

Nevada Gaming Commission Presentation—Regulation 4A—October 24, 2019

Fred Voltz representing Animal Wellness Action, the Humane Society of the United States, No Bear Hunt Nevada and the Nevada Wildlife Alliance. We support Regulation 4A's Section .040's age restrictions without carving out inappropriate exemptions for any organization.

While proposed Regulation 4A addresses qualified charities and qualified professional sports organizations staging charitable lotteries and games, it is silent about lotteries, Calcutta betting and other gaming activities that regularly occur with wildlife killing contests not sponsored by either group.

You will find some of our concerns about gaming contests lacking appropriate regulatory oversight in our October 17th letter in today's package. We will add further facts and a regulation change today.

The GCB's Records' Custodian confirmed there are no formal GC/GCB policies and procedures for regulation and enforcement of gaming as a frequent component of Nevada wildlife killing contests. The almost 48-year old gaming policy transcript and the 42-year old informal Attorney General position have not been memorialized in formal procedures for consistent and complete application.

Presently, the GCB does not require any type of sponsor pre-registration for such contest gaming activities and conducts no post-event compliance review of the sources and uses of funding. The GCB has no internal mechanism and exerts no effort to learn when these events will occur. It is only if a member of the public alerts the GCB that it conducts a cursory and informal phone inquiry.

Multiple contacts with GCB management over several years including the former chair, Mr. Burnett, have been dismissively handled. Their collective lack of interest in enforcing Nevada gaming law pertaining to wildlife killing contests is concerning. We need a formal oversight process to discover what gaming will and has occurred at these contests. Without oversight, there is no inherent knowledge whether a 'rake' exists, that is, the operator receiving a percentage of the money staked based on the outcome of the event.

Wildlife killing contests with Calcutta betting and other gaming contests/lotteries are deemed 'sporting events' by the sponsors and fall under the guidelines of NRS 464 to obtain a lottery gaming license or are categorized as pari-mutuel betting. Contest participants are self-described sportsmen.

Since wildlife killing contests with gaming don't explicitly fall under NRS 462, 463 or 464, then where are they covered?

Our suggestion in correcting this obvious lack of gaming oversight would be to enhance Regulation 4A's language to include wildlife killing contests under 4A's proposed registration and application fee construct and apply the same guidelines as if they were qualified professional sporting organizations.