



DISPOSITION JUNE 2020 AGENDA

IN COMPLIANCE WITH THE GOVERNOR'S EMERGENCY DIRECTIVE #006, DATED MARCH 22, 2020, THE JUNE 2020 MEETING OF THE NEVADA GAMING COMMISSION WAS CONDUCTED BY MEANS OF ELECTRONIC COMMUNICATION.

June 25, 2020

Members Present:

Vacant, Chairman

John T. Moran, Jr., Acting Chairman (Participated via video)

Deborah J. Fuetsch, Member (Participated via video)

Rosa Solis-Rainey, Member (Participated via video)

Steven Cohen, Member (Participated via video)

MEETING AGENDA

10:00 A.M.

- I. **PUBLIC COMMENTS:** This public comment agenda item is provided in accordance with NRS 241.020(2)(c)(3) which requires an agenda provide for a period devoted to comments by the general public, if any, and discussion of those comments. No action may be taken upon a matter raised under this item of the agenda until the matter itself has been specifically included on an agenda as an item upon which action will be taken. Comments by the public may be limited to three minutes as a reasonable time, place and manner restriction, but may not be limited based upon viewpoint.

Refer to Public Comments Attachment 1. In addition, update from Board Member Johnson regarding COVID 19 impacts on the gaming industry and Board staff response.

II. **APPROVAL OF PRIOR MONTH NGC DISPOSITION**

FOR POSSIBLE ACTION: Pursuant to NRS 241.035, approval of Nevada Gaming Commission Disposition for May 2020.

Approved.

III. **NONRESTRICTED AGENDA ITEMS**

FOR POSSIBLE ACTION: Consideration of Nonrestricted Items listed in the following pages.

Action taken as reflected on the following material.

IV. **RESTRICTED AGENDA ITEMS**

FOR POSSIBLE ACTION: Consideration of Restricted Items listed in the following pages.

Action taken as reflected on the following material.

V. **REGULATION(S)**

FOR POSSIBLE ACTION:

1. **FOR FINAL ADOPTION**

2020-01R: CONSIDERATION OF ADOPTION OF PROPOSED AMENDMENTS TO NEVADA GAMING COMMISSION REGULATION 4 REGARDING, WITHOUT LIMITATION, APPLICATION FEES.

PURPOSE: To update the nonrefundable application fee amounts for the first time since June of 1985; and to take such additional action as may be necessary and proper to effectuate this stated purpose.

Regulation adopted, draft dated January 14, 2020, effective August 1, 2020.

FOR POSSIBLE ACTION:

2. **FOR FINAL ADOPTION**

2020-02R: CONSIDERATION AND RECOMMENDATION OF PROPOSED AMENDMENTS TO NEVADA GAMING COMMISSION REGULATION 14 REGARDING, WITHOUT LIMITATION, SOFTWARE SUBMISSION AND FIELD TESTING GAMING DEVICES.

PURPOSE: To change the methods and formats of software submissions to the Board; to establish standards for the methods and formats of software submissions; to change the time periods applicable to field testing gaming devices and modifications of gaming devices for field tests conducted pursuant to New Innovation Beta; and to take such additional action as may be necessary and proper to effectuate these stated purposes.

Regulation adopted, draft dated March 20, 2020, effective upon adoption.

FOR POSSIBLE ACTION:

3. **FOR FINAL ADOPTION**

2020-03R: CONSIDERATION AND RECOMMENDATION OF PROPOSED AMENDMENTS TO NEVADA GAMING COMMISSION REGULATIONS 1 AND 14 REGARDING, WITHOUT LIMITATION, ELECTRONIC TRANSFERS OF MONEY TO A GAME OR GAMING DEVICE.

PURPOSE: To update the definitions of "counter games payout," "counter games write," "debit instrument," "drop," "electronic money transfer," and "jackpot payout" with regard to new terms of art and with regard to allowing electronic transfers of money to games or gaming devices; to update the definition of cashless wagering system to reflect a new term of art; to delete the prohibition concerning electronic funds transfers from a financial institution to a game or gaming device; to add a new section governing electronic transfers of money using a debit instrument to a game or gaming device; and to take such additional action as may be necessary and proper to effectuate these stated purposes.

Regulations adopted, drafts dated June 10, 2020, effective upon adoption.

VI. **OTHER:**

Administrative Reports

- Board Chair – Update on July Agenda.
- Commission Chair – No report.
- Attorney General – No report.

VII. **PUBLIC COMMENTS:** This public comment agenda item is provided in accordance with NRS 241.020(2)(c)(3) which requires an agenda provide for a period devoted to comments by the general public, if any, and discussion of those comments. No action may be taken upon a matter raised under this item of the agenda until the matter itself has been specifically included on an agenda as an item upon which action will be taken. Comments by the public may be limited to three minutes as a reasonable time, place and manner restriction, but may not be limited based upon viewpoint.

Refer to the Public Comments Attachment 2.

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Heyday Inn	R #11		

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FOR POSSIBLE ACTION:

01-06-20 N19-0053 Re: 32018-01
SCIENTIFIC GAMES CORPORATION (PTC)
6601 BERMUDA RD
LAS VEGAS, NV 89119

BARRY LAINE COTTLE
President/Chief Executive Officer/Director

APPLICATION FOR FINDING OF SUITABILITY AS AN OFFICER AND DIRECTOR

GCB RECOMMENDS: APPROVAL.

NGC DISPOSITION: APPROVED.

FOR POSSIBLE ACTION:

02-06-20 N20-0481 Re: 33791-01
34287-01 (M)
34288-01 (D)
BC TECHNOLOGIES LLC, dba
BC TECHNOLOGIES
410 S RAMPART BLVD STE 390
LAS VEGAS, NV 89145

VAHAGN BADALYAN
Member/Manager/Chief Executive Officer

100%

BRUCE MERATI
Manager/Chief Financial Officer/Chief Technology Officer

APPLICATIONS FOR LICENSURE AS A MANUFACTURER AND DISTRIBUTOR

APPLICATIONS FOR LICENSURE AS A SOLE MEMBER, MANAGER, AND/OR KEY EXECUTIVE

GCB RECOMMENDS:

APPROVAL, LIMITED LICENSE TO EXPIRE AT MIDNIGHT OF THE DECEMBER 2020 NGC MEETING ON THE DAY THE ITEM IS HEARD.

NGC DISPOSITION: APPROVED, LIMITED – SAME.

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FOR POSSIBLE ACTION:

03-06-20 N20-0298 Re: 30637-01
35236-01 (M)
35237-01 (D)
NRT TECHNOLOGY CORP.
10 COMPASS CT
TORONTO M1S 5-R3
CANADA

APPLICATIONS FOR LICENSURE AS A MANUFACTURER AND DISTRIBUTOR

GCB RECOMMENDS: APPROVAL, CONDITIONED:

(1) THE MANUFACTURER AND DISTRIBUTOR LICENSES ARE LIMITED TO CASHLESS WAGERING SYSTEMS ONLY.

NGC DISPOSITION: APPROVED, CONDITIONED – SAME.

FOR POSSIBLE ACTION:

04-06-20 N20-0476 Re: 31395-01
N18-0099 EVERI HOLDINGS INC. (PTC)
7250 S TENAYA WY STE 100
LAS VEGAS, NV 89113

APPLICATION FOR AMENDMENT TO ORDER OF REGISTRATION

**APPLICATION TO PLEDGE THE EQUITY SECURITIES OF EVERI PAYMENTS INC.,
AND EVERI GAMES HOLDING INC., TO JEFFERIES FINANCE LLC, AS
COLLATERAL AGENT, IN CONJUNCTION WITH A TERM LOAN CREDIT
AGREEMENT**

Re: 31177-01
EVERI GAMES HOLDING INC.
(Everi Holdings Inc. (PTC) – 100%)
7250 S TENAYA WY STE 100
LAS VEGAS, NV 89113

**APPLICATION TO PLEDGE THE EQUITY SECURITIES OF EVERI GAMES INC., TO
JEFFERIES FINANCE LLC, AS COLLATERAL AGENT, IN CONJUNCTION WITH A
TERM LOAN CREDIT AGREEMENT**

GCB RECOMMENDS: APPROVAL, SEVENTH REVISED ORDER OF REGISTRATION, DRAFT #1.

NGC DISPOSITION: APPROVED, SEVENTH REVISED ORDER OF REGISTRATION – SAME.

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FOR POSSIBLE ACTION:

05-06-20 N20-0373 Re: 24297-01
ARISTOCRAT LEISURE LIMITED (PTC)
85 EPPING RD
BUILDING A
NORTH RYDE, NSW 2113
AUSTRALIA

APPLICATION FOR A CONTINUOUS OR DELAYED PUBLIC OFFERING

Re: 04992-01
ARISTOCRAT TECHNOLOGIES, INC.
(Aristocrat International Pty Ltd – 100%)
10220 ARISTOCRAT WAY
LAS VEGAS, NV 89135

**APPLICATION TO GUARANTEE SECURITIES AND HYPOTHECATE ASSETS IN
CONJUNCTION WITH A CONTINUOUS OR DELAYED PUBLIC OFFERING**

Re: 09886-01
ARISTOCRAT TECHNOLOGIES AUSTRALIA PTY LTD
(Aristocrat International Pty Ltd – 79%)
(Aristocrat Technologies Holdings Pty Ltd – 21%)
85 EPPING RD
BUILDING A
NORTH RYDE, NSW 2113
AUSTRALIA

**APPLICATION TO GUARANTEE SECURITIES AND HYPOTHECATE ASSETS IN
CONJUNCTION WITH A CONTINUOUS OR DELAYED PUBLIC OFFERING**

GCB RECOMMENDS: APPROVAL, SHELF ORDER, DRAFT #1.

NGC DISPOSITION: APPROVED, SHELF ORDER – SAME.

FOR POSSIBLE ACTION:

06-06-20 N19-0596 Re: 09587-01
WYNN LAS VEGAS, LLC
(dba Wynn Las Vegas)
3131 LAS VEGAS BLVD S
LAS VEGAS, NV 89109

THOMAS JOSEPH REICH
Senior Vice President/General Counsel/Secretary

APPLICATION FOR LICENSURE AS A KEY EXECUTIVE

GCB RECOMMENDS: APPROVAL.

NGC DISPOSITION: APPROVED.

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FOR POSSIBLE ACTION

07-06-20 N20-0009 Re: 20401-01
NEW YORK – NEW YORK HOTEL & CASINO, LLC
(dba New York – New York Hotel & Casino)
3790 LAS VEGAS BLVD S
LAS VEGAS, NV 89109

and

26535-01
MGM GRAND HOTEL, LLC
(dba MGM Grand Hotel/Casino)
3799 LAS VEGAS BLVD S
LAS VEGAS, NV 89109

MARK BRANDON CZERNIAK
Chief Financial Officer/Vice President

APPLICATIONS FOR LICENSURE AS A KEY EXECUTIVE

GCB RECOMMENDS: APPROVAL.

NGC DISPOSITION: APPROVED.

FOR POSSIBLE ACTION:

08-06-20 N19-0105 Re: 33020-01
GOLDEN ENTERTAINMENT, INC. (PTC)
6595 S JONES BLVD
LAS VEGAS, NV 89118

DONALD GEORGE KARRER
Vice President of Information Technology

APPLICATION FOR FINDING OF SUITABILITY AS A KEY EXECUTIVE

GCB RECOMMENDS: APPROVAL.

NGC DISPOSITION: APPROVED.

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FOR POSSIBLE ACTION:

09-06-20 N19-0586 Re: 28799-01
LAS VEGAS SANDS CORP. (PTC)
3355 LAS VEGAS BLVD S
LAS VEGAS, NV 89109

LEWIS KRAMER
Director/Chairman of Audit Committee

APPLICATION FOR FINDING OF SUITABILITY AS A DIRECTOR

GCB RECOMMENDS: APPROVAL.

NGC DISPOSITION: APPROVED.

FOR POSSIBLE ACTION:

10-06-20 N20-0372 Re: 17534-01
AGRICULTURE DISTRICT #13
801 CAMPTON
ELY, NV 89301

**APPLICATION FOR AWARDING OF RACE DATES FOR AUGUST 21st, THROUGH
AUGUST 23rd, 2020**

GCB RECOMMENDS: APPROVAL.

NGC DISPOSITION: APPROVED.

FOR POSSIBLE ACTION:

11-06-20 N20-0429 Re: 17158-01
THE ELKO COUNTY FAIR BOARD
FAIRGROUND RD
ELKO, NV 89801

**APPLICATION FOR AWARDING OF RACE DATES FOR AUGUST 29th, THROUGH
SEPTEMBER 7th, 2020**

GCB RECOMMENDS: APPROVAL.

NGC DISPOSITION: APPROVED.

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FOR POSSIBLE ACTION:

01-06-20 R20-0184 Re: 31749-01
LOS COMPADRES RESTAURANT I, INC.
(dba Los Compadres)
25 FOOTHILL RD STE 1-2
RENO, NV 89511

RAFAEL VALENCIA MELENDREZ (Transferor)	40% (80 Shares Common Stock)
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MARITZA VALENCIA (Transferee) Shareholder	20% (40 Shares Common Stock)
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CARLOS VALENCIA (Transferee) Shareholder	20% (40 Shares Common Stock)
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APPLICATIONS FOR A TRANSFER OF INTEREST

APPLICATIONS FOR LICENSURE AS A SHAREHOLDER

GCB RECOMMENDS: APPROVAL.

NGC DISPOSITION: APPROVED.

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FOR POSSIBLE ACTION:

02-06-20 R20-0050 Re: 35052-01
11340-05
15 Machines NRJJ GROUP INC., dba
JIMMY'S @ MADISON'S
855 E TWAIN AVE STE 114
LAS VEGAS, NV 89169

JAMES BENSON LASH 33 1/3%
President/Director/Shareholder (1,000 Shares
Common Stock)

NEAL NORRIS DORFMAN 33 1/3%
Secretary/Director/Shareholder (1,000 Shares
Common Stock)

JAMES DALTON EMERSON 33 1/3%
Treasurer/Director/Shareholder (1,000 Shares
Common Stock)

APPLICATION FOR A RESTRICTED GAMING LICENSE

**APPLICATIONS FOR LICENSURE AS AN OFFICER, DIRECTOR, AND
SHAREHOLDER**

GCB RECOMMENDS: APPROVAL, CONDITIONED:

- (1) PRIOR TO THE ISSUANCE OF THE STATE GAMING LICENSE, THE LICENSEE SHALL ENTER INTO A SERVICE CONTRACT WITH A LICENSED SLOT ROUTE OPERATOR. THE TERM OF THE CONTRACT SHALL BE FOR AT LEAST A ONE YEAR PERIOD OF TIME.**
- (2) THE LICENSEE SHALL DEMONSTRATE SUCCESSFUL COMPLETION OF A REGULATORY COMPLIANCE SEMINAR FOR RESTRICTED LICENSEES WHICH IS DEEMED ACCEPTABLE TO THE NGCB CHAIR OR THE CHAIR'S DESIGNEE WITHIN 90 DAYS OF THE ISSUANCE OF THE STATE GAMING LICENSE. THIS CONDITION MAY BE ADMINISTRATIVELY EXTENDED BY THE NGCB CHAIR OR THE CHAIR'S DESIGNEE.**

NGC DISPOSITION: APPROVED, CONDITIONED – SAME.

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FOR POSSIBLE ACTION:

03-06-20 R20-0217 Re: 10753-01
12789-04
SARTINI GAMING, LLC, db at
FLOWING TIDE PUB & GRILL
3372 S MCCARRAN BLVD
RENO, NV 89502

FT PUB VII LLC
Business Operator

FTP HOLDING COMPANY, LLC
Member

100%

JASON CHRISTOPHER TOLOTTI
Manager

JUSTIN SETH MOSCOVE
Manager

**APPLICATION FOR LICENSURE OF FT PUB VII LLC, TO RECEIVE A PERCENTAGE
OF GAMING REVENUE FROM SARTINI GAMING, LLC, DB AT FLOWING TIDE PUB
& GRILL**

APPLICATIONS FOR LICENSURE AS SOLE MEMBER OR MANAGER

GCB RECOMMENDS: APPROVAL.

NGC DISPOSITION: APPROVED.

FOR POSSIBLE ACTION:

04-06-20 R20-0135 Re: 34615-01
21111-03
15 Machines EE TAVERN GROUP LLC, dba,
SNEAKERS BAR & GRILL #3
1380 DISC DR
SPARKS, NV 89436

APPLICATION FOR A RESTRICTED GAMING LICENSE

GCB RECOMMENDS: APPROVAL.

NGC DISPOSITION: APPROVED.

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FOR POSSIBLE ACTION:

05-06-20 R20-0206 Re: 32617-01
DEUX WHOPS LLC
(dba The Great American Pub)
4145 S GRAND CANYON DR STE 109
LAS VEGAS, NV 89147

JOHN SAMUEL DOMENICO)
(Transferor))

PENELOPE LOU DOMENICO) 66 2/3%
(Transferor)) JT

DEUX WHOPS LLC) 66 2/3%
(Transferee))

APPLICATION FOR DISPOSITION OF MEMBERSHIP INTEREST

**APPLICATION BY CHRISTOPHER RANDALL SCARPULLA TO PLEDGE HIS
MEMBERSHIP INTEREST IN DEUX WHOPS LLC TO KIRK WILLIAM BROOKS IN
CONJUNCTION WITH A LOAN AGREEMENT**

GCB RECOMMENDS: APPROVAL.

NGC DISPOSITION: APPROVED.

FOR POSSIBLE ACTION:

06-06-20 R20-0459 Re: 10559-01
34942-01
7 Machines CRAWFORD COIN, INC., db at
GREEN VALLEY GROCERY #64
6480 S HUALAPAI WAY
LAS VEGAS, NV 89148

**APPLICATION FOR A WAIVER OF THE PROVISIONS OF NGC REGULATION 4.080
(WHICH IMPOSES A SIX-MONTH TIME LIMITATION WITHIN WHICH COMMISSION
ACTION IS EFFECTIVE), IN CONNECTION WITH APPROVAL FOR A RESTRICTED
GAMING LICENSE GRANTED IN DECEMBER 2019**

GCB RECOMMENDS: APPROVAL, CONDITIONED:

**(1) THE WAIVER OF THE PROVISIONS OF NGC REGULATION 4.080, IN CONJUNCTION WITH THE APPROVAL
GRANTED IN DECEMBER 2019, SHALL EXPIRE ON THE DATE OF THE REGULARLY SCHEDULED NGC
MEETING IN DECEMBER 2020.**

NGC DISPOSITION: APPROVED, CONDITIONED – SAME.

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FOR POSSIBLE ACTION:

07-06-20 R20-0133 Re: 31072-01
35112-01
7 Machines JETT GAMING LLC, db at
TERRIBLE'S #381
439 E DORRELL LN
NORTH LAS VEGAS, NV 89084

APPLICATION FOR A RESTRICTED GAMING LICENSE

GCB RECOMMENDS: APPROVAL, CONDITIONED:

(1) THE SURVEILLANCE SYSTEM AND/OR MIRROR(S) MUST BE INSPECTED AND APPROVED BY THE NGCB ENFORCEMENT DIVISION WITHIN 60 DAYS OF ISSUANCE OF THE STATE GAMING LICENSE AND THEREAFTER BE MAINTAINED AT OR ABOVE THE STANDARD THAT IS APPROVED.

NGC DISPOSITION: APPROVED, CONDITIONED – SAME.

08-06-20 **REMOVED FROM AGENDA**

FOR POSSIBLE ACTION:

09-06-20 R20-0305 Re: 04789-01
00095-05
5 Machines UNITED COIN MACHINE CO., dba
CENTURY GAMING TECHNOLOGIES, db at
STAR HOTEL
246 SILVER ST
ELKO, NV 89801

APPLICATION FOR A RESTRICTED GAMING LICENSE

GCB RECOMMENDS: APPROVAL.

NGC DISPOSITION: APPROVED.

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FOR POSSIBLE ACTION:

**10-06-20 R20-0406 Re: 04789-01
07299-03**
5 Machines UNITED COIN MACHINE CO., dba
CENTURY GAMING TECHNOLOGIES, db at
7-11 STORE #26637
6080 W FLAMINGO RD
LAS VEGAS, NV 89103

APPLICATION FOR A RESTRICTED GAMING LICENSE

GCB RECOMMENDS: APPROVAL.

NGC DISPOSITION: APPROVED.

FOR POSSIBLE ACTION:

**11-06-20 R20-0321 Re: 10753-01
00727-06**
5 Machines SARTINI GAMING, LLC, db at
HEYDAY INN
3 WELLINGTON CUTOFF
WELLINGTON, NV 89444

APPLICATION FOR A RESTRICTED GAMING LICENSE

GCB RECOMMENDS: APPROVAL.

NGC DISPOSITION: APPROVED.

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FOR POSSIBLE ACTION:

12-06-20 R20-0293 Re: 10753-01
 33926-02
15 Machines SARTINI GAMING, LLC, db at
 THE SPEAKEASY
 10 VIA BRIANZA STE 110
 HENDERSON, NV 89011

APPLICATION FOR A RESTRICTED GAMING LICENSE

GCB RECOMMENDS: APPROVAL.

NGC DISPOSITION: APPROVED.

FOR POSSIBLE ACTION:

13-06-20 R20-0243 Re: 10753-01
 34757-02
15 Machines SARTINI GAMING, LLC, db at
 TAHOE TAVERN & GRILL
 219 KINGSBURY GRADE STE F & G
 STATELINE, NV 89449

APPLICATION FOR A RESTRICTED GAMING LICENSE

GCB RECOMMENDS: APPROVAL.

NGC DISPOSITION: APPROVED.

Bell, Marie

From: aleta dupree [REDACTED]
Sent: Wednesday, June 24, 2020 3:32 PM
To: publiccomment
Subject: Public comment for 25 June 2020

Attention Commission Secretary, please forward this message to the Nevada Gaming Commission for the Meeting and Hearings of 25 June, 2020.

Greetings Commission Members.

Aleta Dupree for the record. (she, her.)

I write to you today concerning the proposed changes to Regulations 1 and 14 that are put before you today.

I am simply an ordinary member of the Public, stating my ideas and comments concerning this matter. Briefly I submit to you that the idea of opening up the use of alternatives to cash in casino gaming is worthwhile, and something I do indeed support.

I state to you that I am always looking forward to safer and more convenient ways to pay for things, consequently for me, cash is something I rarely use, and only when I don't have another option. Options are indeed important for me as I go about my business, especially options that are easier for me to use.

It is time to move forward, and to offer patrons of casino gaming the same ease of use for making payment as they do with many other purchases of goods and services.

With that, I respectfully ask your approval of these regulatory changes.

Thank you.

June 23, 2020

To the esteemed members of the Nevada Gaming Commission,

The advent of cashless wagering is upon us and, some would say, long overdue. Cashless wagering provides a number of protections and advantages for both operators and patrons, and also lessens the potential for certain illegal activities such as money laundering to be carried out successfully. It is also an entirely appropriate mitigation measure to help slow the spread of COVID-19 and other contagious diseases through the elimination of many of the in-house "touch points" for both patrons and employees that are a normal part of cash wagering, and provides a more convenient means of accessing funds through operator-run accounts. However, that convenience and accessibility comes with a potential price for those who may be susceptible to developing a gambling disorder. I am writing today to advocate for the inclusion of meaningful responsible gaming standards within both existing and forthcoming cashless wagering systems.

I am an Associate Research Scientist with the Desert Research Institute who has conducted studies of the impact of problem gambling on special populations in the state of Nevada, and I have consulted for many years to both the gaming industry and to the Nevada Council on Problem Gambling. I have also served at the pleasure of three Governors on the State Advisory Committee on Problem Gambling since 2012. However, I list those affiliations simply as credentials, and my comments today are written only on behalf of myself as a person in long-term recovery from a very serious gambling disorder.

Many of Las Vegas's premier gaming properties and affiliated institutions are members of the American Gaming Association (AGA), which requires its members to adhere to a Code of Conduct in which they agree to prioritize Responsible Gaming as an integral part of their daily operations. Indeed, this past week the AGA issued a seven-point statement of principles on digital payment options designed to develop regulatory flexibility for cashless casino transactions. Chief among these principles was the admonition to "Equip customers with more tools to wager responsibly." The AGA is to be applauded for this and previous recognition of the importance of inclusion of high standards for responsible gaming. However, these are guiding principles only, and without minimum standards enshrined within a regulatory framework, may be ignored by many.

In order to ensure the health and welfare of Nevada's citizens, it is vital that the ability of patrons to access and utilize responsible gaming tools within cashless wagering systems be transparent, easy-to-implement, and ideally be elucidated during the initial registration process. At a minimum, cashless wagering systems should include not only additional regular responsible gaming messaging, but also the ability for patrons to self-exclude from cashless wagering, to self-limit in the areas of both funding and time, and to track and graphically view their past and current spending behaviors. Furthermore, formal registration to use such a system should not be based on a minimum required daily funding amount (e.g., \$1,000), but should occur at the first use, regardless of dollar amount. Particularly with regards to problem gambling, amounts have little relevance, and are all relative to the individual's situation. As a personal anecdote, over the course a single year I experienced losses that were greater than my annual 6-figure income, while rarely losing more than \$1,000 in a single day. Being able to register all customers who wish to take advantage of cashless systems has added benefits for operators, as well as allowing all patrons, regardless of cashless wagering amounts, to take advantage of responsible gaming tools. From a technological standpoint, all of the above-mentioned responsible gaming capabilities already exist. All that is lacking is the regulatory framework for implementation.

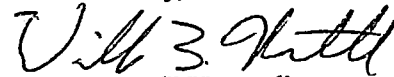
Finally, it is particularly important that whenever any new technologies or regulations are introduced, that research be conducted to ensure that the actual effect of implementation of same meets the intent, for both operators and patrons. Data associated with cashless funding and gambling behaviors should be decoupled from personal identifying information and provided to independent research bodies to provide for an evidence-based approach toward future implementation or reduction of regulation in this area.

As I have commented for previous meetings of the Commission this year, those returning to the gaming floor at this early stage of reopening, and possibly until a vaccine is developed for COVID-19, are likely to include a higher than usual percentage of individuals who are already suffering from a gambling disorder, and others who are suddenly at higher risk for developing a gambling problem specifically because of the pandemic. The financial, emotional, and psychological impacts brought about by factors such as isolation, trauma, and loss due to the events of the past few months have created a dangerous cocktail for those individuals who may be predisposed to problem gambling, and therefore not cognitively equipped to make healthy decisions with regards to their personal gambling behaviors. For these reasons, it is more vital than ever that responsible gaming be an integral part of any new technologies that provide for more convenient ease of access to funding through cashless wagering.

While I cannot turn back the clock and know with any degree of certainty whether or not additional messaging, the ability to electronically self-limit, or to track my own behavior while gambling would have prevented me from developing a gambling problem, I suspect that it might have led to my seeking out help sooner than I ultimately did, potentially lessening the financial damage and pain I visited on myself and my family.

I urge you to consider holding a workshop before final adoption of the standards under consideration today to further examine these concerns, and in order to provide for inclusion of the minimum standards outlined above within a regulatory framework on cashless wagering.

Most sincerely,

A handwritten signature in black ink, appearing to read "Will E. Hartwell". The signature is written in a cursive, somewhat stylized font.

William "Ted" Hartwell

June 25, 2020

Members of the Nevada Gaming Control Board and Nevada Gaming Commission,

Thank you for the opportunity to provide public comment today as you consider adoption of regulations related to electronic payments processing for gambling in Nevada. My name is Carol O'Hare and I am the Executive Director of the Nevada Council on Problem Gambling. In addition to my role with the Nevada Council, I have also served on the Governor's Advisory Committee on Problem Gambling since it was created by Nevada Statute in 2005, and I am a person with 29 years lived experience as a recovering compulsive gambler.

As you know, this is not the first time I have offered comments regarding concerns related to electronic funds transfers in the gaming environment. This is a discussion that has been taking place within the gaming industry, the finance industry and the gaming regulatory system for nearly two decades and the Council has been part of this discussion throughout. Along the way we have engaged with many stakeholders in all of these arenas which has helped us to better understand the advances in technology, including the capabilities to provide new levels of player protection to support Responsible Gaming. In these discussions we have gathered, shared and reviewed information relevant to electronic funds transfers in the gaming environment from every aspect possible, as this is an issue being discussed in many U.S. and international jurisdictions, not just Nevada. The volume of information suggests that advancing cashless wagering can present complex challenges in the regulated gaming environment, but the rationale for moving forward is basically sound, for the purpose of industry efficiencies, customer convenience, and now the sense of urgency to expand cashless wagering to prevent the spread of COVID-19.

The Council does not take a position for or against legal gambling, therefore it is not our role to impede industry innovation nor to endorse or oppose specific products or license applications. Our focus is on reducing potential harms associated with gaming through appropriate and effective public policy, and we recognize that new technologies can also provide new opportunities to increase player protections that support industry Responsible Gaming standards. As relates to your consideration today, we are advocating for the following key components to be included in the regulatory framework for advancing electronic payments processing in the Nevada gaming industry:

Required Player Registration

We believe it is critical that a player must first provide identifying information through a registration process before making their first cashless wagering transaction. Requiring registration is consistent with gaming and finance industry "know your customer" and anti-money laundering standards, and is necessary to insure full availability, access and effectiveness of enhanced Responsible Gaming features.

Player Protection Tools

In addition to existing requirements for Responsible Gaming messaging, the following player protection tools should be minimum standard requirements in any approved cashless wagering system in Nevada:

- Ability for player to set personal daily/weekly/monthly funding and time limits
- Visualization tools to support player awareness of their gaming spending history
- Ability for player to temporarily or permanently suspend or close their account

It is not enough for these functions to simply exist within the technology, allowing operators to decide whether or not to use them. These functions must exist, and be turned on when the system is implemented and remain available as a condition of licensing. Without a uniform application of these tools, there will be little or no benefit to the public. We also strongly recommend that information about the availability and access to these tools be immediately provided during the initial registration and always readily available to the player throughout the platform.

Research and Evaluation

Implementation of electronic payments processing for cashless wagering should include a mandate for gaming operators and technology providers to collect and share anonymized player data to support ongoing evaluation and research. Every discussion of this technology for years has pointed to the lack of research to guide policy in this area. Research will only happen if the data is collected and made available to independent qualified research entities for evaluation.

As regulators, you have the authority to include all of these concepts in regulation and we believe there is sufficient consensus among many stakeholders to do so. However, we respectfully ask that the Commission hold a public workshop before moving forward to approve any final regulations, to allow opportunity for robust engagement of all stakeholders in developing the best standard possible for advancing this technology safely and responsibly in the gaming environment. We look forward to participating in further discussions and would be happy to provide additional information as needed.

Sincerely,



Carol O'Hare, Executive Director
Nevada Council on Problem Gambling



June 25, 2020

Dear Members of the Nevada Gaming Control Board and Nevada Gaming Commission,

On behalf of the National Council on Problem Gambling (NCPG), thank you for allowing us to provide comments on the proposed amendments to the Nevada Gaming Regulations, related to cashless wagering. NCPG is the national advocate for programs and services to assist problem gamblers and their families. NCPG was founded in 1972 to lead state and national stakeholders in the development of comprehensive policy and programs for all those affected by problem gambling. NCPG is neutral on legalized gambling and works to improve health and wellness by reducing the personal, social, and economic costs of problem gambling. NCPG members include the Nevada Council on Problem Gambling as well as many gambling operators and vendors. The Nevada Council on Problem Gambling has also submitted comments for the record today.

When considering requests to relax restrictions on payments the Commission must consider the additional risk factors for gambling problems due to both the COVID-19 crisis and the nature of cashless gambling. It is vital to balance the costs and benefits of cashless gambling.

First, the pandemic has led to great financial and emotional stress as well as job loss (29% of Nevadans are currently unemployed) and these factors are all associated with higher rates of gambling problems. Access to counseling and self-help meetings is curtailed due to social distancing. As a result, problem gamblers face worse outcomes and people in recovery may be more likely to relapse.

Second, cashless gaming is likely to increase risk of gambling problems. Research and experience make clear that financial problems are one of the most common consequences of gambling addiction. Indeed, borrowing money to relieve gambling-related financial problems is one of criteria for gambling disorder. Increasing losses may lead to chasing, intensifying a cycle of desperation “often driven by irrational and erroneous cognitions.”¹ Digital payments may increase these problems by allowing gamblers greater access to their funds more quickly. Each type of payment used for gambling—from cash to debit cards to e-wallets—can impact how quickly and easily individuals may access more money, how much they can obtain at a time, and add additional costs, such as ATM fees or interest charges. Electronic funds may not be seen as “real” money, resulting in higher spending. These negative impacts may be particularly pronounced among people with gambling problems.

Indeed, the United Kingdom Gambling Commission banned the use of credit cards for online gambling in April of this year, and recently added clarifying regulations banning operators from using an e-wallet or any payments system that allows accounts to be funded by a credit card.

However, account-based cashless systems may also facilitate responsible gambling. These technologies may enable individuals to set responsible limits for themselves, creating friction, and allowing for vital tools such as self-exclusion to be accessed more easily than ever before. NCPG has published Guidelines for Payments Processing² that highlights pertinent requirements for all regulators to consider when

¹ *Gambling-related consumer credit use and debt problems: a brief review*. Thomas B Swanton and Sally M Gainsbury. *Current Opinion in Behavioral Sciences*, 31:21–31 (2019)

² *NCPG Guidelines for Payment Processing*, February 3, 2020. <https://www.ncpgambling.org/wp-content/uploads/2020/02/02-03-20-NCPG-Payments-Processing-RG-Guidelines-Press-Release.pdf>.

implementing protocols for cashless systems. These guidelines detailed below cover limits, KYC, exclusion, information, and research in order to mitigate risk and reduce harm associated with cashless wagering.

Limits: Limits on payments are an important responsible gambling tool. Limits are a consumer-centric approach that emphasizes player control, information, and shared responsibility. For limits to be effective they must be able to apply across accounts and types of gambling regardless of the method of payment. Providing players with information and guidance around risks and norms helps them set more meaningful limits. All approved technological systems must provide all players with an **opt out** solution to set limits (both time and money). Operators should encourage and even incentivize the player to set payment limits. Other critical features for limits include but are not limited to the following:

- Players must be provided the option of setting daily, weekly, or monthly limits on the size of deposits.
- Players must be able to lower limits immediately.
- Players may request increases in or removal of their limits.
- Play is stopped when the limit is reached.
- After the period ends and a request for increase or removal is made, there will be an additional delay of at least 24 hours. The player must reconfirm their request for the limit to be changed.
- Limits should be periodically reviewed, with payments history and analysis of current deposits and spending projected on an annual basis

Know Your Customer: Operators must make every effort to verify identity of customers through their payment history, including a thorough age and identification verification process when setting up their payment methods. This includes ensuring that no cashless wagering is ever anonymous. Just as Pennsylvania requires, we strongly suggest that every customer who wishes to use cashless for their transactions must register before being able to fund the account.

Information: Players must routinely receive information on their payment's activity; and regularly receive information on their overall activity and identifiers of potentially risky behavior. Players should instantly have access to their account details, including: all deposits and withdrawals, movement of funds between products, bonus information, restrictions such as exclusion events and limits, net outcomes including total won or lost over a defined period. This information should be readily available and accessible at any time upon request.

Self-exclusion: The gambling operator should provide individual customers with the ability to exclude themselves from gambling that includes blocking of any ability of the customer to use any payment method. Players should also have the ability to block themselves from particular payment types. Payment processors, banks, credit card companies and others should have their own self-exclusion programs as well. Additionally, all systems must allow players to synchronize their exclusions with venue and state exclusion lists.

Research: Data on gambling deposits and other transactions that is collected by operators and vendors across the payment ecosystem should be made publicly available through the regulatory agency to qualified researchers. This metadata must be anonymized to remove personally identifying information, consistent with Federal and state privacy, intellectual property and freedom of information laws. As a condition of licensure, operators and vendors should be required to share data. During the regulatory

approval process, the responsibility should be placed on applicants to provide research and data to show that new payments products and services do not increase gambling-related harm. This information—including from cashless debit systems already operating in Nevada—should include but not be limited to examining markers of harm such as; percentage of attempted debit transactions rejected due to NSF, percentage of individuals whom are debiting more than ten percent of their bank account, the number of transactions made per day per person, the number of persons that hit their daily limits as well as the regulator or bank imposed limits.

Therefore, National Council on Problem Gambling urges the Commission to incorporate these responsible gambling guidelines into Gaming Regulation. In addition, we support fully the statements provided by the Nevada Council and their recommendations.

The National and Nevada Councils have consistently advocated for such responsible gambling principles during Commission consideration of payments issues.³ The effects of COVID-19 combined with the risks of cashless payments make it imperative to adopt strong responsible gambling regulations. Problem gambling-related criminal justice and healthcare costs fall heaviest on state and local government budgets. Responsible gambling is the most ethical and effective way to minimize harm and maximize benefits.

We appreciate your consideration and will be happy to answer any questions or concerns that you may have.

Respectfully,

Keith Whyte



Executive Director

Cc: Carol O'Hare, Executive Director, Nevada Council on Problem Gambling

Brianne Doura-Schawohl, Legislative Director, National Council on Problem Gambling

³ See for example: Nevada Council on Problem Gambling: TESTIMONY TO THE NEVADA GAMING COMMISSION, May 22, 2003; National Council on Problem Gambling letter to Nevada Gaming Commission re ASSOCIATED EQUIPMENT CONCEPT APPROVAL: 01-09-07 CONCEPT: "EDITH, ATM DISPENSED WAGERING INSTRUMENTS" September 5, 2007; Statement of Keith Whyte to Nevada Gaming Commission Regarding Associated Equipment Concept Approval: EDITH, ATM Dispensed Wagering Instruments, September 20, 2007.

Bell, Marie

From: Sara [REDACTED]
Sent: Thursday, June 25, 2020 12:28 PM
To: publiccomment
Subject: Look; Listen ; Speak Regarding COVID-19

Hello Nevada GCB,

All these casinos need to put top priority on following your set requirements and the governors orders during the re - openings with this COVID -19.

I am a casino dealer communicating on the actions I have seen made for protecting the employees and the guest with face masks, practicing social distancing and all the hand sanitizers.

There are several Casinos where employees and the guest do not wear Face Mask; do not practice social distancing and do not use or present any hand sanitizer anywhere.

I write to you, asking the Nevada GCB to investigate the Casino properties; find thoses not following the requirements needed to re-open and bring this to the next chapter by shutting those doors, stop the revenue growth and fine them while asking these companies WHY be the ThumbNail to ruin a new beginning for everyone with these disturbing actions!! Are they wanting to repeat the last 12 week activity being FURLOUGHED or LAID OFF during the lockdown?

This is a vicious virus and will not stop. We are going in a large broken circle with some states pausing there re - opening and the thought of shutdown is on the walls.

Please protect American lives. Follow the rules, orders and requirements.

Thank You,
Sara Warpness

Sent from my Verizon, Samsung Galaxy smartphone

Attn: John T. Moran Jr., Acting Chairman of the Nevada Gaming Commission:



Hi John,
I'm Ray Shemanski, and I lead the U.S. and Canada business for Brink's, the world's largest cash management and secure logistics company. Recently, our team learned of the upcoming hearing with Nevada Gaming regulators on cashless payments and transactions on the casino floor due to COVID-19.

Casino employees, like Brink's employees, handle cash on a daily basis, and we must ensure they have a healthy and safe work environment. We are safely handling and transporting money daily by following recommended guidelines and implementing new safety standards during the pandemic. We issued masks and gloves to our teams and conduct temperature checks and health questionnaires before every shift. Additionally, we have increased our sanitization efforts inside our branches, vaults and armored trucks.

From one business leader to another, I would like to share a few facts and figures on why cash is still by far the best option for casino transactions. **COVID-19 transmission risk from currency is extremely low.** Medical experts, epidemiologists and researchers have explained the virus is transmitted person to person, between people who are within six feet of each other, and through droplets produced by an infected person's cough or sneeze. The World Health Organization (WHO) has also stated that touching banknotes presents a low risk of COVID-19 transmission.

Digital technology poses a risk to privacy and secure financial transactions.

Using cash in the casino is simple and easy -- no passwords or PIN numbers and checking balances. Cash can't be hacked and it is safe from identity theft, crashing IT systems and even power outages. We trust cash because it safeguards our personal information, our privacy and spending habits. Also, digital casino transactions open the door to a new level of cybercrimes and cybersecurity issues that continue to attack business and technology systems every day.

Cash represents 26% of transactions and serves those without other payment options.

Cash is at the heart of casino gaming fun, and it is still quite popular elsewhere. In fact, the Federal Reserve cites cash as the most popular form of payment, accounting for 26% of U.S. consumer transactions – more than any other payment method. The cashless approach has been widely panned in many areas, because it excludes approximately 25 percent of people in the U.S. who are either totally "unbanked" or "underbanked."

As the leaders of the Nevada Gaming Commission convene to discuss this issue, I hope that you will consider these three points – virus transmission on banknotes is low, digital transactions invite the risk of cybercrimes, and cash is still the number one way to pay. I welcome the opportunity to discuss this matter further. Please feel free to reach out to me at the phone number or email below.

Thank you for your time,
Ray Shemanski, President, U.S. and Canada, Brink's Inc.
Email: Ray.Shemanski@brinksinc.com or Phone: 469-549-6186

Howard & Howard

law for business[®]

Chicago

Detroit

Las Vegas

Los Angeles

Peoria

Via Email regcomments@gcb.nv.gov

June 19, 2020

John T. Moran, Jr., Member
Deborah J. Fuetsch, Member
Rosa Solis-Rainey, Member
Steven B. Cohen, Member
Nevada Gaming Commission
1919 E. College Parkway
Carson City, NV 89702

RE: 2020-03R
Comments regarding proposed amendments to Nevada Gaming Regulation 14

Dear Members Moran, Fuetsch, Solis-Rainey and Cohen,

On behalf of Sightline Payments, LLC and other interested parties, thank you for the opportunity to offer comments on the proposed amendments to Nevada Gaming Regulation 14, recommended for approval by the Nevada Gaming Control Board on June 10, 2020. Specifically, the Nevada Gaming Control Board has recommended the addition of the following language to Regulation 14:

14.265 Electronic transfers of money using a debit instrument to a game or gaming device. A licensee shall not allow a patron to use a debit instrument for purposes of making electronic transfers of money from a financial institution directly or indirectly to a game or gaming device unless the transfer uses a cashless wagering system approved by the Chair for such transfer. This subsection only applies to electronic transfers of money at a game or gaming device.

Sightline Payments supports this clarification of Regulation 14 and respectfully submits the following comments related to cashless wagering.

"Known Customers"

- Know Your Customer ("KYC") is a central tenant of all banking and financial services, permitting the financial services ecosystem defined and regulated by the FDICⁱ, OCCⁱⁱ, FinCENⁱⁱⁱ, FFIEC^{iv}, CFPB^v, and various state banking regulatory bodies to foster trust and reliability.
- KYC combats money laundering and terrorist financing.
- KYC reduces fraud and will protect Nevada Licensees, suppliers and operators alike.
- **KYC is a critical pillar of a successful cashless ecosystem.** It provides a system of integrity that protects the patron, the operator, the suppliers, and the State of Nevada.
- **KYC allows for responsible gaming tools to be entwined into the fabric of any cashless wagering ecosystem**, ensuring Nevada as the regulatory and technological leader in payments modernization.
- KYC is already extensively used in Nevada for sports, poker, casino credit and account wagering.

As such, we respectfully request that the Commission ensure that **cashless wagering should never be anonymous and every patron should be a known customer** to a minimum of one entity in any cashless wagering ecosystem approved by the Commission, including but not limited to the holder of the cashless wagering system license.

In order for a cashless wagering system to accurately account for and protect monetary transactions, the licensee must be able to identify the patron. Nevada's current policy of requiring the disclosure of certain information similar to that currently required pursuant to Regulation 5.225 in order for a customer to establish a wagering account, including: (1) the identity of the patron; (2) the patron's date of birth; (3) the patron's physical address; and (4) the last four digits of the patron's social security number, if a United States resident. **It is our position that establishing customer identity prior to allowing that customer to wager electronically is consistent with best practices to prevent money laundering and problem gambling.**

www.howardandhoward.com

Wells Fargo Tower, Suite 1000, 3800 Howard Hughes Parkway, Las Vegas, NV 89169-5980

tel 702.257.1483 fax 702.567.1568

ATTACHMENT – REGULATION COMMENT
JUNE 25, 2020

Under proposed Regulation 14.265, an approved cashless wagering system must be utilized for an electronic transfer of money to a game or gaming device using a debit instrument. Direct wagering at a gaming device or an electronic funds transfer to a gaming device through the use of a credit card is currently prohibited in Nevada (Nevada Technical Standard 3.150). **Our position is entirely in concurrence with these existing standards and regulations.**

To the extent that Nevada amends its existing gaming regulations to allow for cashless wagering directly at a gaming device or table game, the presence of a cashless wagering system licensee in the payments ecosystem, whether held by the systems provider, the payments processor or the operator, is essential to maintaining the integrity of gaming in Nevada. A cashless wagering system licensee must record and maintain records for all electronic funds transfers and provide for on-line, real-time validation of wagering instruments. As noted by the American Gaming Association in its *Principles for Casino Gaming Payments Modernization* released on June 16, 2020, casino customers should feel confident in the security of digital gaming transactions regardless of the gaming environment or physical jurisdiction.

Best Practices

Anonymous cashless wagering is entirely contradictory to responsible gaming best practices. Although cashless wagering systems are not designed to target the problem gambler, such systems do allow for the customer to take control of their behavior by setting limits and self-excluding if necessary. While there is debate amongst stakeholders on whether cashless wagering systems can play a role in prevention, **there is no doubt that anonymity defeats any benefit to the at-risk customer** by eliminating any possibility of the meaningful deployment of responsible gaming tools to the patron. Sightline Payments does not support any amendment to the Nevada gaming regulations that would allow for patrons to anonymously wager without cash directly at a gaming device or table game.

Once a patron is "known" and an account created for that patron, responsible gaming tools can and should be made available, such as;

- Voluntary self-exclusion
- Self-imposed temporary or permanent account closing or suspension
- Self-imposed daily/weekly/monthly funding restriction tools
- Artificial time delays on funding
- Spending visualization tools
- Other best practices tools recommended by responsible gaming organizations, such as the Nevada Council on Problem Gambling and the National Council on Problem Gambling

Sightline Payments respectfully requests that the Nevada Gaming Control Board and the Nevada Gaming Commission consider hosting a workshop to address payments modernization and best practices to address cashless wagering, anti-money laundering compliance and responsible gaming.

Very truly yours,

HOWARD & HOWARD ATTORNEYS PLLC



Jennifer L. Carleton

ABOUT SIGHTLINE PAYMENTS, LLC

Sightline is delivering integrated resort operators and platform providers the next generation of cashless, mobile, and omni-channel commerce solutions. Play+ is an award-winning and patented digital commerce platform for cashless integrated resort operators and is a responsible, faster, safer, and more convenient alternative for guests to use their mobile device. With Play+ casino resorts can offer a total entertainment experience for hospitality, online/mobile gaming, on premise gaming, and sports betting and guests no longer need to be inconvenienced with using cash or waiting in lines.

ⁱ Federal Deposit Insurance Corporation

ⁱⁱ Office of the Comptroller of the Currency

ⁱⁱⁱ Financial Crimes Enforcement Network

^{iv} Federal Financial Institutions Examination Council

^v Consumer Financial Protection Bureau



3883 HOWARD HUGHES PARKWAY, SUITE 800
LAS VEGAS, NV 89169
TELEPHONE: (702) 550-4400
FACSIMILE: (844) 670-6009
<http://www.dickinsonwright.com>

KATE C. LOWENHAR-FISHER
KLOWENHAR-FISHER@DICKINSONWRIGHT.COM
(702) 550-4459

June 24, 2020

VIA E-MAIL

Nevada Gaming Commission
1919 College Parkway
Carson City, NV 89706
mbell@gcv.nv.gov

Re: 2020-03R

Dear Commission Members:

Please accept this letter as the written comments of Crane Payment Innovations, Inc. (“CPI”) regarding the proposed amendments to NGC Regulation 14 that are under consideration by the Nevada Gaming Commission for its meeting on June 25th.

Historically, CPI and its affiliates have been primarily focused on the banking industry. However, gaming has become a very important industry in recent years because the gaming industry’s needs have begun to parallel the needs of the regulated banking industry and other financial institutions.

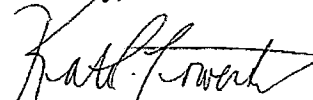
In Nevada, CPI is a registered manufacturer of associated equipment and currently provides currency counting equipment and systems to licensed gaming operators and gaming device manufacturers. Outside of Nevada, CPI provides licensed gaming operators and gaming device manufacturers with card readers, software applications, and telemeters, all of which are compatible with major debit cards that meet or exceed all Payment Card Industry – PIN Transaction Security Requirements (“PCI-PTS”).

As a registered manufacturer of associated equipment, CPI is encouraged by the opportunity to provide cashless wagering system manufacturers with CPI components. CPI also looks forward to any opportunity to work with Nevada regulators regarding any revisions to cashless wagering system technology standards for equipment that may incorporate the PCI-PTS standards and require compliance with NRS 603A.215(1) regarding payment card processing in Nevada.

We applaud the hard work and alacrity of the Nevada regulators and regulatory staff to expedite the move toward broader adoption of cashless wagering transactions.

Thank you for your time and consideration.

Sincerely,


Kate C. Lowenhar-Fisher

KCL:jac

Public Comment received from Aristocrat Technologies, Inc. on June 19, 2020

Please consider the following comments from Aristocrat Technologies, Inc. regarding the proposed amendments to Nevada Gaming Commission regulations 1 and 14 regarding, without limitation, electronic transfers of money to a game or gaming device during the June 25th hearing.

- 1) The proposed 14.265 addition says “from a financial institution directly or indirectly to a game or gaming device . . .”. Any clarification regarding the difference between directly and indirectly would be helpful.
- 2) It appears as though wagering accounts may not be required by these proposed changes. The AGEM letter regarding this proposed change says “The regulation change also allows for, but does not compel, a wagering account interface, and thereby permits for innovative applications.” Any clarification on whether this interpretation is correct would be appreciated.

FENNEMORE CRAIG
ATTORNEYS

Dan R. Reaser
dreaser@fclaw.com

300 E. Second Street, Suite 1510
Reno, NV 89501
PH (775) 788-2226 | FX (775) 788-2227
fennemorecraig.com

June 16, 2020

ELECTRONIC & U.S. MAIL

John T. Moran, Jr., Acting Chairman
NEVADA GAMING COMMISSION
1919 East College Parkway
Carson City, Nevada 89706
regcomments@gcb.nv.gov

Re: **2020-32 & 2020-33 -- NOTICE OF HEARINGS:**
AMENDMENTS TO NEVADA GAMING COMMISSION REGULATIONS 1 AND 14;
Association of Gaming Equipment Manufacturers' Comments

Dear Acting Chairman Moran:

We represent the Association of Gaming Equipment Manufactures ("**AGEM**" or the "**Association**"). AGEM is a non-profit international trade association with a membership of 181 companies representing manufacturers of electronic gaming devices, systems, table games, on-line technology, key components and associated equipment and services for the regulated gaming industry. One of the Association's missions is to work with agencies such as the Nevada Gaming Commission (the "**Commission**"), and Nevada Gaming Control Board (the "**Board**"), to ensure that the regulatory systems governing the manufacture and distribution of gaming devices protect the valuable reputation of the gaming industry while fostering an environment for technological innovation. In that context, AGEM is submitting this comment letter.

Specifically, this letter is further to the Notices of Hearing Nos. 2020-32 and 2020-33 in Matter No. 2020-03R and Matter No. 2020-02R (the "**Notices**"), regarding proposed rule modifications prepared by the Board, and dated May 22, 2020, and March 20, 2020, respectively (the "**Proposed Regulations**"). The Association respectfully submits these comments supporting the adoption of the Proposed Regulations.

1. Comments On Notice No. 2020-32. The Association endorses the two primary objectives of this rulemaking. The first regulation change provides flexibility to licensed manufacturers in the means and manner of submitting program source code.

FENNEMORE CRAIG

John T. Moran, Jr., Acting Chairman

NEVADA GAMING COMMISSION

June 16, 2020

Page 2

This change in law allows for technological advances for these submissions, and empowers the Board to exercise discretion in accepting alternative forms of source code media. Although Proposed Regulation 14.030(5) and Proposed Regulation 14.110(3)(c)(1) confer on the Board Chair exceedingly broad discretionary authority, AGEM considers the review process governing administrative approval decisions set forth in Nevada Gaming Commission Regulations 4.185 through 4.195 as an adequate mechanism to protect against the imposition of potentially expensive or unduly burdensome alternative requirements on new or modified game approval submissions.

Second, AGEM also views as a positive development, the rule changes in Proposed Regulation 14.080(2)(b) and Proposed Regulation 14.130(2)(b). These regulation modifications embrace continued refinements to the New Innovation Beta fast-track submission procedures which the Board and Commission recognize as necessary to improve time to market for gaming technology products. Notably, these changes expand the authority of the Board Chair to craft flexible and inventive terms and conditions that may be imposed on game field tests and extends these procedures to inter-casino linked systems. The revisions also prescribe a presumption that these field tests will not exceed 270 days in duration unless needed for a new game to receive Board and Commission approval agenda consideration. As noted above, even though the discretion conferred on the Board Chair is quite extensive, the Commission's existing oversight of administrative action provides an adequate procedural safety-valve.

2. Comments On Notice No. 2020-33. AGEM applauds the goal of this rulemaking which is to further embrace technologies that facilitate transfers of money to games and gaming devices subject to the continuing statutory prohibition under NRS 463.3557. Proposed Regulation 14.265 allowing for direct and indirect transfers by debit instruments of money from a financial institution to a game or gaming device through a cashless wagering system approved by the Board Chair is a logical next step for that purpose. The Association considers the flexibility of administrative approval by the Board Chair of particular technologies important because it prevents immediately erecting regulatory standards that might be driven by a particular platform or technology. The regulation change also allows for, but does not compel, a wagering account interface, and thereby permits for innovative applications.

FENNEMORE CRAIG

John T. Moran, Jr., Acting Chairman

NEVADA GAMING COMMISSION


June 16, 2020

Page 3

As we collectively experienced over a decade ago with ticket-in/ticket-out technologies, driving the gaming environment toward a cashless environment will have profoundly positive impacts. These outcomes range from enhanced legal compliance, improved public health and safety especially given the COVID-19 pandemic, as well as more robust responsible gaming alternatives and advanced operating efficiencies. AGEM supports this and similar future initiatives that propel the industry forward in embracing the gaming experience of the future.

Thank you for the opportunity to share AGEM's viewpoints on these regulation amendments. Should you have any questions, or require additional information, please advise.

Sincerely,

A handwritten signature in black ink that reads "Dan R. Reaser". The signature is written in a cursive, slightly slanted style.

Dan R. Reaser

cc: Members, Nevada Gaming Control Board
Marcus Prater, AGEM Exec. Dir.



UAW LOCAL 3555
4310 CAMERON STREET SUITE 11
LAS VEGAS, NV 89103
702-800-4744

06/22/2020

Electronic & U.S.Mail

John T. Moran, Jr., Acting Chairman
NEVADA GAMING COMMISSION
1919 East College Parkway
Carson city, Nevada 89706
regcomments@gcb.nv.gov

Re: 2020-32& 2020-33—Notice of Hearings:
Amendments to Nevada Gaming Commission Regulations 1 and 14;
Association of Gaming Equipment Manufacturers' Comments

Dear Acting Chairman Moran:

I am an elected representative of UAW Gaming Local 3555 and we represent the UAW Gaming Union in Las Vegas Nevada. UAW Gaming is a non-profit organization and currently representing approximately three thousand members (Dealers, Slots, Cage and Count Team) at several different casinos. One of our missions is to work with agencies such as the Nevada Gaming Commission (the "Commission"), and Nevada Gaming Control Board (the "Board"), to ensure that the regulatory systems governing cashless wagering and Electronic funds of transfer to gaming devices.

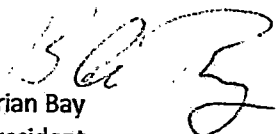
We have concerns with the negative implications of cashless wagering and electronic transfers of money using a debit instrument to a game or gaming device.

1. Responsible gaming - We feel this will lead to irresponsible gaming, with unlimited access to electronic funds. Possible law suits from over spending due to intoxication or addictions.
2. Fraud and Hackers - A possibility of a security breach is always present.
3. Job Loss - Thousands of gaming workers would potentially be laid off or terminated. This could lead to a strain on state resources.
4. Reduced Tip Income - Many of the workers in the gaming industry earn the majority of their money through tips. Electronic cash transfers could potentially and significantly reduce tip income thus reducing the spending of the workers and lowering tax revenues.

Specially, the Gaming Union Local 3555 is voicing an opinion against the approval of Cashless wagering and Electronic transfers of money using a debit instrument to a game or gaming device.

Also, UAW Gaming Local 3555 respectfully requests more time for full disclosure of effects should the changes be approved without commission having an appointed Chair, and to further allow detailed review by public and AFL labor affiliates regarding possible negative effects on local jobs, fraud, any revenues to local agencies and responsible gambling assistance supported by Nevada's legislative guidelines.

Respectfully,



Brian Bay
President
UAW Local 3555
bbay.uawlasvegas@gmail.com

24 June 2020

To the Members
Nevada Gaming Commission
Via email

Dear Commissioners:

I write both in my capacity at the International Gaming Institute where I serve as Distinguished Fellow in Responsible Gaming, but also as Chair of the Nevada's Advisory Commission on Problem Gambling. The Advisory Committee on Problem Gambling is empowered to provide advice and oversee research and services concerning problem gambling for the state of Nevada and any of its agencies. In this regard, I respectfully submit these comments in hopes of supporting your efforts to successfully implement cashless wagering standards and regulations in wagering in Nevada.

As our state confronts the health and safety issues of reopening, we must recognize that during these unprecedented times, experiences that have traditionally been known to contribute to problem gambling may have been experienced by many returning customers, such as isolation, loss of income, loss of a loved one, or unemployment. These experiences may contribute to customers using gambling as an escape from the stress of the pandemic or as an attempt to recoup lost income.

Our economic recovery should not include placing anyone in harm's way.

There are clear and obvious benefits associated with cashless payment systems, the most important of which are enhanced spend tracking and record-keeping as well as enhanced KYC and AML benefits. There are also critically important benefits from a responsible gaming perspective

Many of the companies developing cashless payment technologies have already developed impressive player protection features, all of which should be standard requirements of any approved system in Nevada. These include, but are not limited to:

- Voluntary self-exclusion
- Self-imposed temporary or permanent account closing or suspension
- Self-imposed daily/weekly/monthly funding restriction tools
- Artificial time delays on funding
- Spending visualization tools

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In order to fully realize the important benefits of cashless payment systems in Nevada including enhanced player protection, I strongly urge that the following provisions be included in the final regulations, standards or guidelines:

- **Registration** – The enhanced benefits of cashless systems, particularly as it relates to KYC, AML and Responsible Gaming are wiped away if registration is not required prior to a customer engaging in a cashless transaction. Anonymity serves no good purpose. Registration accomplishes several objectives and is entirely consistent with practice and policy. It must be made explicitly clear in regulation that every player must be registered and identified before engaging in cashless transactions to fund accounts in order to gamble.
- **Exclusion** - While Nevada does not have an exclusion program requirement in its regulations, individual operators and/or transaction technology providers must have this capability and it must be made available to customers if they are to provide cashless funding options to customers. It is a critically important player protection tool, the technology exists, and it is simple and inexpensive to manage
- **Research** - Just as the ACPG provides funding for vital research on the impacts of the PG treatments services we fund, we must also advocate that research be done on cashless activity. The GCB should mandate that technology providers AND gaming operators provide anonymized data to an accredited third-party academic institution for annual evaluation and report. It's fine if this provision sunsets in 5 years, but at least by then we'll have some idea as to what impacts will exist from this activity - good, bad or neutral. (While I'd obviously love for this to be UNLV, it simply must be done by someone legitimate.)
- **Responsibility** - The Nevada Gaming Commission and Control Board are in a unique position to specify responsibility for all activities. It should be the technology providers' responsibility to build player protection tools into their programs and it must be the operators' responsibility to provide those tools to patrons. It does no good for the tools to exist, but no one turns them on and makes them available to customers.

As the industry seeks to recover from the COVID pandemic, enhanced health and safety measures are critical in order to build a sense of confidence among customers. Among these, the State must consider measures to provide player protections and encourage safe use of any technology in our gaming environment.

This entire topic would lend itself perfectly to a workshop so that a wide variety of voices can weigh in on the issues I've raised as well as the many operational and technical issues that need to be addressed. Both I and my colleagues at UNLV, as well as the members of the ACPG, would welcome an opportunity to participate in such a workshop.

In the meantime, I would be happy to provide you with any additional detail or information as needed.

Thank you for your consideration.

A handwritten signature in black ink, appearing to read 'A. Feldman', with a long horizontal flourish extending to the right.

Alan M. Feldman
Distinguished Fellow
Responsible Gaming