshore sites (22.5%).

Table 1
Descriptive Statistics (n = 102)

	Mean (SD)	Frequency (%)		Min.	Max.
Number of Offshore Sites	11.990 (25.332)			0	211
Legality of Promoted Gambling Sites		102	(100)		
No Review		3	(3)		
Legal		23	(22.5)		
Offshore		73	(71.6)		
Legal & Offshore		1	(1)		
Legal & Social Casino		2	(2)		
Offshore & Social Casino		0	(0)		
Overall Tone Toward Offshore Sites		102	(100)		
Cannot be Identified		23	(22.5)		
Positive		66	(64.7)		
Neutral		12	(11.8)		
Negative		1	(1)		

Table 2 shows the results of cross-tabulation analysis that compared Legality with Tone. The chi-square test for the cross-tabulation table is 110.196 ($p < 0.01$), indicating that the variables have a low chance of being independent. The findings indicate that the majority of OCR promoting offshore gambling sites (86.3%) addressed offshore sites positively. About 12.3% of the offshore OCR described offshore sites without bias. No offshore OCR showed a negative tone toward offshore sites. In addition, all but one of the OCR promoting legal online gambling sites (95.7%) did not mention anything about offshore sites. The one site using a negative tone toward offshore sites did not promote an online gambling site ($n = 1$).

Table 2
Cross-Tabulation for Legality of Promoted Gambling Sites and Overall Tone Toward Offshore Sites (n = 102)

Legality of Promoted Gambling Sites	**Overall Tone Toward Offshore Sites**				Total
	Cannot be identified	Positive	Neutral	Negative	
Legal	22 (95.7%)	0	1 (4.3)	0	23 (100)
Offshore	1 (1.4)	63 (86.3)	9 (12.3)	0	73 (100)
Others	0	3 (50)	2 (33.3)	1 (16.7)	6 (100)
Total	23 (22.5)	66 (64.7)	12 (11.8)	1 (1)	102 (100)

Words Describing Promoted Sites

The frequency distribution of the words describing promoted sites across the legality of promoted gambling sites is displayed in Table 3 and the overall tones toward off-

shore sites in Table 4. The results show that most words that positively describe promoted gambling sites were used by the offshore OCR or presenting gambling information with a positive tone. Given that most of the OCR promoting offshore gambling sites positively described offshore sites (86.3%; see Table 3), the findings indicate that the offshore OCR made more efforts to promote a positive image of the sites – perhaps to encourage the use of those offshore sites. Another possible explanation is that legal sites are bound to be represented in a certain tone that is not overly positive, while offshore sites are not.

Table 3

Cross-tabulation for Words Describing Promoted Sites & Legality of Promoted Gambling Sites

Words Describing Promoted Sites	*Legality* of Promoted Gambling Sites									
	No Review		Legal		Offshore		Legal & Offshore		Legal & Social Casino		Total
Best	3	(4.3%)	12	(17.1)	53	(75.7)	1	(1.4)	1	(1.4)	70 (100)
Top	1	(2.6)	5	(13.2)	31	(81.6)	0		1	(2.6)	38 (100)
Safe	0		2	(10)	17	(85)	0		1	(5)	20 (100)
Top-Rated	0		1	(5)	17	(85)	0		2	(10)	20 (100)
Legal	0		2	(13.3)	13	(86.7)	0		0		15 (100)
Trusted	1	(7.1)	2	(14.3)	10	(71.4)	1	(7.1)	0		14 (100)
Friendly	0		0		10	(100)	0		0		10 (100)
Reliable	0		1	(10)	8	(80)	0		1	(10)	10 (100)
Right	0		0		5	(83.3)	1	(16.7)	0		6 (100)
Fair	0		1	(20)	4	(80)	0		0		5 (100)
Reputable	0		0		4	(100)	0		0		4 (100)
New	0		2	(40)	3	(60)	0		0		5 (100)
Popular	0		1	(25)	3	(75)	0		0		4 (100)
Perfect	0		0		3	(100)	0		0		3 (100)
Latest	0		1	(33.3)	2	(66.7)	0		0		3 (100)
Others	0		3	(14.3)	18	(85.7)	0		0		21 (100)

Frames Justifying the Use of Offshore Gambling Sites in the U.S.

This study also examined the frames OCR employed to justify the use of offshore gambling sites in the U.S. The identified justifications were classified into the five frames; three frames based on the existing neutralization techniques (Denial of responsibility, Denial of injury, and Appeal to higher loyalties) as well as two additional frames identified during the examination (Claim of legitimacy and Other). Figure 1 presents the frequency distribution of the frames that justify using offshore gambling sites in the U.S.

The most often used frame is Claim of legitimacy (28.4%). This frame mostly emphasizes that online gambling is legal in the U.S.: "Online gambling is deemed completely legal at the federal level" ("Is Online Gambling Legal?", n.d., para. 2). While some OCR indirectly introduced offshore sites as legal ones by providing correct explanations of legality of online gambling in the U.S. with recommendation of offshore sites ("The Best USA Online Casinos in 2021", n.d.), others specifically highlighted the legitimacy of using offshore sites:

> Online casinos are legal in the USA, and you can use either domestic, regulated options or offshore casinos that serve the American market. This latter option means that players who reside within regions that have not yet legalized

Table 4

Cross-tabulation for Words Describing Promoted Sites & Overall Tone Toward Offshore Sites

Words Describing Promoted Sites	Overall *Tone* toward Offshore Sites			
	Positive	Neutral	Negative	Total
Best	52 (89.7%)	5 (8.6)	1 (1.7)	58 (100)
Top	30 (90.9)	3 (9.1)	0 (0)	33 (100)
Safe	16 (88.9)	2 (11.1)	0 (0)	18 (100)
Top-Rated	17 (89.5)	2 (10.5)	0 (0)	19 (100)
Legal	9 (69.2)	4 (30.8)	0 (0)	13 (100)
Trusted	10 (83.3)	2 (16.7)	0 (0)	12 (100)
Friendly	8 (80)	2 (20)	0 (0)	10 (100)
Reliable	5 (55.6)	4 (44.4)	0 (0)	9 (100)
Right	5 (83.3)	1 (16.7)	0 (0)	6 (100)
Fair	2 (50)	2 (50)	0 (0)	4 (100)
Reputable	3 (75)	1 (25)	0 (0)	4 (100)
New	3 (100)	0 (0)	0 (0)	3 (100)
Popular	3 (100)	0 (0)	0 (0)	3 (100)
Perfect	3 (100)	0 (0)	0 (0)	3 (100)
Latest	1 (50)	1 (50)	0 (0)	2 (100)
Others	15 (83.3)	3 (16.7)	0 (0)	18 (100)

state-based online gambling can still legally play at an offshore casino without the fear of breaking any laws ("Are Online Casinos Legal in the US?", n.d.a, para. 1).

Some OCR justified offshore gambling by claiming that no individual within the U.S. has ever been arrested for gambling online. This framing effect may suggest that penalties will not be charged to offshore players because the U.S. is where no one has been in legal trouble for playing online gambling. From the perspective of the argument to ignorance [3], this frame was also classified into the claim of legitimacy frame, as it implies a lack of evidence against legitimacy of using offshore gambling sites in the U.S.: "Almost no legal action has ever been taken against Americans simply for playing online poker" ("Are there any legal poker sites in the USA?", n.d., para. 1). This is not a groundless argument as online gambling federal regulations mostly target illegal online gambling business (see UIGEA), not players. However, going after operators could also indirectly affect players as they might lose their deposit when an online gambling site they use is shut down by investigators.

Approximately 17.6% of the OCR employed the denial of responsibility frame. This frame was mainly used to shift the responsibility of unlawful online gambling activity to the U.S. gambling laws. The U.S. gambling laws were framed as things that are too complicated to understand, which suggests that failing to observe the U.S. online gambling laws is partly a consequence of the confusing laws: "Complex federal and state laws might make it difficult to know whether online casinos are legal or not" ("Are Online Casinos Legal in the US?", n.d.b, para. 1). Several OCR viewed the U.S. gambling laws as ambiguous and unclear to legitimize the use of offshore gambling sites: "the US laws are exceptionally hazy when it comes to the subject of online gambling" ("The Laws for Online Casinos in

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[3]The main argument of this logical fallacy is that a proposition is true because it has not yet been proved to be false and vice versa (Walton, 2010).
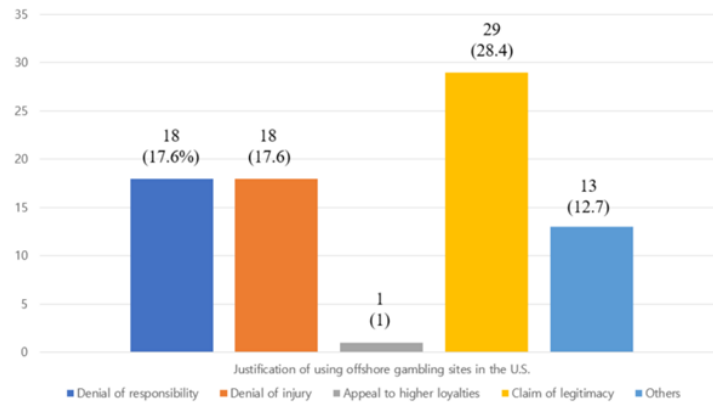
Figure 1

Frequency Distribution of the Frames Justifying the Use of Offshore Gambling Sites in the U.S.

the US", n.d., para. 2).

For the denial of injury frame, a total of 18 OCR (17.6%) promoted online casinos while emphasizing that online gambling does not break any laws mostly due to the lack of law banning US residents either from gambling online — "...the major reason behind why you are able to play freely at online casinos in the United States is the lack of law prohibiting it" ("US Online Gambling is on the Rise", n.d., para. 8) — or, specifically, from using offshore sites — "The best online betting sites for US residents are all legally licensed and regulated, operating outside of US jurisdiction. There are no federal or state laws preventing American players from accessing these sites and betting online [4]" ("USA Online Gambling Site Reviews", n.d., para. 2). Some OCR specifically indicated that only operators were subject to U.S. online gambling laws, not players: "Most gambling legislation in America is targeted at those who provide betting and gaming services, and not those who gamble" ("US Online Gambling Laws and Regulation", n.d., para. 5).

Only one OCR used the appeal to higher loyalties frame, prioritizing the offshore site's right to accept U.S. players over U.S. laws: "Offshore poker sites are not under US jurisdiction. They do, however, maintain their right to accept players from anywhere in the world, including the United States" ("Is Playing Real Money Poker Legal from My State?", n.d., para. 1).

Additionally, OCR justified the use of offshore sites in various ways, such as by emphasizing the legitimacy of using cryptocurrency — "new methods of depositing and withdrawing have been brought into effect today, such as cryptocurrencies, which allow US citizens to engage in online gambling at casinos once again" ("The Laws for Online Casinos in the US", n.d., para. 5); by highlighting the safety of an offshore site — "online casinos for USA players are safe" ("Are Online Casinos for USA Players Safe?", n.d., para. 1); or by focusing on offshore sites accepting US players — "Many online casinos allow players to play for free of wit [sic] real money, and many offer us casino bonus no deposit when signing up" ("Gambling in USA", n.d., para. 3). Neither the denial of victim nor the condemnation of the condemners frames were identified among the sample OCR.

While examining the sample OCR, one concern was that some justifications were too ambiguous and could be interpreted in multiple ways. In this case, the researcher classified them into the most relevant category, relying on the researcher's interpretation on the contents and tones (Downe-Wamboldt, 1992). For example, one OCR stated that

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[4]There is no federal law that directly prohibits American players from accessing online gambling sites without a valid license in the U.S.

"if your state doesn't have its own legit gambling websites, you can still play on those offshore, given that they accept US players" ("Gambling in USA", n.d., para. 3). It is not clear if this justification lays the responsibility of using offshore sites on the state lacking legal online gambling venues or focuses on offshore sites accepting US players. In this case, the researcher classified it into Others, as the latter interpretation deemed to be more directly expressed than the former.

Figure 2 presents the bar graph visualizing the frequency distribution of the frames justifying the use of gambling sites in the U.S. among the OCR promoting offshore gambling sites ($n = 74$). The findings show that fewer than two-fifths of the OCR used the identified frames, such as Claim of legitimacy (37.8%), Denial of responsibility (23%), Denial of injury (23%), and Others (12.2%). This indicates that most of the OCR promoting offshore sites did not necessarily address the legal issues of using offshore sites in the U.S., but simply promoted online gambling sites.
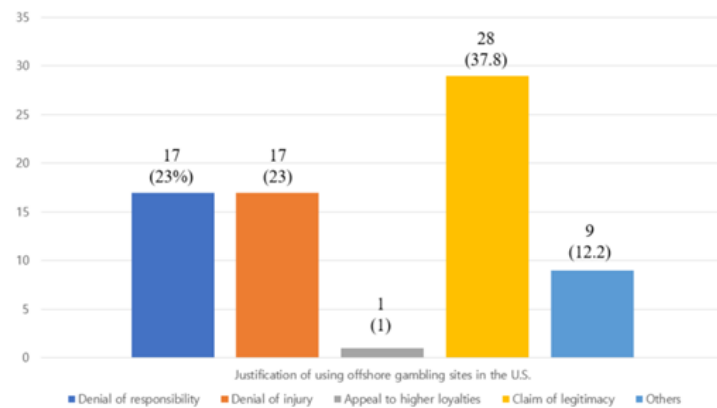
Figure 2

Frequency Distribution of the Frames Justifying the Use of Offshore Gambling Sites in the U.S. among the OCR Promoting Offshore Gambling Sites (n = 74)

Among the OCR that did not promote offshore sites, no more than two frames were identified in each category: No review (Denial of response, $n = 1$; Others, $n = 2$), Legal (Denial of injury, $n = 1$; Claim of legitimacy, $n = 1$), and Legal & social casino (Others, $n = 2$). It is notable that Legal OCR, which mostly focused on only legal online gambling sites, barely mentioned anything about the use of offshore sites in the U.S.

Table 5 shows the frequency distribution of the frames justifying the use of offshore gambling sites in the U.S. across the overall tones toward offshore sites. The results show that various frames were employed by a minority of the OCR in favor of offshore sites to justify the use of offshore sites in the U.S.: Claim of legitimacy (37.9%), Denial of injury (22.7%), Denial of responsibility (21.2%), Appeal to higher loyalties (1.5%), and Others (12.1%). In other words, the majority of offshore OCR did not address the use of offshore sites in the U.S. although their undertone is positive. In addition, some of the OCR whose overall tone toward offshore sites is somewhat neutral also used some frames for the justification, including Denial of injury (25%), Denial of responsibility (25%), Claim of legitimacy (25%), and Others (41.7%).

Discussion and Conclusion

This study focused on the role of OCR in the promotion of illegal online gambling. The goal of this study was to explore how OCR depict online gambling sites they were affiliated with and the use of offshore sites in the U.S. using a theoretical framework of framing theory and neutralization techniques. Findings of the content analysis of OCR

Table 5

Cross-tabulation for Frames Justifying the Use of Offshore Gambling Sites in the U.S. and Overall Tone Toward Offshore Sites

Frames	Overall *Tone* toward Offshore Sites			
	Cannot be identified (*n* = 23)	Positive (*n* = 66)	Neutral (*n* = 12)	Negative (*n* = 1)
Denial of responsibility		14 (21.2)	3 (25)	1 (100)
Denial of injury		15 (22.7)	3 (25)	
Appeal to higher loyalties		1 (1.5)		
Claim of legitimacy	1 (4.3)	25 (37.9)	3 (25)	
Others		8 (12.1)	5 (41.7)	

indicate that OCR may serve as a facilitator of offshore gambling. Many of them encourage U.S. players to use offshore gambling sites by recommending or writing a positive review on the offshore sites. This is also enhanced by online gambling affiliate program — a referral program for OCR (Lopez-Gonzalez & Tulloch, 2015).

It is notable that OCR play a significant role in online gambling business ecosystem by recommending online gambling sites (Houghton et al., 2019; Lopez-Gonzalez & Tulloch, 2015). In other words, players may rely on information from OCR in choosing their online gambling sites. It is likely that their perceptions toward an online gambling site is contingent on how OCR present the site. Players may expect accurate, reliable information and honest, impartial evaluation on which they can make a reasonable decision grounded from OCR.

However, most OCR also pursue profit and are likely to provide biased information with the intention of promoting online gambling sites they are affiliated with (Brozio, 2018; Sutevski, n.d.). A majority of OCR promoted offshore sites, which may be due to the fact that affiliating with the offshore market is more profitable and easier to work with than the U.S. legal market (Ruddock & Gros, 2020). Most of these OCR provided gambling information with a positive tone primarily towards offshore sites and depicted offshore sites with words that give positive images of the sites, such as "Best", "Top", and "Safe", which encourages the use of offshore sites. If players come across these positive descriptions of offshore sites over and over, or from multiple sources, they are likely to deem the offshore sites as legitimate and be deluded into using those offshore sites (Bornstein & D'agostino, 1992; Tewksbury & Scheufele, 2009).

In addition, the legality issue of using offshore sites in the U.S. was generally not addressed — not only was it ignored in most of the offshore OCR but it was also ignored in the legal OCR. It would be reasonable to assume that offshore OCR are less likely to address the legality of offshore sites in the U.S., since it would not help in promoting offshore sites. Regarding online gambling legality issues, OCR promoting legal online gambling sites tended to focus on explaining which site is legal in which state, but did not particularly address about illegal online gambling or offshore sites. Given that the complexity of online gambling laws across the states, it might be easier for legal OCR just to present "what is legal" information.

However, this "what is legal" information was also manipulated and presented in some of the offshore OCR in multiple ways, such as falsely claiming that online gambling is legal in the U.S. or falsely introducing offshore sites as legal while providing correct legal information about online gambling. It is likely that individuals who are not familiar with online gambling would not be able to distinguish the correct "what is legal" information from those false ones easily. Therefore, the questionable content presented in offshore

OCR can mislead players into falsely believing that they are legal players while doing illegal online gambling, which was shown in AGA's survey in which most of the offshore players were not aware of their illegal online gambling (AGA, 2020).

While licensed legal OCR are subject to the scrutiny of state gaming authorities, there is almost no authority to monitor offshore OCR and regulate their contents since most offshore OCR are independent third parties (Brozio, 2018; Ruddock & Gros, 2020). In addition, offshore OCR use "Terms of Services" documents to protect themselves from liability for any misinformation or incorrect information. Terms of Services — also known as Terms of Conditions or Terms of Uses — is a legally binding contract between service providers and users. These agreements generally include a section that limits liability for any errors in the content on the website. This type of clause notifies users that the website does not take legal responsibility for any errors or omissions or for inaccurate information. Although offshore OCR present false information about online gambling, they avoid liability by specifying in their Terms of Services that the information is for entertainment purposes and that they are not responsible for any errors in the presented content (King, 2021). In other words, even if players suffer from misleading information offered by OCR, they cannot legally accuse the OCR (Choi et al., 2020).

Some offshore OCR provided certain interpretations of using offshore sites in the U.S. Within these frames, legal issues and information of using offshore sites in the U.S. were construed and viewed from the perspectives that encourage of using offshore sites. Through framing effects, this framing could motivate players to make decisions on using offshore gambling by manipulating their perception of offshore gambling (Chong & Druckman, 2007). While some sites falsely claimed that offshore gambling is legitimate in the U.S., others used different types of the justification that were designed to neutralize illegal online gambling. These interpretations were classified into several categories mostly based on the techniques of neutralization (Sykes & Matza, 1957), such as the claim of legitimacy, denial of responsibility, denial of injury, and appeal to higher loyalties. These frames mostly point out that the U.S. gambling regulations are to blame — as they are too complex and do not target individual players — and highlight that U.S. players are free from the regulations. While the U.S. gambling laws mostly target operators and financial institutions, the interpretations may delude players into believing that they would not be damaged by investigations for illegal online gambling.

However, offshore players often overlook the potential risk of losing their deposit, as a result of an investigation, a monitoring, or a crackdown (Choi et al., 2020). Players accessing OCR are bound to fall in the trap laid by misleading information designed to encourage using offshore sites (Brozio, 2018). The most vulnerable may be players who lack adequate knowledge or awareness of online gambling and who are at considerable risk of becoming involuntary offenders as well as unknowing victims, as they can unknowingly conduct the law-breaking behavior without knowing that they would be less likely to get support from or take a legal action against offshore sites when they seek doing it.

Policy Implication
Blocking Access to Offshore Affiliates

Given that most incorrect information about U.S. online gambling have been generated from OCR affiliated with offshore sites, restraining the online visibility of the offshore affiliates to U.S. potential players is a way to reduce a chance for the players to be exposed to the misleading information. In this context, the Australian Communications and Media Authority have taken such an approach by requiring Australian Internet Service Providers (ISPs) to block both offshore sites that have been illegally accepting Australian players and their affiliated OCR ("ACMA moves to block . . .", 2021; "Australia: ACMA orders blocking. . .", 2021). U.S. gambling regulators who have attempted to block access to major offshore sites themselves also need to employ this approach to effectively access not only to offshore sites but also to information that could mislead the naïve players.

Blocking of Payments

Another approach centers around the restriction of financial transactions revolving around offshore sites, which is in line with UIGEA — a federal law that bans payment processors from accepting funds associated with offshore sites. Although the federal restriction essentially ended the early days of illegal online gambling in the U.S., offshore sites nowadays have used alternative payment methods — such as money order, prepaid cards, and cryptocurrency — to evade the restriction. It would not be feasible to crack down on all these payment processes given limited law enforcement resources and abilities. One effective approach would be for law enforcement agencies to focus on blocking a few large, major payment processes and disseminate these efforts through media and online gambling forums, which could deter offshore players from making a deposit in offshore sites and eventually compromise offshore gambling businesses in the U.S.

Good Cop, Bad Cop

However, those two "blocking" approaches could turn into a whack-a-mole game. For examples, blocked websites can constantly come back to business by changing their domain information on which most website blocking techniques are based. Also, if one payment method is blocked, offshore operators can come up with other different methods. Therefore, additional efforts are essential not only to effectively deter offshore gambling but also to fundamentally eradicate it from the U.S. A "good cop, bad cop" approach could be effective in this context: expanding efforts to investigate and prosecute offshore operators, their affiliates, and other outlets that aid and abet illegal online gambling businesses, while encouraging unlicensed operators to turn into the licensed. Given that one of the major reasons for unsuccessful prosecutions regarding illegal online gambling businesses is due to a lack of capability to properly collect digital evidence (Masogo & Mofokeng, 2018), considerable resources and efforts need to be invested in improving abilities of cybercrime investigations and prosecutions. Simultaneously, U.S. governments can enhance benefits of promoting U.S. legal operators for OCR and create a favorable regulatory environment for offshore sites to become legal U.S. operators (Sayre & Tau, 2020).

Illegal Online Gambling Awareness

Players who lack awareness to identify manipulated online gambling information are apt to be misled by questionable contents presented by offshore OCR whose goal is to lead them to the offshore sites they are affiliated with. Although having an illegal online gambling awareness education does not guarantee protection from false information, it would help players enhance the ability to discern what information is correct and make rational choices in favor of legal online gambling. Such efforts can be found in several campaigns, including Bettor Safe, which is the latest illegal online gambling awareness campaign in the U.S. (Zobenko, 2021).

Bettor Safe is a national campaign that was launched in March, 2021 by the non-profit organization "Conscious Gaming" to reduce the gap between interest in online gambling and awareness of illegal online gambling (see https://bettorsafe.org). Its mission is to raise awareness of the illegal market by educating players to know where legal online gambling is and to discern legal from illegal sites. While this campaign currently targets audience in New Jersey and Pennsylvania, it should be widely promoted across the states, as anyone can be a potential online gambling player.

While the campaign has been promoted via multiple channels, such as radio, digital ads, Facebook, and Youtube (Fletcher, 2021), it would also be effective for legal OCR (where players who seek gambling information visit) to promote this campaign as well. Given that findings indicate that most legal OCR have currently focused on "what is legal" information, presenting information raising awareness of illegal online gambling or establishing a rating system for review sites, along with "what is legal" information, would not

only help players distinguish either legal from illegal sites or reliable from unreliable OCR but also benefit the legal market by helping turn illegal into legal players.

Verification Certificates

Also, legal states may issue a verification certificate that can be used to verify the credibility of OCR who have been legally licensed and only advertise regulated gambling websites. Displaying this certificate in the legal OCR can visually distinguish them from the offshore, which may help readers to discern the legal from the offshore. This certificate may also help legal OCR maintain validity and reliability of their contents.

Limitations and Future Research

This study used neutralization techniques to classify the frames used to justify the use of offshore gambling sites in the U.S. However, the criterion was not clear-cut; some justifications were too vague to fall in a specific category. In this case, the researcher classified those justification into the most relevant category, which may present a validity issue.

Regarding the content analysis, reliability and validity may be concerns as the analysis was conducted by a single researcher whose interpretations of the content could be biased or might be affected by other factors. For future studies, this study encourages employing multiple raters and conducting a same measurement over multiple occasions to accomplish reliability and validity of results of the studies (McHugh, 2012). Also, Bettor Safe may have limited potential for promoting itself in states where online gambling is illegal since this illegal online gambling awareness campaign also simultaneously promotes gambling websites licensed by other states.

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Appendix A

A List of Search Terms for Online Casino Review

Keywords	
U.S. online gambling reviews	US online gambling reviews
U.S. online casino reviews	US online casino reviews
U.S. online sports bet reviews	US online sports bet reviews
U.S. online sportsbook reviews	US online sportsbook reviews
U.S. online sports betting reviews	US online sports betting reviews
U.S. online poker reviews	US online poker reviews
U.S. online race reviews	US online race reviews
U.S. online slots reviews	US online slots reviews
American online gambling reviews	USA online gambling reviews
American online casino reviews	USA online casino reviews
American online sports bet reviews	USA online sports bet reviews
American online sportsbook reviews	USA online sportsbook reviews
American online sports betting reviews	USA online sports betting reviews
American online poker reviews	USA online poker reviews
American online race reviews	USA online race reviews
American online slots reviews	USA online slots reviews

Appendix B

A List of the Sample Online Casino Reviews

AmericaGambles	https://www.americagambles.com/casino/comparison/parx-online-casino/
AmericanCasinoGuide	https://www.americancasinoguide.com/reviews
AskGamblers	https://www.askgamblers.com/
BeatTheFish	https://www.beatthefish.com/
BestCasinos	https://www.bestcasinos.com/market/united-states/
BestCasinoSites.net	https://www.bestcasinosites.net/usa/paypal/
BestCasinoSitesOnline	https://www.bestcasinositesonline.com/casino-reviews/
BestOnlineCasinos	https://www.bestonlinecasinos.com/
BestUSACasinos	https://www.bestusacasinos.com/
BestUSAOnlineCasinos	https://www.bestusaonlinecasinos.com/
BestUSCasino	https://www.bestuscasinos.org/
BestUSCasinoSites	https://www.bestusacasinosites.com/
BettingUSA	https://www.bettingusa.com/casino/
Blackskies	https://www.blackskies.com/category/online-casino-reviews-usa-players/
Bojoko	https://bojoko.com/us/online-casinos/reviews/
BonusFinder	https://www.bonusfinder.com/
BonusSeeker	https://www.bonusseeker.com/online-casino
CaptainGambling	https://www.captaingambling.com/reviews/betmgm-casino/
CardsChat	https://www.cardschat.com/online-casinos.php
Casino18	https://www.casinos18.com/reviews/
CasinoFetch	https://www.casinofetch.com/online-casino-reviews/
CasinoFreak	https://www.casinofreak.com/
CasinoGuru	https://casino.guru/
CasinoListings	https://www.casinolistings.com/casinos/las-vegas-usa-casino-review
CasinoMeister	https://www.casinomeister.us/us-licensed-casinos/
Casino-On-Line	https://www.casino-on-line.com/online-casino.html
CasinoOrg	https://www.casino.org/
CasinoProper	https://www.casinoproper.com/
Casinos.us	https://www.casinos.us/online/
CasinosRealMoney	https://www.casinosrealmoney.com/las-vegas-usa-review/
CasinoTop10	https://www.casinotop10.net/
CasinoTopLists	https://www.casinotoplists.com/casino-reviews
CasinoTopsOnline	https://www.casinotopsonline.com/top-us-online-casinos
CasinoUS	https://www.casinous.com/

CasinoUSA	https://www.casinousa.com/
CasinoVa	https://casinova.org/
CasinoVibez	https://www.casinovibez.com/review/
CasinoWhizz	https://casinowhizz.com/
Cision	https://www.prnewswire.com/news-releases/15-best-slots-online-the-top-slot-machine-sites-in-usa-with-high-rtp-real-money-and-free-spins-301252373.html
CompareCasino	https://www.comparecasino.com/online-casino-reviews
CrossingBroad	https://www.crossingbroad.com/pa-online-casino
GambleOnline	https://www.gambleonline.co/
Gambling.com	https://www.gambling.com/us/unibet-us/casino
Gambling360	https://www.gambling360.com/online-casinos/
GamblingGuy	https://www.gamblingguy.com/online-casinos/
GamblingHerald	https://www.gamblingherald.com/category/casinos/us-online-casinos/
GamblingSites.com	https://www.gamblingsites.com/
GamblingSites.net	https://www.gamblingsites.net/usa/
GamblingSites.org	https://www.gamblingsites.org/
GamesAndCasino	https://gamesandcasino.com/us.htm
GlobeNewswire	https://www.globenewswire.com/en/news-release/2021/04/04/2204085/0/en/25-Best-Gambling-Sites-The-Top-Online-Casinos-Sportsbooks-and-Betting-Apps-in-the-USA.html
GoodCasino	https://goodcasinos.org/
Great.com	https://great.com/en-us/
InstantWithdrawals	https://instantwithdrawals.org/casinos/
JohnSlots	https://www.johnslots.com/en/united-states/
JustGamblers	https://justgamblers.com/reviews/resorts-online-casino/
LegalBettingOnline	https://www.legalbettingonline.com/casino/
LegalGamblingAndtheLaw	https://www.legalgamblingandthelaw.com/us/legal-us-online-casino-sites
LegalgamblingUSA	https://www.legalgamblingusa.com/
LegalUSPokerSites	https://www.legaluspokersites.com/real-money/
LegitGamblingSites	https://www.legitgamblingsites.com/online-casinos/las-vegas-usa/
LegitimateCasino	https://legitimatecasino.com/
LetsGambleUSA	https://www.letsgambleusa.com/
LiveCasinoUSA	https://www.livecasinousa.com/
LoginCasino	https://logincasino.org/blog/the-best-usa-online-casino-platforms-worth-checking62409.html
MetroPlay	https://www.metro.us/playmgm-review-a-rewarding-online-gambling-experience/

Michigansharp	https://www.michigansharp.com/online-casinos/
Montycasinos	https://montycasinos.com/reviews/
NJGames	https://njgames.org/nj-casino-reviews/
NoDepositCasinos247	https://www.nodepositcasinos247.com/usa-casinos/
OnlineCasinoBluebook	https://www.onlinecasinobluebook.com/
Online-Casinos	https://www.online-casinos.com/usa/
OnlineCasinoSnoop	https://www.onlinecasinosnoop.com/usa-online-casinos
OnlineCasinoUSAGuide	https://onlinecasinousaguide.com/
OnlineGambling.com	https://www.onlinegambling.com/
OnlinePokerReport	https://www.onlinepokerreport.com/us/casino/
OnlineUnitedStatesCasinos	https://www.onlineunitedstatescasinos.com/
PlayUSA	https://www.playusa.com/online-casinos/
ProfessionalRakeback	https://professionalrakeback.com/
RealMoneyAction	https://www.realmoneyaction.com/
RiverNileCasino	https://www.rivernilecasino.com/
SisterSitesIndex	https://sistersitesindex.com/usa-casino-sites/
Slotozilla	https://www.slotozilla.com/online-casinos
SlotsUp	https://www.slotsup.com/
TheSportsGeek	https://www.thesportsgeek.com/
Top10CasinoReviews	https://www.top10casinoreviews.com/usa-online-casinos/
Top10CasinoSites	https://www.top10casinosites.net/top-10-us-casino-sites
Top10CasinoWebsites	https://www.top10casinowebsites.net/usa
TopOnlineCasinoSites	https://toponlinecasinosites.com/usa/
TopRatedOnlineCasinos	https://www.topratedonlinecasinos.org/
UnitedStatesCasinos	https://www.bestunitedstatescasinos.com/
UnitedStatesGamblingOnline	https://www.unitedstatesgamblingonline.com/reviews/
USACasinoReviews	http://usacasinoreviews.com/
USAOnlineCasino	https://www.usonlinecasino.com/
USBets	https://www.usbets.com/mobile-casinos/
USCasinoReport	https://www.uscasinoreport.com/casino-reviews/
USGamblingSites	https://www.usgamblingsites.com/casinos/
USOnlineCasino	https://www.usonlinecasino.com/
USPoker	https://www.uspoker.com/
VegasSlotsOnline	https://www.vegasslotsonline.com/
WorldCasino	https://www.worldcasinoindex.com/online-casinos/
YesNoCasino	https://yesnocasino.com/usa-casino-bonuses/

Appendix C

Data Collection Sheet

Documentation Identification No.	
Name of Site	
URL	
Legality of Gambling Sites being Reviewed	0. No reviewed site 1. Legal 2. Offshore 3. Legal and offshore 4. Legal and social casino 5. Offshore and social casino
The Number of Offshore Gambling Sites being Reviewed (for US players)	
Overall Tone Toward Offshore Gambling Sites	0. Cannot be identified 1. Positive 2. Neutral 3. Negative
Notes	
Words Describing Promoted Gambling Sites	
Notes	
Portrayal of using Offshore Gambling Sites in the U.S.	0. Cannot be identified 1. Denial of responsibility 2. Denial of injury 3. Condemnation of condemners 4. Appeal to higher loyalties 5. Legal and legitimate 6. Others
Notes	
Other Notes	