

April 4, 2014

To: the Members of the New York State Gaming Commission

From: Stephen Q. Shafer MD, MA, MPH, Chairperson, Coalition Against Gambling in NY

Please remember at the forum an over-arching issue that is not likely to be brought up by any speaker there, none of whom will identify himself or herself as more opposed to government-sanctioned predatory gambling than to be “neutral” on it. The Commission really ought to hear not only from this established sector but also from opponents of predatory gambling, who are not neutral. There are two sides to most questions, and “neutral” is not a side.

The issue is described in the attached short handout: *potent regulation to prevent problem gambling would reduce casino revenues to an extent very unattractive to profit-based interests.* This knockdown would also lower revenue to government, posing government-appointed regulators not just a potential, but an actual conflict of interest.

When the idea of the forum was put forward last month, I e-mailed the Commission’s staff asking to take part. Since no invitation came, I request that you consider throughout the day the “Two Statistics” text attached. These two statistics should be the keynote of the whole program, not an un-acknowledged elephant in the bedroom.

The April 9 conference is focused on what applicants should say they will do. The Commission has a duty beyond that, to evaluate going forward the real impact of the licensees’ proposals. This will require a formal epidemiological study of gambling behaviors in New York State. Counts of persons self-excluded or of calls to hot lines or of clients in publicly-funded treatment programs will not be an adequate basis. The Commission, as I recommended in a letter to the members earlier this year, will have to seek funding for this study. The Upstate Gaming Economic Development Act of 2013 made no provision for it. This must be remedied by the legislature at the behest of the Gaming Commission.

Thank you for your attention.

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