



**MASSACHUSETTS GAMING COMMISSION
PUBLIC MEETING #209**

February 2, 2017
10:00 a.m.

Massachusetts Gaming Commission
101 Federal Street, 12th Floor
Boston, MA



Massachusetts Gaming Commission



**NOTICE OF MEETING and AGENDA
February 2, 2017**

Pursuant to the Massachusetts Open Meeting Law, G.L. c. 30A, §§ 18-25, notice is hereby given of a meeting of the Massachusetts Gaming Commission. The meeting will take place:

**Thursday, February 2, 2017
10:00 a.m.
Massachusetts Gaming Commission
101 Federal Street, 12th Floor
Boston, MA**

PUBLIC MEETING - #209

1. Call to order
2. Approval of Minutes
 - a. January 19, 2017 – **VOTE**
3. Research and Responsible Gaming – Mark Vander Linden, Director
 - a. Baseline Online Panel Survey Report - Rachel Volberg, Ph.D. SEIGMA Principal Investigator, UMass Amherst – School of Public Health
4. Administrative Update – Ed Bedrosian, Executive Director
 - a. General Update
 - b. 205 CMR 139.09: Plainridge Park Casino Capital Investment Plan – C. Blue, General Counsel - **VOTE**
5. Investigations and Enforcement Division – Karen Wells, Director
 - a. Table Games Rules Memo Discussion Continued – B. Band, Gaming Agents Division Chief and C. Blue, General Counsel
 - b. 205 CMR 152: Exclusion List Regulations – L. Lillios, Chief Enforcement Counselor
 - c. Gaming Equipment Regulations Memo Discussion – B. Band, Gaming Agents Division Chief, B. Cain, Senior Supervising Gaming Agent and T. Grossman, Deputy General Counsel
 - d. MGM Qualifiers Suitability Decisions – **VOTE**



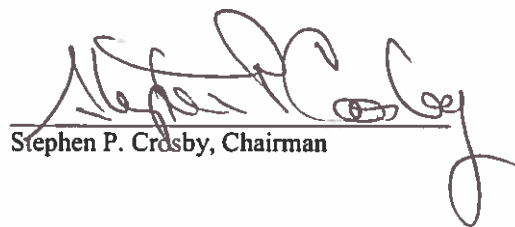
Massachusetts Gaming Commission

6. Commissioner's Updates

7. Other business – reserved for matters the Chair did not reasonably anticipate at the time of posting.

I certify that on this date, this Notice was posted as “Massachusetts Gaming Commission Meeting” at www.massgaming.com and emailed to: regs@sec.state.ma.us, melissa.andrade@state.ma.us.

1/31/17
DATE



Stephen P. Crosby, Chairman

Date Posted to Website: January 31, 2017 at 10:00 a.m.



Massachusetts Gaming Commission

101 Federal Street, 12th Floor, Boston, Massachusetts 02110 | TEL 617.979.8400 | FAX 617.725.0258 | www.massgaming.com



Meeting Minutes

Date/Time: January 19, 2017 – 10:00 a.m.

Place: Massachusetts Gaming Commission
101 Federal Street, 12th Floor
Boston, Massachusetts

Present: Chairman Stephen P. Crosby
Commissioner Gayle Cameron
Commissioner Lloyd Macdonald
Commissioner Bruce Stebbins
Commissioner Enrique Zuniga

**Time entries are linked to
corresponding section in
Commission meeting video**

Call to Order

See transcript page 2

[10:01 a.m.](#) Chairman Crosby called to order the 208th Commission meeting.

Approval of Minutes

See transcript pages 2-4

[10:02 a.m.](#) *Commissioner Macdonald moved for the approval of the January 5, 2017 Commission meeting minutes subject to any corrections, typographical errors, or other nonmaterial matters. Motion seconded by Commissioner Cameron. Motion passed unanimously.*

Chairman Crosby inquired about the table games rules and General Counsel Catherine Blue responded that they'll be on for the next Commission meeting. Chairman Crosby inquired about the PlayMyWay schedule and Executive Director Bedrosian responded that they are working on it.

Research and Responsible Gaming

See transcript pages 4-59

[10:03 a.m.](#) Director Mark Vander Linden stated that the Expanded Gaming Act seeks to protect the lottery from adverse impacts due to casino gaming. He stated that he is joined by Dr. Rachel Volberg and Dr. Mark Nichols (via telephone) to present on the 12-

month lottery analysis. The study presented today is an analysis of the lottery sales before and after Plainridge Park Casino opened in 2015. Director Vander Linden stated that the collaboration with the Lottery is unprecedented and access to the lottery data has been instrumental to conduct the study being presented today.

Dr. Mark Nichols, Professor and Director of Economics Graduate Programs at the University of Nevada at Reno, provided a summary of the 12 month lottery analysis and key findings. Dr. Nichols concluded that lottery revenues at Plainridge Park Casino grew significantly and there was no adverse impact on lottery revenues statewide or near the casino. He stated that they will continue to gather data and analyze it.

Michael Sweeney, Executive Director of the Massachusetts State Lottery, thanked the Commission for the work they are doing and stated that the University of Massachusetts and Dr. Nichols have been great partners to work with. He noted that fluctuations of lottery sales can occur for a number of reasons and it is difficult to quantify without a deeper dive into each agent and area. He also stated that Plainridge Park Casino has been a great partner and the lottery products have been well received by the casino patrons. He stated that the research was great and he is cautiously optimistic that this trend will continue.

Dr. Volberg noted that the lottery study will be available on the SEIGMA (Social and Economic Impacts of Gambling in Massachusetts) website.

11:07 a.m. The Commission took a brief recess.

11:16 a.m. The meeting resumed.

Administrative Update

See transcript pages 60-72

[11:16 a.m.](#) Executive Director Edward Bedrosian, Jr. introduced a new employee – Nowshin Jahan, a Financial Investigator in the Investigations and Enforcement Bureau.

[11:18 a.m.](#) CFAO Derek Lennon provided a 2nd Quarter Fiscal Year 2017 budget update which included assessments, projections and spending.

Legal Division

See transcript pages 72-117

[11:28 a.m.](#) Executive Director Bedrosian requested to advance agenda item 7a (Plainridge Park Casino Capital Investment Plan) due to out of town guests. Executive Director Bedrosian stated that our licensees are required to develop a plan to make capital reinvestments in their properties. He stated that Penn National has submitted a \$9.15 million multi-year plan that complies with the statutory and regulatory obligations. He recommended that the plan be approved with stipulations.

Executive Director Bedrosian also noted that MGM made a request for a review of the capital expenditure regulation. He stated that the Commission may have enough information to direct staff to take this on now or give our licensees the option for an annual regulatory review.

- [11:34 a.m.](#) Deputy General Counsel Todd Grossman provided a summary of the provisions of the governing law pertaining to the capital expenditure plan. Mr. Grossman stated that the Plainridge Park Casino plan is sufficient and meets the statutory and regulatory requirements.
- [11:55 a.m.](#) Carl Sottosanti, General Counsel of Penn National Gaming Inc., stated that although there is ambiguity about the capital expenditure rules there is no ambiguity for Penn about the objective of the statute. He stated that they want a facility that will attract more patrons in what will be a competitive market. He stated that their plan has been thoughtfully developed and Penn has the expertise to keep properties looking new. He stated that they are open to the stipulations suggested by Executive Director Bedrosian and scrutiny by the Commission. He stated that their plan sets forth several paths and they submit it to the Commission for approval.
- [12:13 p.m.](#) Executive Director Bedrosian suggested that if the Commissioners find this plan acceptable he will direct Deputy General Counsel Grossman to draft a motion for the next Commission meeting.
- [12:17 p.m.](#) Chairman Crosby suggested advancing agenda items 6a (Non-Gaming Vendor Registration) and 6b (Service Employees Registration) due to guest that are present.
- 12:18 p.m. The Commission took a brief recess.
12:21 p.m. The meeting resumed.

Investigations and Enforcement Bureau (IEB)

See transcript pages 117-188

- [12:21 p.m.](#) Chairman Crosby requested a review of the licensing and registration requirements for non-gaming vendors and employees. Director Karen Wells reported on a jurisdictional comparison chart that was prepared by consultants Michael and Carrol pertaining to the registration of non-gaming vendors and non-gaming employees. She stated that Michael and Carroll noted that any major changes made in the jurisdictions were implemented by statutory revision. The Commissioners discussed the 10 year felony/employment disqualification matter and ambiguity of sections 16B and 30F (M.G.L. c. 23K). Director Wells presented on some concerns she has and options for the Commission to consider.

Chairman Crosby stated that he would like to see a formal review of the regulation on the agenda. Commissioner Cameron stated that we need to direct staff to continue to explore some of these options. Commissioner Macdonald suggested that we ask the legal department to address this issue, solicit input from our licensees and others, and put on this matter on the agenda within the next four to six weeks. Commissioner Cameron suggested including the entire staff for input. Chairman Crosby suggested that we focus on gaming service employees since it's complicated and we already made a step on the nongaming vendor matter with the \$10,000 de minimus exemption.

- [1:32 p.m.](#) Director Wells presented on the results of the suitability investigation for a Key Gaming Employee –Executive, Rubin Warren, who is the Vice President of Finance at Plainridge Park Casino. She reported that an investigation was conducted by the

IEB and she provided a summary of his educational and professional background. She stated that the IEB recommends that the Commission find him suitable.

[1:35 p.m.](#) *Commissioner Stebbins moved that the Commission approve Rubin Warren, Vice President of Finance at Plainridge Park Casino, for suitability as a key gaming employee. Motion seconded by Commissioner Macdonald. Motion passed unanimously.*

Racing Division

See transcript pages 188-193

[1:36 p.m.](#) Douglas O'Donnell, Senior Financial Analyst, presented on a request for reimbursement by Suffolk Downs from the Capital Improvement Trust Fund. He stated that the project was for dormitory repairs totaling \$75,882.75.

[1:37 p.m.](#) *Commissioner Stebbins moved that the Commission approve the request for reimbursement by Suffolk from the Suffolk Downs Capital Improvement Trust Fund for \$75,882.75. Motion seconded by Commissioner Macdonald. Motion passed unanimously.*

[1:37 p.m.](#) Mr. O'Donnell presented on a request for reimbursement by Suffolk Downs from the Capital Improvement Trust Fund. He stated that there are seven projects totaling \$140,988.24.

[1:38 p.m.](#) *Commissioner Stebbins moved that the Commission approve the Suffolk Downs Capital Improvement Trust Fund request for consideration of the items presented in our packet, for a total request of \$140,988.24. Motion seconded by Commissioner Cameron. Motion passed unanimously.*

Legal Division

See transcript pages 193-217

[1:40 p.m.](#) General Counsel Catherine Blue stated that the amendments to regulations 205 CMR 138, 205 CMR 144, and 205 CMR 145 have gone through the promulgation process and a public hearing. She noted that the final draft and amended small business impact statement are in the packet. Deputy General Counsel Grossman stated that the amendments generally pertain to the approval of slot machines and other electronic gaming devices. He stated that we received and incorporated a number of comments. He provided highlights of the changes and noted that the draft was a collaborative effort between the gaming technology group and the IEB.

[2:03 p.m.](#) *Commissioner Macdonald moved that the Commission approve the amended small business impact statement and amended regulations to 205 CMR 138.00, 205 CMR 144.00, and 205 CMR 145.00. Motion seconded by Commissioner Cameron. Motion passed unanimously.*

Commissioner's Update

See transcript pages 217-219

2:03 p.m. Chairman Crosby noted that Justin Stempeck and Paul Connolly did a great job presenting at the Online Gaming Commission meeting. He stated that they moved the conversation from DFS to online gaming. Chairman Crosby also noted that this committee could create an environment for innovation in our software industry.

Other Business Not Reasonably Anticipated

See transcript page 219-220

2:06 p.m. *Having no further business, a motion to adjourn was made by Commissioner Zuniga. Motion seconded by Commissioner Macdonald. Motion passed unanimously.*

List of Documents and Other Items Used

1. Massachusetts Gaming Commission, Notice of Meeting and Agenda dated January 19, 2017
2. Massachusetts Gaming Commission, Draft Meeting Minutes dated January 5, 2017
3. SEIGMA (Social and Economic Impacts of Gambling in Massachusetts), Lottery Revenue and Plainridge Park Casino: First Year of Casino Operation, report by Dr. Mark Nichols, University of Nevada (Reno), dated January 19, 2017
4. Massachusetts Gaming Commission, Memorandum dated January 19, 2017 regarding Fiscal Year 2017 (FY17) Second Budget Update, with attachments
5. Massachusetts Gaming Commission, Racing Division, Memorandum dated January 19, 2017 regarding (\$75,882.75) Request for Reimbursement, Suffolk Downs Capital Improvement Trust Fund, with attachment
6. Massachusetts Gaming Commission, Racing Division, Memorandum dated January 19, 2017 regarding (\$140,998.24) Request for Reimbursement, Suffolk Downs Capital Improvement Trust Fund, with attachments
7. Non-Gaming Employees and Non-Gaming Vendors State Comparison Chart, Michael and Carroll, LLC
8. Letter from Unite Here Local 26 to Chairman Stephen Crosby, dated January 17, 2017 Regarding CORI record and the screening process for casino service employees
9. Letter from MGM Springfield to Chairman Stephen Crosby, dated January 15, 2017 regarding Capital Expenditure Plans
10. Letter from Penn National to Executive Director Edward Bedrosian, dated January 16, 2017 regarding Capital Expenditure Plan, with attachments
11. Amended Small Business Impact Statement, Final Drafts, and Public Comments for:
205 CMR 138.00: Uniform Standards of Accounting Procedures and Internal Controls,
205 CMR 144.00: Approval of Slot Machines and Electronic Gaming Equipment and Testing Laboratories, and
205 CMR 145.00: Possession of Slot Machines

/s/ Catherine Blue
Catherine Blue, Assistant Secretary

Impacts of Gambling in Massachusetts: Results of a Baseline Online Panel Survey (BOPS)

Robert Williams, Penny Pekow, Rachel Volberg,
Ed Stanek, Martha Zorn, Amanda Houpt

February 2, 2017

Baseline General Population Survey

- Our 2013/2014 Baseline General Population Survey (n = 9,578) projected to contain only 96 – 192 problem gamblers (1 - 2%) (129 actually obtained)
- Sufficient to determine prevalence of problem gambling, their basic demographic profile, and statistical predictors of problem gambling.
- Insufficient to have finer-grained understanding of problem gamblers in terms of
 - Prevalence of negative personal impacts (e.g., bankruptcy, suicidal thoughts, divorce)
 - Differential impact of different types of gambling on these negative impacts
 - Prevention awareness and treatment seeking behavior
 - How these indices change subsequent to casino introduction

Baseline Online Panel Survey

- Needed to increase our sample of problem gamblers
- Prohibitively expensive to do with the Baseline General Population Survey, but could be accomplished with a relatively low cost supplemental Online Panel Survey
- ***This was the purpose of the Baseline Online Panel Survey***

Online Panels

- Online Panels consist of thousands of people recruited to do online surveys in return for compensation
- Relatively low cost, quick turn-around time, everyone has agreed to be contacted, and validity of sensitive questions higher in self-administered formats
- While demographically representative, not representative in other respects:
 - Does not include non-Internet users (being addressed with smart phone surveys)
 - Majority of panelists have opted-in, rather than been randomly selected
 - Probably because of opt-in recruitment, panelists have **significant higher rates of pathology** (including problem gambling)

Baseline Online Panel Survey

- Our *Research Plan* projected a ~6% prevalence rate of problem gambling with a Massachusetts online panel
- With a sample of 5,000, this would identify an additional 300 problem gamblers

Method

- Conducted by Ipsos
- Oct 2013 – Mar 2014 (survey ran coincident with the BGPS)
- Obtained sample of 5,046 with **317 problem gamblers** (6.4%)
- Weighting via iterative raking to adjust the sample to demographically align it with MA population in terms of region x age, region x gender, region x race/ethnicity, age x gender, age x race/ethnicity, age x education, gender x race/ethnicity, gender x education, and race/ethnicity x education.

Method

- Are BOPS problem gamblers different from BGPS problem gamblers?
- If not, samples could be combined, if different, samples need to be analyzed separately
- Multivariate analysis (logistic regression) found modest, but significant differences between BGPS and BOPS problem gamblers on a subset of 5 variables. BOPS problem gamblers were:
 - less likely to be immigrants; younger; less likely to come from Western Massachusetts; greater engagement in extreme sports; greater tobacco use
- Samples *not* combined, results reported separately

Baseline Negative Impacts of Gambling in Massachusetts

Baseline Negative Financial Impacts

- **Financial problems** most commonly reported negative impact of gambling
 - Gamblers: 3.8%
 - Problem Gamblers: 48.0% (BGPS) – 54.2% (BOPS)
- **Bankruptcy** because of gambling
 - Problem Gamblers: 5.2% (BOPS)
 - Projects to ~5,500 bankruptcies per year

Baseline Negative Health Impacts

- **Health and Stress-Related problems** because of gambling almost as common
 - Gamblers: 3.8%
 - Problem Gamblers: 47.7% (BGPS) - 49.6% (BOPS)
- **Gambling-related health or mental health problems resulted in seeking medical or psychological help**
 - Problem Gamblers: 3.9% (BGPS) - 8.7% (BOPS)
 - ~4,100 – 9,200 people

Baseline Negative Mental Health Impacts

- **Significant guilt, anxiety, or depression** because of gambling
 - Gamblers: 3.2%
 - Problem Gamblers: 31.4% (BOPS) - 36.5% (BGPS)
- **Suicidal thoughts** because of gambling
 - Problem Gamblers: 4.4% (BOPS)
 - ~4,600 people
- **Suicide attempts** because of gambling
 - Problem Gamblers: rare (1 BGPS & 10 BOPS)

Baseline Relationship Impacts

- **Relationship Problems** because of gambling
 - Gamblers: 1.1%
 - Problem Gamblers: 13.7% (BOPS) - 18.8% (BGPS)
- **Neglect of children or family** because of gambling
 - Problem Gamblers: 9.1% (BOPS); ~9,600 people
- **Domestic Violence** because of gambling
 - Problem Gamblers: 5.2% (BOPS); ~5,500 people
- **Separation or Divorce** because of gambling
 - Problem Gamblers: 3.7% (BOPS); ~3,900 people
- **Child Welfare Services Involvement** because of gambling
 - Problem Gamblers: rare (0 BGPS & 11 BOPS)

Baseline Work or School Impacts

- **Work or School Problems** because of gambling
 - Gamblers: rare
 - Problem Gamblers: 9.3% (BOPS); ~9,800 people
- **Lost job or quit school** because of gambling
 - Problem Gamblers: rare (3 BGPS & 10 BOPS)
- **Received Public Assistance or Welfare Payments** because of gambling
 - Problem Gamblers: rare (2 BGPS & 10 BOPS)

Baseline Illegal Activity Impacts

- **Committed Illegal Acts** because of gambling
 - Gamblers: 0.5%; ~11,500 people
 - Problem Gamblers: 8.4% (BOPS); ~5,800 people
- **Arrested** because of gambling
 - Problem Gamblers: rare (2 BGPS & 10 BOPS)
- **Convicted** of offense because of gambling
 - Problem Gamblers: rare (0 BGPS & 6 BOPS)
- **Incarcerated** because of gambling
 - Problem Gamblers: rare (0 BGPS & 6 BOPS)

Baseline Impacts of Different Types of Gambling on Gambling-Related Problems

Impacts of Different Types of Gambling

- Only minority of problem gamblers reported that certain type of gambling contributed to their problems more than others: 29.8% BGPS & 26.6% BOPS
- For those that did report this, low numbers precluded reliable estimates of relative importance of each type, with exception of *instant lotteries* (most problematic type for 23.1% of BOPS problem gamblers)
- *Every* type had some endorsement
- This diverges from most research which finds higher endorsement for electronic gambling machines, table games, and online gambling

Baseline Prevention Awareness & Treatment Seeking of Problem Gamblers in Massachusetts

Prevention Awareness & Treatment Seeking

- **Heard or seen media campaigns to prevent problem gambling in Massachusetts:**
 - Gamblers: 49.8%
 - Problem Gamblers: 47.4% (BOPS) - 50.0% (BGPS)
- **Aware of programs to prevent problem gambling at work, school, or in community**
 - Gamblers: 16.3%
 - Problem Gamblers: 25.0% (BGPS) – 31.8% (BOPS)
- **These media campaigns or programs altered gambling behavior**
 - Gamblers: 1.2%
 - Problem Gamblers: 7.6% (BOPS)

Prevention Awareness & Treatment Seeking

- **Wanted help for gambling problems**
 - Problem Gamblers: 25.4% (BOPS)
- **Sought help for gambling problems**
 - Problem Gamblers: 16.1% (BOPS)
- **Entered into casino self-exclusion agreement**
 - Problem Gamblers: 24.5% (BOPS)
- Caveat: main area BGPS & BOPS problem gamblers divergent, with numbers too low in BGPS to calculate reliable estimates
- Overall results consistent with other research indicating that only ~10% of problem gamblers seek formal treatment

IMPACTS OF GAMBLING IN MASSACHUSETTS: RESULTS OF A BASELINE ONLINE PANEL SURVEY (BOPS)

Abstract

This report summarizes the results of a baseline online panel survey. The purpose of this survey was to recruit a significantly larger number of problem gamblers than could be obtained in a general population survey. The enriched sample provides more reliable estimates of the negative personal impacts of gambling, the differential impact of different types of gambling, and prevention awareness and treatment-seeking behavior of problem gamblers in Massachusetts. This information is useful to help establish baseline levels of impacts prior to the introduction of casino gambling to Massachusetts as well as for purposes of treatment planning.

Authors

Robert J. Williams
Penny S. Pekow
Rachel A. Volberg
Edward J. Stanek III
Martha Zorn
Amanda Houpt

January 10, 2017

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Acknowledgements

Support for this study came from the Massachusetts Gaming Commission under ISA MGC10500003UMS15A establishing the Social and Economic Impacts of Gambling in Massachusetts (SEIGMA) study. This multi-year project was competitively bid via the Massachusetts Gaming Commission Request for Response (MGC-RA-2012) for Research Services and awarded to the University of Massachusetts Amherst in April 2013.

The online survey could not have been completed without the cooperation and good will of the thousands of Massachusetts residents who agreed to participate. We are also grateful to staff at Ipsos Public Affairs who helped in collecting the data for the online panel survey and to the many individuals at NORC at the University of Chicago who helped in collecting the data for the general population survey.

We would like to thank the members of the Massachusetts Gaming Commission's Gaming Research Advisory Committee (GRAC) and Research Design and Analysis Subcommittee (RDASC). Members of these committees represent a range of perspectives and their careful review of draft versions of this report contributed to its clarity as well as utility to multiple audiences.

Finally, we would like to thank Mark Vander Linden, Director of Research and Responsible Gaming, Chairman Stephen P. Crosby and Commissioner Enrique Zuniga of the Massachusetts Gaming Commission, for their thoughtful input and clear guidance over the course of the SEIGMA project. The Commission's broad vision for the expansion of gambling in Massachusetts and commitment to the research needed to maximize the benefits and minimize harms related to gambling in the Commonwealth made this project possible.

SUGGESTED CITATION:

Williams, R. J., Pekow, P. S., Volberg, R. A., Stanek, E. J., Zorn, M., Houpt, K. A. (2016). *Impacts of Gambling in Massachusetts: Results of a Baseline Online Panel Survey (BOPS)*. Amherst, MA: School of Public Health and Health Sciences, University of Massachusetts Amherst.

A PDF OF THIS REPORT CAN BE DOWNLOADED AT: www.umass.edu/seigma

Introduction

Online panels consist of a group of people recruited to participate in online surveys in return for compensation. Sociodemographic and behavioral information is collected from panel members so that a stratified sample can be selected to match the sociodemographic characteristics of the particular jurisdiction when a survey is conducted. Online panels are commonly used in market research, and increasingly in academic studies (Göriz, 2007; Göriz, Reinhold, & Batinic, 2002). The advantages of online panel surveys are that a) the validity of answers to 'sensitive questions' (e.g., gambling) tends to be higher in self-administered formats (Tourangeau & Smith, 1996; van der Heijden, Van Gils, Bouts, & Hox, 2000); b) everyone has agreed and expects to be contacted (unlike telephone surveys); c) the results can be obtained in a much shorter period of time; and d) they are much less expensive than other probability sampling surveys.

However, online panels have some limitations. The main limitation is the non-representative nature of the online panel population due to the fact that most online panelists have not been randomly selected, but instead, have independently initiated membership after seeing advertising, being referred by a friend, and/or receiving a mass email solicitation. Although online panels are usually stratified to be demographically representative of the population, behavioral differences typically exist. One obvious difference is that a non-random minority of people do not use the Internet, and thus are not eligible to be part of an online panel.

Another consistent finding concerns higher levels of pathology. Dr. Robert Williams, one of the Principal Investigators of the SEIGMA study, has conducted three separate research investigations, each of which has compared data obtained from a random sample of online panelists to a comparable sample of people contacted via random digit dialing within the same jurisdiction. In all three investigations, even after controlling for all demographic differences, the overall rates of substance use, mental health problems, gambling involvement, and addictions were significantly higher in the online panel, which also produced significantly higher rates of problem gambling (4.6% versus 2.1% in Alberta in 2008; 5.6% versus 3.1% in Alberta in 2009; 11.4% versus 1.0% in South Korea in 2011; 8.3% versus 1.0% in Ontario in 2011) (see also Lee, Back, Williams, & Ahn, 2015). This latter result has also been found in Massachusetts. For example, the 2013 online panel study conducted by the Massachusetts Council on Compulsive Gambling (2013) obtained a problem gambling rate of 10% compared to only 2.0% in the SEIGMA Baseline General Population Survey (BGPS) conducted in 2013/2014 using address-based sampling (Volberg et al., 2015).¹

¹ The MCGG online panel survey used an older assessment instrument based on DSM-III criteria (the South Oaks Gambling Screen; Lesieur & Blume, 1987). As a consequence, the prevalence rate of problem gambling obtained in the MCGG survey is not directly comparable to the prevalence rate obtained in the BGPS (i.e., different assessment criteria; no time frame specified in the SOGS versus a 12 month time frame in the BGPS). That being said, it should be noted that in addition to being much higher than the PPGM problem gambling rate in the BGPS, the SOGS 3+ rate in the MCGG survey is also substantially higher than the average SOGS 3+ rate obtained in nine national population surveys (3.5%) as well as the average SOGS 3+ rate obtained in 28 U.S. state population surveys (4.8%). Using the more conventional 5+ cutoff for the SOGS, the MCGG rate of 5% compares to an average of 1.2% among the national surveys and 1.7% among the state surveys (Williams, Volberg, & Stevens, 2012).

Purpose of the SEIGMA Online Panels

1. Due to their imperfect representativeness, *online panels cannot be used to establish precise estimates of population prevalence (the SEIGMA team used the BGPS for this purpose)*. However, an online panel survey can be used to recruit a significantly larger proportion of problem gamblers than could be obtained with addressed-based sampling methodology (only 129 problem gamblers were identified in the BGPS). **This was one of the primary purposes of the Baseline Online Panel Survey (BOPS) in the SEIGMA project.** An enriched sample of problem gamblers beyond the 129 in the BGPS potentially allows us to provide more reliable estimates in three specific areas of interest:
 - a. Negative personal impacts of gambling;
 - b. Differential impact of different types of gambling on gambling-related problems; and
 - c. Prevention awareness and treatment-seeking behavior of problem gamblers.²
2. Furthermore, because the BOPS data was collected in 2013/2014, all of these above indices also serve as baseline measures to help establish the impacts of the introduction of casino gambling to Massachusetts (occurring between 2015 and 2019). **More specifically, a follow-up online panel in 2020 (FOPS) will examine changes between BOPS and FOPS.**

A detailed list of the information contained in these surveys pertaining to the negative impacts of gambling; differential impact of different types of gambling on gambling-related problems; and prevention and awareness, is presented below.

Negative Personal Impacts of Gambling

The following impacts are key indices of the negative socioeconomic effects of legal gambling availability. Thus, it is essential to establish their prevalence both before the introduction of casino gambling (via the BGPS and BOPS) as well as after. As noted above, follow-up assessment will be done with a Follow-Up General Population Survey (FGPS) and a Follow-Up Online Panel Survey (FOPS) currently slated for 2020. In addition to their socioeconomic relevance, these negative personal impacts speak to the nature and pattern of difficulties experienced by problem gamblers, which is potentially useful to prevention efforts and treatment providers.³

- Financial problems due to gambling, including
 - Bankruptcies
- Health problems due to gambling, including
 - Need to seek medical or psychological help
- Mental health problems due to gambling, including
 - Suicidal thoughts
 - Suicide attempts
- Relationship problems due to gambling, including
 - Domestic violence
 - Separation or divorce
 - Neglect of children or family
 - Child welfare involvement

² The small number of problem gamblers in the BGPS precluded the detailed reporting of these estimates in Volberg et al. (2015) and Houpt, Volberg, Williams, Stanek, and Zorn (2015).

³ It is important to recognize that the common substance abuse and mental health comorbidities of problem gamblers are also partly responsible for these negative impacts.

- Work or school problems due to gambling, including
 - Number of work or school days lost
 - Losing employment or having to quit school
 - Receiving public assistance or welfare payments
 - Amount of money received from these public assistance and/or welfare payments
- Commission of illegal acts due to gambling, including
 - Amount of money taken illegally
 - Arrests
 - Convictions
 - Incarcerations
 - Average number of days incarcerated

Data pertaining to these variables in the BGPS, BOPS, FGPS, and FOPS have two major advantages over general population-level changes in these indices available from secondary data sources. For one, these impacts can be more directly attributed to gambling, as the survey questions ask whether these problems or events occurred “because of your gambling,” whereas there are a myriad of economic and social events that influence state-wide changes in the rate of divorces, bankruptcies, unemployment, etc. For another, some of the state-wide rates in these secondary data sources underestimate the true rate at which these impacts occur, as most suicide attempts, incidents of domestic violence, and crime go unreported and/or undetected.

Impacts of Different Forms of Gambling on Gambling-Related Problems

Not all forms of gambling have the same potential for harm. Rather, continuous forms of gambling (e.g., electronic gambling machines, casino table games) and forms of gambling that are continuously convenient and available (e.g., online gambling) tend to create elevated risk (Dowling, Smith, & Thomas, 2005; Parke & Griffiths, 2007; Welte, Barnes, Wieczorek, Tidwell, & Hoffman, 2007; Williams, West, & Simpson, 2012; Wood, Williams, & Parke, 2012). That being said, problem gamblers tend to engage in a wide range of different types of gambling, all of which make some contribution to the harms experienced. Furthermore, the strong relationship between some forms of gambling (e.g., online gambling) and problem gambling is partly due to the fact that these forms tend to be patronized by individuals with heavy general levels of gambling involvement (LaPlante, Nelson, LaBrie, & Shaffer, 2009; Wood et al., 2012).

Ascertaining the differential impacts of different forms of gambling can be addressed in a number of ways. The way in which they are addressed in the BGPS and BOPS is by asking all problem gamblers whether there was a particular form of gambling that has contributed to their problems more than others, and, if so, to identify this particular form.

Prevention Awareness and Treatment Seeking Behavior of Problem Gamblers

There are several questions in the BGPS and BOPS that are useful for the purposes of treatment and prevention planning. More specifically, the BGPS and BOPS contain questions that help ascertain the number and percentage of Massachusetts problem gamblers who a) have heard or seen any media campaigns to prevent problem gambling in Massachusetts; b) were aware of any programs to prevent problem gambling offered at school, work, or in the community; c) participated in any problem gambling prevention programs in the past 12 months; d) altered their gambling behavior because of these media campaigns or programs; e) desired help for gambling problems; f) sought help for gambling problems; g)

where they sought help from; h) whether they found the treatment helpful; i) whether they entered into a casino self-exclusion agreement; and j) the state in which they entered into a casino self-exclusion agreement.

Methods

Sample and Recruitment

Ipsos Public Affairs (Ipsos) conducted the SEIGMA Baseline Online Panel Survey (BOPS). Ipsos maintains an online panel of individuals across the country who have agreed to participate in research studies. The Massachusetts panel contains approximately 17,000 individuals. When participants joined the Ipsos panel, they provided demographic information about themselves and their household (e.g., age, gender, state of residence, county of residence). Ipsos used this information to email a stratified sample of participants by age, gender and region (Western versus Eastern MA) that was proportional to the number of people in these groups as reported by the U.S. Census. Over the time period in which the survey was in the field, Ipsos drew additional replicate samples and monitored completion rates until at least 5,000 complete surveys were obtained. To obtain a final sample of 5,000, Ipsos supplemented their own online panel sample with Massachusetts online panel members from seven partner vendors.

The BOPS questionnaire (Appendix A) was the same questionnaire used in the Baseline General Population Survey (BGPS) and the Baseline Targeted Surveys (BTS). The questionnaire was extensively reviewed, edited and pre-tested. As was the case with the BGPS, the SEIGMA team submitted a protocol and received approval for the BOPS from the University of Massachusetts Amherst Institutional Review Board.

BOPS was launched in late October 2013, and data collection ended in late March 2014 to run coincident with data collection in the BGPS which was in the field from September 2013 to May 2014. Of the 26,913 people who began the BOPS, 18,580 were deemed to be not eligible (primarily out-of-state panelists), 2,946 quit before finishing, 293 were excluded because of a full age x gender quota, and 48 were removed because of data quality issues. In the end, a total of 5,046 completed surveys were obtained.

BGPS Response Rates and Weighting

The BGPS used an Address-Based Sampling (ABS) approach (Link, Battaglia, Frankel, Osborn, & Mokdad, 2008) whereby a random sample of Massachusetts addresses was initially chosen, with over-selection of Western Massachusetts to ensure acceptable precision in establishing problem gambling prevalence in this part of the state. All selected addresses were mailed a letter and subsequent postcards inviting the household member with the most recent birthday to participate in the BGPS online (WEB). Households where no response was received after another four weeks were mailed paper versions of the BGPS and invited to alternatively complete the BGPS via this modality and return it by mail (SAQ). Households where no response was received after four weeks were called on their landline (this number was available in 78% of cases) and invited to answer the BGPS questions over the telephone (CATI). An overall 36.6% AAPOR RR3 response rate was achieved, yielding a final sample of 9,578 respondents.

Final BGPS weights were derived from a sequence of six steps that adjusted for demographic deviations from the Massachusetts population:

- Adjustment for the deliberate oversampling of addresses in Western Massachusetts. This weight was assigned to all sampled addresses that were initially chosen.
- Additional adjustment for the fact that the ability to establish the eligibility of different address types (i.e., an occupied residential, non-business address) varied as a function of whether it was in a

Spanish versus English speaking neighborhood; whether it was a post office box, single family dwelling, or multiple family dwelling; and whether the address was in Western or Eastern Massachusetts. 'Screened addresses' where eligibility could be determined were assigned higher or lower weights as a function of whether the address type was normally associated with higher or lower rates of unknown eligibility.

- Additional adjustment for the fact that differences in the rate of completed surveys varied as a function of region (Western or Eastern Massachusetts), language (English or Spanish), and modality (WEB, SAQ, CATI). These weights were applied to all completed surveys.
- Additional adjustment for household size (i.e., to compensate for the oversampling of people from small households and undersampling of people from large households).
- Additional adjustment via iterative raking to more closely align the distribution of the obtained sample to the known distribution of the 2012 Massachusetts adult (18+) population in terms of region x age, region x gender, region x race/ethnicity, region x education, age x gender, age x race/ethnicity, age x education, gender x race/ethnicity, gender x education, and race/ethnicity x education.
- Trimming the maximum and minimum allowable weights so as to increase the accuracy of derived estimates (e.g., prevalence of problem gambling).

BOPS Weighting

A two-step procedure was used to develop weights for the BOPS sample:

- Each person was initially given an equal weight (1,039.4) so that the total number of BOPS respondents approximated the estimated 2012 Massachusetts adult (18+) population of 5,244,629.
- Similar to BGPS, an iterative raking procedure was then used to adjust these weights to demographically align the respondents with the Massachusetts population in terms of region x age, region x gender, region x race/ethnicity, age x gender, age x race/ethnicity, age x education, gender x race/ethnicity, gender x education, and race/ethnicity x education.

BGPS versus BOPS Problem Gamblers

An important methodological issue concerns whether problem gamblers identified in the unweighted BOPS are systematically different in some way from problem gamblers identified in the unweighted BGPS. Considering the two different ways in which these samples are selected, it seems likely that some differences will exist. The nature of these differences will be explored via univariate and multivariate comparisons, as reported in the next section of this report.

Results

Demographics, Health Status, and Gambling Behavior of the Entire BGPS Sample Compared to the Entire BOPS Sample

Table 1 displays descriptive statistics for variables in BGPS and BOPS with demographic variables presented first, followed by health-related variables, and then gambling-related variables. Chi square tests identified significant differences between the groups on virtually all variables. However, this is primarily due to the different study designs and the very large sample sizes in each group (9,578 and 5,046 respectively). Focusing on variables where the 95% confidence intervals did not overlap, demographically, BOPS respondents were significantly younger and more likely to be White, born in the U.S., never married, less educated, unemployed, have a lower household income, and to be from Greater Boston. More pronounced differences existed on the health variables, with BOPS respondents more likely to report poorer health, participation in extreme sports and an unhappy childhood as well as higher levels of tobacco use, binge drinking, behavioral addictions, and mental health problems. As expected, the gambling-related variables were also noticeably different between the groups, with BOPS respondents being more likely to participate in all forms of gambling as well as engage in a larger number of gambling formats, have higher PPGM total scores, and have a higher prevalence of problem and pathological gambling ($n = 317$, 6.4% compared to $n = 129$, 1.4% in the BGPS).

Table 1. Demographics, Health Status, and Gambling Behavior of the Entire BGPS Sample Compared to the Entire BOPS Sample, Unweighted Data

		Baseline General Population Survey (BGPS) (N = 9,578)		Baseline Online Panel Survey (BOPS) (N = 5,046)		p
		%	95% C.I.	%	95% C.I.	
Gender	Male	39.7	(38.8, 40.7)	47.1	(45.7, 48.5)	<.001
	Female	59.1	(58.1, 60.1)	52.9	(51.5, 54.3)	
	Missing	1.1	(0.9, 1.4)	0.0	NA	
Age	18-34	14.1	(13.4, 14.8)	28.2	(27.0, 29.5)	<.001
	35-64	51.0	(50.0, 52.0)	53.1	(51.7, 54.4)	
	65+	30.0	(29.1, 30.9)	18.7	(17.6, 19.8)	
	Missing	4.9	(4.5, 5.4)	0.0	NA	
Race/Ethnicity	Hispanic	5.0	(4.6, 5.5)	5.2	(4.6, 5.9)	<.001
	Black	3.8	(3.5, 4.2)	4.1	(3.6, 4.7)	
	White	83.0	(82.3, 83.8)	85.2	(84.2, 86.1)	
	Asian	3.8	(3.4, 4.2)	3.9	(3.4, 4.5)	
	Other or Missing	4.3	(3.9, 4.7)	1.6	(1.3, 2.0)	
Born in United States	No	13.0	(12.3, 13.7)	8.1	(7.4, 8.9)	<.001
	Yes	85.0	(84.3, 85.7)	91.5	(90.7, 92.2)	
	Missing	2.0	(1.8, 2.3)	0.4	(0.3, 0.6)	
Marital status	Never married	16.5	(15.8, 17.3)	29.7	(28.5, 31.0)	<.001
	Living with partner/ Married/Widowed	68.6	(67.7, 69.5)	58.6	(57.2, 60.0)	
	Divorced or Separated	12.4	(11.8, 13.1)	11.2	(10.3, 12.1)	
	Missing	2.5	(2.2, 2.8)	0.5	(0.3, 0.8)	

		Baseline General Population Survey (BGPS) (N = 9,578)		Baseline Online Panel Survey (BOPS) (N = 5,046)		p
		%	95% C.I.	%	95% C.I.	
Education	High School or less	18.0	(17.2, 18.7)	22.6	(21.5, 23.8)	<.001
	Some College or BA	52.2	(51.2, 53.2)	61.6	(60.3, 62.9)	
	Graduate Degree	27.9	(27.0, 28.8)	15.2	(14.3, 16.3)	
	Missing	1.9	(1.7, 2.2)	0.5	(0.4, 0.8)	
Employment	Employed	57.3	(56.3, 58.3)	54.3	(52.9, 55.7)	<.001
	Unemployed	3.7	(3.3, 4.1)	6.7	(6.0, 7.4)	
	Retired	25.9	(25.0, 26.8)	16.7	(15.7, 17.8)	
	Other ⁴	11.0	(10.4, 11.7)	21.2	(20.1, 22.3)	
	Missing	2.1	(1.8, 2.4)	1.1	(0.8, 1.4)	
Household Income	Less than \$15,000	8.8	(8.3, 9.4)	9.0	(8.3, 9.9)	<.001
	\$15,000-<\$30,000	10.8	(10.2, 11.4)	13.7	(12.8, 14.7)	
	\$30,000-<\$50,000	13.9	(13.2, 14.6)	17.6	(16.5, 18.6)	
	\$50,000-<\$100,000	25.9	(25.0, 26.8)	30.7	(29.4, 32.0)	
	\$100,000-<\$150,000	14.3	(13.6, 15.0)	12.6	(11.7, 13.5)	
	\$150,000 and more	11.8	(11.2, 12.5)	5.4	(4.8, 6.0)	
	Missing	14.5	(13.8, 15.2)	11.1	(10.2, 12.0)	
Military service	No	89.2	(88.5, 89.8)	90.0	(89.1, 90.8)	.010
	Yes	9.6	(9.1, 10.2)	9.3	(8.5, 10.1)	
	Missing	1.2	(1.0, 1.5)	0.7	(0.5, 1.0)	
Region	Western Massachusetts	29.0	(28.9, 29.0)	23.7	(22.6, 24.9)	<.001
	Greater Boston	55.4	(54.7, 56.1)	60.3	(59.0, 61.7)	
	Southeastern Massachusetts	15.7	(15.0, 16.4)	15.9	(14.9, 17.0)	
Health status past 12 months	Excellent	21.3	(20.5, 22.2)	13.1	(12.2, 14.0)	<.001
	Very Good	38.3	(37.4, 39.3)	34.4	(33.1, 35.7)	
	Good	27.8	(26.9, 28.7)	34.8	(33.5, 36.1)	
	Fair	10.0	(9.4, 10.6)	14.1	(13.1, 15.0)	
	Poor	2.4	(2.1, 2.7)	3.3	(2.9, 3.9)	
	Missing	0.2	(0.1, 0.3)	0.3	(0.2, 0.5)	
Participate in extreme sports	No	93.2	(92.7, 93.7)	79.4	(78.3, 80.5)	<.001
	Yes	6.5	(6.0, 7.0)	12.0	(11.1, 12.9)	
	Missing	0.3	(0.2, 0.5)	8.6	(7.9, 9.4)	
Overall stress past 12 months	Very Low	3.6	(3.3, 4.0)	5.6	(5.0, 6.3)	<.001
	Low	16.0	(15.3, 16.8)	17.2	(16.2, 18.2)	
	Moderate	46.0	(45.0, 47.0)	40.6	(39.3, 42.0)	
	High	25.5	(24.6, 26.4)	25.5	(24.3, 26.7)	
	Very High	8.6	(8.0, 9.1)	10.6	(9.7, 11.4)	
	Missing	0.3	(0.2, 0.5)	0.6	(0.4, 0.8)	
Current tobacco use	No	85.2	(84.5, 85.9)	71.1	(69.8, 72.3)	<.001
	Yes	12.9	(12.2, 13.6)	28.0	(26.8, 29.3)	
	Missing	1.8	(1.6, 2.1)	0.9	(0.6, 1.2)	

⁴ Student, homemaker, disabled were combined into 'Other' because of small samples sizes in each.

		Baseline General Population Survey (BGPS) (N = 9,578)		Baseline Online Panel Survey (BOPS) (N = 5,046)		p
		%	95% C.I.	%	95% C.I.	
Alcohol use past 30 days	No	29.7	(28.8, 30.6)	33.2	(31.9, 34.5)	<.001
	Yes	70.0	(69.0, 70.9)	66.4	(65.1, 67.7)	
	Missing	0.3	(0.2, 0.5)	0.4	(0.3, 0.6)	
Binge drinking past 30 days	No	71.6	(70.7, 72.5)	61.9	(60.5, 63.2)	<.001
	Yes	23.7	(22.9, 24.6)	29.9	(28.6, 31.2)	
	Missing	4.7	(4.3, 5.1)	8.2	(7.5, 9.0)	
Behavioral addictions past 12 months	No	88.4	(87.8, 89.1)	80.9	(79.8, 82.0)	<.001
	Yes	10.6	(10.0, 11.3)	17.1	(16.1, 18.2)	
	Missing	0.9	(0.8, 1.1)	2.0	(1.6, 2.4)	
Mental health problems past 12 months	No	79.8	(79.0, 80.6)	70.4	(69.1, 71.6)	<.001
	Yes	14.8	(14.1, 15.5)	26.0	(24.8, 27.2)	
	Missing	5.4	(4.9, 5.8)	3.7	(3.2, 4.2)	
Childhood Rating	Very happy	26.9	(26.0, 27.7)	19.3	(18.3, 20.4)	<.001
	Happy	48.6	(47.6, 49.6)	47.1	(45.7, 48.5)	
	Neither happy nor unhappy	16.6	(15.9, 17.4)	21.3	(20.2, 22.5)	
	Unhappy	5.5	(5.0, 5.9)	8.8	(8.1, 9.6)	
	Very unhappy	1.6	(1.4, 1.9)	2.6	(2.2, 3.1)	
	Missing	0.8	(0.6, 1.0)	0.9	(0.6, 1.1)	
Friend and Family involvement in Gambling	None of them	51.0	(50.0, 52.0)	40.9	(39.6, 42.3)	<.001
	Some of them	45.2	(44.2, 46.2)	47.1	(45.7, 48.5)	
	Most of them	1.7	(1.5, 2.0)	3.5	(3.0, 4.0)	
	All of them	0.8	(0.7, 1.0)	0.9	(0.7, 1.2)	
	Missing	1.2	(1.0, 1.5)	7.6	(6.9, 8.4)	
Played Traditional Lottery Games in Past 12 months	No	42.6	(41.6, 43.6)	29.4	(28.2, 30.7)	<.001
	Yes	57.2	(56.2, 58.1)	69.7	(68.4, 71.0)	
	Missing	0.2	(0.2, 0.4)	0.9	(0.6, 1.2)	
Played Instant Games in Past 12 months	No	63.2	(62.2, 64.2)	47.7	(46.3, 49.1)	<.001
	Yes	36.1	(35.2, 37.1)	50.5	(49.1, 51.9)	
	Missing	0.7	(0.5, 0.8)	1.8	(1.5, 2.3)	
Played Daily Lottery Games in Past 12 months	No	87.0	(86.4, 87.7)	80.9	(79.8, 82.0)	<.001
	Yes	12.3	(11.6, 12.9)	17.8	(16.7, 18.8)	
	Missing	0.7	(0.6, 0.9)	1.3	(1.0, 1.7)	
Gambled at Casino in Past 12 months	No	75.1	(74.2, 75.9)	63.0	(61.7, 64.4)	<.001
	Yes	19.2	(18.4, 20.0)	30.6	(29.3, 31.9)	
	Missing	5.7	(5.3, 6.2)	6.4	(5.7, 7.1)	
Played Bingo in Past 12 months	No	96.4	(96.0, 96.8)	91.3	(90.5, 92.0)	<.001
	Yes	3.0	(2.7, 3.4)	8.7	(8.0, 9.5)	
	Missing	0.6	(0.4, 0.7)	0.0	NA	
Bet on Horse Racing in Past 12 months	No	96.2	(95.8, 96.5)	92.8	(92.0, 93.4)	<.001
	Yes	3.4	(3.1, 3.8)	6.2	(5.6, 6.9)	
	Missing	0.4	(0.3, 0.5)	1.1	(0.8, 1.4)	

		Baseline General Population Survey (BGPS) (N = 9,578)		Baseline Online Panel Survey (BOPS) (N = 5,046)		p
		%	95% C.I.	%	95% C.I.	
Sports Betting in Past 12 months	No	88.9	(88.2, 89.5)	85.6	(84.6, 86.5)	<.001
	Yes	10.7	(10.1, 11.3)	13.2	(12.3, 14.2)	
	Missing	0.4	(0.3, 0.6)	1.2	(0.9, 1.6)	
Private Betting in Past 12 months	No	90.3	(89.7, 90.9)	83.5	(82.4, 84.5)	<.001
	Yes	8.8	(8.2, 9.4)	15.2	(14.3, 16.3)	
	Missing	0.9	(0.8, 1.2)	1.3	(1.0, 1.6)	
Online Gambling in Past 12 months	No	97.6	(97.3, 97.9)	92.1	(91.3, 92.8)	<.001
	Yes	1.1	(1.0, 1.4)	6.0	(5.4, 6.7)	
	Missing	1.2	(1.0, 1.5)	1.9	(1.6, 2.3)	
# Gambling Formats	Mean	1.9	(1.8, 1.9)	2.4	(2.3, 2.4)	<.001
	Median	2.0	(2.0, 2.0)	2.0	(2.0, 2.0)	
Total Gambling Expenditure (\$)	Mean	-\$1067	(-1400, -734)	-\$969	(-3415, 1477)	<.001
	Median	-\$24.0	(-34.9, -24.0)	\$0.0	(0, 0)	
PPGM total score	Mean	0.1	(0.1, 0.1)	0.5	(0.4, 0.5)	< .001
	Median	0.0	(0.0, 0.0)	0.0	(0.0, 0.0)	
Problem Gambling Prevalence		1.4	(1.1, 1.6)	6.4	(5.7, 7.1)	<.001

Note: *Italicized figures indicate estimates with relative standard error > 30%.*

Note: *Illicit drug use and problems with drugs/alcohol are not reported due to 81% of the data being missing for the former, and problems with the skip pattern for the latter in BOPS. Raffles are not reported due to problems with the skip pattern in BOPS.*

Note: *Negative values for expenditure denote a net loss and positive values denote a net win.*

Demographics, Health Status, and Gambling Behavior of Problem Gamblers in the BGPS Sample Compared to the BOPS Sample

An important methodological issue, and a focus of the present analysis, concerns whether the 317 problem and pathological gamblers identified in the BOPS are systematically different from the 129 problem and pathological gamblers identified in the BGPS. If they are not different, then it may be reasonable to combine the problem gamblers from the two samples and analyze the data collectively. If they are different, then another approach is needed. Table 2 contains these univariate comparisons.

Partly due to smaller sample sizes, fewer significant differences (23/33) were found between the problem gamblers in the two samples compared to these same comparisons between the full samples. Demographically, BOPS problem gamblers were significantly younger, more likely to be born in the United States, more likely to be never married, less likely to be retired and less likely to be from Western Massachusetts compared to BGPS problem gamblers. In terms of health status and behavior, BOPS problem gamblers were considerably more likely to report being in good health, participate in extreme sports, have higher stress, use tobacco, and have mental health problems. In terms of gambling behavior, BOPS problem gamblers were more likely to participate in bingo, private betting and online gambling, to engage in more gambling formats, and to have higher average but lower median gambling expenditure.

Table 2. Demographics, Health Status, and Gambling Behavior of Problem Gamblers in the BGPS Sample Compared to the BOPS Sample, Unweighted Data

		Baseline General Population Survey (BGPS) (n = 129)		Baseline Online Panel Survey (BOPS) (n = 317)		p
		%	95% C.I.	%	95% C.I.	
Gender	Male	65.9	(57.3, 73.5)	67.5	(62.2, 72.4)	.590
	Female	33.3	(25.8, 41.9)	32.5	(27.6, 37.8)	
	Missing	Cell size ≤ 5		0.0	NA	
Age	18-34	15.5	(10.2, 22.8)	49.2	(43.7, 54.7)	<.001
	35-64	55.0	(46.4, 63.4)	46.1	(40.6, 51.6)	
	65+	26.4	(19.5, 34.6)	4.7	(2.9, 7.7)	
	Missing	Cell size ≤ 5		0.0	NA	
Race/Ethnicity	Hispanic	6.2	(3.1, 11.9)	11.4	(8.3, 15.3)	.158
	Black	14.7	(9.6, 21.9)	7.9	(5.4, 11.4)	
	White	73.6	(65.4, 80.5)	75.1	(70.0, 79.5)	
	Asian	Cell size ≤ 5		4.4	(2.6, 7.3)	
	Other or Missing	Cell size ≤ 5		Cell size ≤ 5		
Born in United States	No	20.9	(14.8, 28.8)	8.8	(6.2, 12.5)	.004
	Yes	79.1	(71.2, 85.2)	90.5	(86.8, 93.3)	
	Missing	0.0	NA	Cell size ≤ 5		
Marital status	Never married	20.9	(14.8, 28.8)	39.4	(34.2, 44.9)	<.001
	Living with partner/ Married/Widowed	57.4	(48.7, 65.6)	48.6	(43.1, 54.1)	
	Divorced or Separated	20.9	(14.8, 28.8)	11.7	(8.6, 15.7)	
	Missing	Cell size ≤ 5		Cell size ≤ 5		
Education	High School or less	41.9	(33.7, 50.5)	32.8	(27.9, 38.2)	.026
	Some College or BA	44.2	(35.9, 52.8)	57.4	(51.9, 62.7)	
	Graduate Degree	10.9	(6.5, 17.5)	9.8	(7.0, 13.6)	
	Missing	Cell size ≤ 5		0.0	NA	
Employment	Employed	53.5	(44.9, 61.9)	60.9	(55.4, 66.1)	.007
	Unemployed	12.4	(7.7, 19.3)	12.6	(9.4, 16.7)	
	Retired	20.2	(14.1, 27.9)	6.3	(4.1, 9.6)	
	Other ⁵	12.4	(7.7, 19.3)	18.9	(15.0, 23.6)	
	Missing	Cell size ≤ 5		Cell size ≤ 5		
Household Income	Less than \$15,000	18.6	(12.8, 26.2)	11.0	(8.0, 15.0)	.015
	\$15,000-<\$30,000	17.1	(11.5, 24.5)	12.9	(9.7, 17.1)	
	\$30,000-<\$50,000	15.5	(10.2, 22.8)	22.4	(18.1, 27.3)	
	\$50,000-<\$100,000	25.6	(18.8, 33.8)	38.8	(33.6, 44.3)	
	\$100,000-<\$150,000	10.1	(5.9, 16.6)	8.5	(5.9, 12.1)	
	\$150,000 and more	6.2	(3.1, 11.9)	3.2	(1.7, 5.8)	
	Missing	7.0	(3.7, 12.9)	3.2	(1.7, 5.8)	
Military service	No	77.5	(69.5, 83.9)	87.4	(83.3, 90.6)	.042
	Yes	20.2	(14.1, 27.9)	12.3	(9.1, 16.4)	
	Missing	Cell size ≤ 5		Cell size ≤ 5		

⁵ Student, homemaker, disabled was combined into 'Other' because of small samples sizes in each.

		Baseline General Population Survey (BGPS) (n = 129)		Baseline Online Panel Survey (BOPS) (n = 317)		p
		%	95% C.I.	%	95% C.I.	
Region	Western Massachusetts	30.2	(23.0, 38.6)	17.4	(13.6, 21.9)	.019
	Greater Boston	54.3	(45.7, 62.6)	65.3	(59.9, 70.3)	
	South Eastern Massachusetts	15.5	(10.2, 22.8)	17.4	(13.6, 21.9)	
Health status past 12 months	Excellent	7.0	(3.7, 12.9)	20.8	(16.7, 25.6)	<.001
	Very Good	27.9	(20.9, 36.2)	29.3	(24.6, 34.6)	
	Good	43.4	(35.2, 52.1)	30.6	(25.8, 35.9)	
	Fair	17.8	(12.2, 25.4)	16.1	(12.4, 20.6)	
	Poor	Cell size ≤ 5		3.2	(1.7, 5.8)	
	Missing	0.0	NA	0.0	NA	
Participate in extreme sports	No	89.9	(83.4, 94.1)	50.2	(44.7, 55.6)	<.001
	Yes	9.3	(5.4, 15.7)	38.2	(33.0, 43.6)	
	Missing	Cell size ≤ 5		11.7	(8.6, 15.7)	
Overall stress past 12 months	Very Low	Cell size ≤ 5		3.5	(1.9, 6.2)	.003
	Low	8.5	(4.8, 14.7)	8.8	(6.2, 12.5)	
	Moderate	50.4	(41.9, 58.9)	38.2	(33.0, 43.6)	
	High	32.6	(25.1, 41.1)	30.3	(25.5, 35.6)	
	Very High	7.0	(3.7, 12.8)	18.9	(15.0, 23.6)	
	Missing	0.0	NA	Cell size ≤ 5		
Current tobacco use	No	65.9	(57.3, 73.5)	39.1	(33.9, 44.6)	<.001
	Yes	31.8	(24.4, 40.3)	60.9	(55.4, 66.1)	
	Missing	Cell size < 5		0.0	NA	
Alcohol use past 30 days	No	27.9	(20.9, 36.2)	24.9	(20.5, 30.0)	.188
	Yes	72.1	(63.8, 79.1)	74.1	(69.0, 78.7)	
	Missing	0.0	NA	Cell size ≤ 5		
Binge drinking past 30 days	No	48.1	(39.6, 56.6)	36.3	(31.2, 41.7)	.036
	Yes	44.2	(35.9, 52.8)	57.7	(52.2, 63.1)	
	Missing	7.8	(4.2, 13.8)	6.0	(3.9, 9.2)	
Behavioral addictions past 12 months	No	64.3	(55.7, 72.1)	60.6	(55.1, 65.8)	.697
	Yes	34.9	(27.2, 43.5)	38.2	(33.0, 43.6)	
	Missing	Cell size ≤ 5		Cell size ≤ 5		
Mental health problems past 12 months	No	69.0	(60.5, 76.4)	47.3	(41.9, 52.8)	<.001
	Yes	26.4	(19.5, 34.6)	49.8	(44.4, 55.3)	
	Missing	4.7	(2.1, 10.0)	2.8	(1.5, 5.4)	
Childhood Rating	Very happy	17.1	(11.5, 24.5)	21.8	(17.6, 26.6)	.019
	Happy	41.9	(33.7, 50.5)	41.0	(35.7, 46.5)	
	Neither happy nor unhappy	28.7	(21.6, 37.0)	20.5	(16.4, 25.3)	
	Unhappy	11.6	(7.1, 18.4)	11.0	(8.0, 15.0)	
	Very unhappy	Cell size ≤ 5		5.0	(3.1, 8.1)	
	Missing	0.0	NA	Cell size ≤ 5		

		Baseline General Population Survey (BGPS) (n = 129)		Baseline Online Panel Survey (BOPS) (n = 317)		p
		%	95% C.I.	%	95% C.I.	
Friend and Family involvement in Gambling	None of them	14.7	(9.6, 21.9)	14.5	(11.0, 18.8)	.444
	Some of them	71.3	(63.0, 78.4)	66.9	(61.5, 71.8)	
	Most of them	9.3	(5.4, 15.7)	12.9	(9.7, 17.1)	
	All of them	<i>Cell size ≤ 5</i>		3.2	(1.7, 5.8)	
	Missing	<i>Cell size ≤ 5</i>		2.5	(1.3, 5.0)	
Played Traditional Lottery Games in Past 12 months	No	<i>Cell size ≤ 5</i>		4.1	(2.4, 6.9)	.912
	Yes	96.1	(91.0, 98.4)	95.9	(93.1, 97.6)	
	Missing	0.0	NA	0.0	NA	
Played Instant Games in Past 12 months	No	17.8	(12.2, 25.4)	12.0	(8.8, 16.0)	.030
	Yes	82.2	(74.6, 87.8)	86.4	(82.2, 89.8)	
	Missing	0.0	NA	<i>Cell size ≤ 5</i>		
Played Daily Lottery Games in Past 12 months	No	46.5	(38.1, 55.1)	45.4	(40.0, 50.9)	.031
	Yes	53.5	(44.9, 61.9)	52.4	(46.9, 57.8)	
	Missing	0	NA	2.2	(1.1, 4.6)	
Gambled at Casino in Past 12 months	No	39.5	(31.5, 48.2)	26.5	(21.9, 31.6)	.022
	Yes	55.0	(46.4, 63.4)	64.4	(58.9, 69.4)	
	Missing	5.4	(2.6, 10.9)	9.1	(6.4, 12.9)	
Played Bingo in Past 12 months	No	84.5	(77.2, 89.8)	68.8	(63.5, 73.6)	<.001
	Yes	14.0	(9.0, 21.0)	31.2	(26.4, 36.5)	
	Missing	<i>Cell size ≤ 5</i>		0.0	NA	
Bet on Horse Racing in Past 12 months	No	80.6	(72.9, 86.5)	73.8	(68.7, 78.4)	.205
	Yes	18.6	(12.8, 26.2)	25.9	(21.3, 31.0)	
	Missing	<i>Cell size ≤ 5</i>		<i>Cell size ≤ 5</i>		
Sports Betting in Past 12 months	No	67.4	(58.9, 74.9)	58.4	(52.9, 63.7)	.167
	Yes	31.8	(24.3, 40.3)	40.1	(34.8, 45.6)	
	Missing	<i>Cell size ≤ 5</i>		<i>Cell size ≤ 5</i>		
Private Betting in Past 12 months	No	76.0	(67.9, 82.5)	52.1	(46.5, 57.5)	<.001
	Yes	23.3	(16.8, 31.3)	46.4	(40.9, 51.9)	
	Missing	<i>Cell size ≤ 5</i>		<i>Cell size ≤ 5</i>		
Online Gambling in Past 12 months	No	86.0	(79.0, 91.0)	67.2	(61.8, 72.1)	<.001
	Yes	11.6	(7.1, 18.4)	30.6	(25.8, 35.9)	
	Missing	<i>Cell size ≤ 5</i>		2.2	(1.1, 4.6)	
# Gambling Formats	Mean	4.4	(4.0, 4.7)	5.2	(5.0, 5.5)	.001
	Median	4.0	(.0, 4.0)	5.0	(4.1, 5.0)	
Total Gambling Expenditure (\$)	Mean	-\$10001	(-14657, -5345)	-\$167323	(-50762, 17297)	<.001
	Median	-3600.0	(-4556, -2188)	-360.0	(-583, -60)	
PPGM total score	Mean	4.7	(4.3, 5.1)	4.7	(4.4, 5.0)	.599
	Median	4.0	(3.0, 4.8)	4.0	(3.0, 4.0)	

Note: *Italicized figures indicate estimates with relative standard error > 30%.*

Note: *Illicit drug use and problems with drugs/alcohol are not reported due to 81% of the data being missing for the former, and problems with the skip pattern for the latter in BOPS. Raffles are not reported due to problems with the skip pattern in BOPS.*

Note: *Negative values for expenditure denote a net loss and positive values denote a net win.*

Many of the above-mentioned individual variables are correlated with each other. Consequently, significant differences between individual variables may reflect differences in the same underlying

attribute. Thus, the more central question is whether significant differences exist between the groups when these variables are analyzed simultaneously and when differences in demographic characteristics and health-related behaviors are controlled for.

A stepwise binary logistic regression was undertaken to determine whether there were variables that significantly discriminated between problem gamblers in the BGPS versus the BOPS in a multivariate analysis. The model was developed in three stages using successive blocks of demographic, health-related, and gambling-related variables. In each stage a stepwise logistic regression model was fit while retaining statistically significant variables from the previous stage. In order for a variable to enter the model, the regression coefficient had to be statistically significant, with a *p*-value less than 0.01. Variables were dropped from the model if the *p*-value was greater than 0.05. The results of this analysis are summarized in Table 3.

Table 3. Stepwise Logistic Regression predicting BGPS Membership for Problem Gamblers, Unweighted Data

		Stage 1 (n = 444) Demographics	Stage 2 (n = 441) Health Behavior	Stage 3 (n = 441) Gambling
		Odds Ratio	Odds Ratio	Odds Ratio
Born in U.S.	No	3.12	3.55	3.55
	Yes	Reference group	Reference group	Reference group
Age	<35	Reference group	Reference group	Reference group
	35-64	3.48	2.56	2.56
	65+	20.85	9.00	9.00
Region	Western MA	2.61	2.54	2.53
	Greater Boston	Reference group	Reference group	Reference group
	Southeastern MA	1.02	1.19	1.22
Participate in extreme sports	No		3.32	3.32
	Yes		Reference group	Reference group
Current tobacco use	No		2.61	2.61
	Yes		Reference group	Reference group
Adjusted R-squared		.28	.39	.39

Note: A value greater than 1 indicates greater prevalence in the Baseline General Population Survey (BGPS); less than 1 indicates greater prevalence in the Baseline Online Panel (BOPS).

The three columns summarize the results of predicting the log of the odds ratio of a problem gambler coming from the BGPS for each stage of model development. The number of problem gamblers included in the analysis is given at the top of each column, with this number differing in each stage due to missing values for some variables. Results are presented as odds ratios (OR) for ease of interpretation.⁶ For example, the odds ratio of 3.12 in the first row and first column in Table 3 (Born in the US, Stage 1) means that the odds of not being born in the US was 3.12 times higher for problem

⁶ The odds ratio should be interpreted with some caution since the predicted outcome (i.e., being in the BGPS group) naturally occurs in 28.9% (129/446) of cases. This means that while the model and significance testing are correct, the odds ratio exaggerates the magnitude of the effect when interpreted as a relative risk.

gamblers from the BGPS compare to problem gamblers from the BOPS. As can be seen in the first column (Stage 1) of Table 3, three demographic variables (not being born in the U.S., older age, and being from Western MA), significantly differentiated between BGPS and BOPS membership. Two health-related variables (participation in extreme sports, tobacco use) provided additive predictive power at Stage 2. No gambling-related variables provided additive predictive power at Stage 3.

In summary, our multivariate analysis indicates that:

- There *are* significant multivariate differences between problem gamblers in the BGPS versus BOPS groups, although the magnitude of these differences is fairly modest (i.e., the logistic regression model explains 39% of the variance in group membership and the overall classification accuracy when maximizing sensitivity and specificity is 60.8%)
- The group differences are attributable primarily to a subset of five variables:
 - Being born outside the U.S., with this being 3.55 times more likely in the BGPS group.
 - Age, with age group 35-64 being 2.56 more likely in the BGPS group and age group 65+ being 9.00 times more likely in the BGPS group, relative to those younger than 35.
 - Region of Massachusetts, with the likelihood of being from Western MA being 2.53 times more likely in the BGPS group, relative to Greater Boston.
 - Participation in extreme sports, with not participating in extreme sports being 3.32 times more likely in BGPS.
 - Current tobacco use, with not being a current tobacco user being 2.61 times more likely in BGPS.

The lower proportion of immigrants among BOPS problem gamblers may be due to the low rate of immigrants within BOPS generally (i.e., 8.1% compared to 15.5% for Massachusetts between 2011 and 2015, according to the US Census Bureau; <http://www.census.gov/quickfacts/table/PST045215/25>). The older age of the BGPS problem gamblers may be due to the lower response rates for younger people in the BGPS. It should be noted that the modal age category for problem gamblers in population surveys is 18-34 (Williams, Volberg, et al., 2012, p. 265), as was found in the BOPS but not the BGPS. The higher proportion of problem gamblers from Western Massachusetts in BGPS is likely due to the deliberate oversampling of people from Western Massachusetts in the BGPS. The reason for the higher rate of participation in extreme sports and tobacco use among BOPS problem gamblers is unclear. It is interesting to note that population studies of non-treatment seeking problem gamblers show the average rate of tobacco use to be 60.1% (Lorains, Cowlshaw, & Thomas, 2011; McGrath & Barrett, 2009) which is much closer to what was found among the BOPS problem gamblers (60.9%) compared to the BGPS problem gamblers (31.8%). However, it is also possible that the BOPS problem gambler rate of tobacco use could be an artifact of the higher rate of tobacco use amongst BOPS respondents generally (28.0% versus 12.9% in BGPS).⁷

In any case, the results indicate that while the BOPS problem gamblers are somewhat similar to the BGPS problem gamblers, several important differences exist. Thus, the most conservative approach, and the approach used in the present report, is to report the results separately. As will be seen, the close similarities in the results between the two samples provides a type of independent replication of their validity.

⁷ Data from the 2013-2014 National Adult Tobacco Survey indicates that 19.4% of Massachusetts adults (18+) currently use tobacco.

Negative Personal Impacts of Gambling

The negative personal impacts of gambling among BGPS problem gamblers and BOPS problem gamblers are presented in Table 4. Negative impacts of gambling are most concentrated in problem gamblers, especially the most severe impacts. However, negative impacts are also experienced to some extent among gamblers who do not meet criteria for problem gambling. Thus, Table 4 not only reports the prevalence of impacts among problem gamblers, but also the prevalence of impacts among all people who reported gambling once a month or more in the past 12 months (inclusive of problem gamblers). We refer to this group as BPGS gamblers. The negative impacts among all gamblers is only reported for the BGPS and not the BOPS, as the latter contains a much higher (and non-representative) prevalence of heavily involved gamblers with high rates of associated comorbidities, which would produce an artificially high estimate of the rate of negative impacts. Similarly, because of the overestimate of the true prevalence of problem gamblers in the BOPS, the projected raw number of problem gamblers among which these impacts occur is only reported for the BGPS.

Because we are making population estimates in Table 4 (as well as in Tables 5, 6, and 7) the data in these tables are weighted to match the Massachusetts population by region, age, gender, education, and race/ethnicity. This weighting does not correct for the remaining differences in immigrant status, tobacco use, and engagement in extreme sports that are known to differentiate the two problem gambler samples, nor does it correct for other unknown variables that may differentiate these two groups.

Impacts of Different Forms of Gambling on Gambling-Related Problems

Everyone who scored 5 or higher on the Canadian Problem Gambling Index (CPGI) was asked a question concerning whether there was a particular type of gambling contributing to their problems more than others. If they indicated yes, they were asked to identify which type. These results are presented in Tables 5a and 5b.⁸

Prevention Awareness and Treatment Seeking Behavior of Problem Gamblers

Everyone who scored 5 or higher on the Canadian Problem Gambling Index (CPGI) was also asked about their awareness of media campaigns and programs to prevent problem gambling. If they indicated yes, they were asked whether they had participated in any of these programs and whether the media campaigns or prevention programs altered their gambling behavior. These results are contained in Table 6. Finally, problem gamblers were asked whether they had ever wanted help for gambling problems, whether they had sought help, and whether they had entered into a casino self-exclusion agreement. These results are reported in Table 7.

⁸ Note: CPGI 5+ is roughly equivalent to a PPGM problem gambler designation (Williams, Volberg, et al., 2012). The complexity of the PPGM scoring made it too complicated an algorithm to select people scoring as PPGM problem or pathological gamblers during survey administration.

Table 4. Baseline (2013/2014) Negative Impacts of Gambling in Past 12 Months among BGPS Gamblers, BGPS Problem Gamblers, and BOPS Problem Gamblers, Weighted Data

		Baseline General Population Survey GAMBLERS (Weighted N = 2,396,524)			Baseline General Population Survey PROBLEM GAMBLERS (Weighted N = 105,738)			Baseline Online Panel Survey PROBLEM GAMBLERS (Weighted)	
		N	%	95% C.I.	N	%	95% C.I.	%	95% C.I.
GP6a	Financial problems because of gambling	91,173	3.8	(2.9, 5.0)	50,756	48.0	(36.5, 59.7)	54.2	(48.1, 60.1)
GP6b	Filed for bankruptcy because of gambling	8,247	0.3	(0.1, 0.9)	Cell size ≤ 5			5.2	(3.0, 8.8)
GP7a	Health or stress problems because of gambling	89,871	3.8	(2.8, 4.9)	50,437	47.7	(36.1, 59.5)	49.6	(43.6, 55.7)
GP7b	Gambling-related health problems resulted in seeking medical or psychological help	15,293	0.6	(0.3, 1.3)	4,114	3.9	(1.5, 9.6)	8.7	(6.1, 12.3)
GP10a	Significant guilt, anxiety or depression because of gambling	75,688	3.2	(2.4, 4.2)	38,587	36.5	(25.3, 49.4)	31.4	(25.8, 37.5)
GP10b	Suicidal thoughts because of gambling	8,672	0.4	(0.1, 0.9)	Cell size ≤ 5			4.4	(2.5, 7.9)
GP10c	Attempted suicide because of gambling	Cell size ≤ 5			Cell size ≤ 5			3.3	(1.6, 6.8)
GP11a	Relationship problems because of gambling	27,321	1.1	(0.7, 1.9)	19,855	18.8	(10.3, 31.9)	13.7	(10.3, 18.1)
GP11b	Domestic violence because of gambling	6,706	0.3	(0.1, 0.9)	6,706	6.3	(2.0, 18.7)	5.2	(3.2, 8.2)
GP11c	Separation or divorce because of gambling	Cell size ≤ 5			Cell size ≤ 5			3.7	(2.1, 6.5)
GP12a	Neglect of children or family because of gambling	7,023	0.3	(0.1, 0.9)	6,443	6.1	(1.9, 18.3)	9.1	(6.2, 13.1)
GP12b	Child welfare services involved because of gambling	0	0.0	(0, 0)	0	0.0	(0, 0)	3.4	(1.8, 6.3)
GP13a	Work or school problems because of gambling	9,220	0.4	(0.2, 0.7)	6,113	5.8	(2.6, 12.4)	9.3	(6.3, 13.5)
GP13b	Average # of work or school days lost due to gambling	0.2 (-0.1, 0.4)			3.3 (-3.1, 9.7)			1.3 (0.3, 2.4)	
GP13c	Lost job or quit school due to gambling	Cell size ≤ 5			Cell size ≤ 5			3.0	(1.5, 5.7)
GP13d	Received public assistance or welfare payments because of gambling	Cell size ≤ 5			Cell size ≤ 5			3.0	(1.5, 5.7)
GP13e	Average amount of money received from public assistance/welfare because of gambling	\$3.9 (-3.8, 11.6) (see Note)			\$87.6 (-83.8, 258.9) (see Note)			\$19.2 (0.6, 37.8)	
GP14a	Commission of illegal acts because of gambling	11,474	0.5	(0.3, 0.8)	2,890	2.7	(1.1, 6.6)	8.4	(5.7, 12.1)
GP14b	Average amount of money illegally obtained to gamble	\$3.9 (-1.2, 9.1) (see Note)			\$9.4 (-2.6, 21.4) (see Note)			\$40.2 (6.7, 73.7)	
GP14c	Arrested because of gambling	Cell size ≤ 5			Cell size ≤ 5			2.6	(1.4, 5.0)
GP14d	Convicted of offense because of gambling	Cell size ≤ 5			0	0.0	(0, 0)	1.5	(0.6, 3.4)
GP14g	Incarcerated because of gambling	Cell size ≤ 5			0	0.0	(0, 0)	1.5	(0.6, 3.4)
GP14h	Average # days incarcerated because of gambling	0.0 (0, 0)			0.0 (0, 0)			0.3 (0.0, 0.5)	

Note: Weighted data means data that has been weighted to derive population estimates of the number of people (N) in Massachusetts in that category. The unweighted N's are as follows: BGPS Gamblers = 3993; BGPS Problem Gamblers = 129; BOPS Problem Gamblers = 317.

Note: Gamblers are everyone who reported gambling once a month or more in the past year on any gambling format (inclusive of problem gamblers).

Note: Italicized figures indicate a relative standard error > 30%.

Note: In all cases, the figures are for the entire sample of Gamblers or Problem Gamblers (e.g., the figures for GP13e and GP14b would be much higher if limiting the calculation to just people who received public assistance or welfare payments).

Table 5a. Baseline (2013/2014) Impact of Different Forms of Gambling on Gambling-Related Problems in Past 12 Months among BGPS and BOPS Problem Gamblers, Weighted Data

		Baseline General Population Survey PROBLEM GAMBLERS (Weighted N = 105,738)			Baseline Online Panel Survey PROBLEM GAMBLERS (Weighted)	
		N	%	95% C.I.	%	95% C.I.
GP21	Certain types of gambling have contributed to problems more than others	20,758	29.8	(18.0, 44.3)	26.6	(20.7, 33.5)

Table 5b. Baseline (2013/2014) Types of Gambling Contributing to Problems amongst BGPS and BOPS Problem Gamblers Reporting that Certain Types Contributed to their Problems more than Others, Weighted Data

		Baseline General Population Survey PROBLEM GAMBLERS (Weighted N = 105,738)		Baseline Online Panel Survey PROBLEM GAMBLERS (Weighted)	
		%	95% C.I.	%	95% C.I.
GP22	Lottery	<i>Cell size ≤ 5</i>		20.5	(10.5, 35.9)
	Instant Lottery Tickets	22.2	(8.4, 47.0)	23.1	(13.7, 36.3)
	Slot Machines	<i>Cell size ≤ 5</i>		18.6	(9.8, 32.6)
	Sports Betting	<i>Cell size ≤ 5</i>		<i>Cell size ≤ 5</i>	
	Casino Table Games	<i>Cell size ≤ 5</i>		<i>Cell size ≤ 5</i>	
	Online Gambling	<i>Cell size ≤ 5</i>		<i>Cell size ≤ 5</i>	
	Poker	0.0	(0, 0)	<i>Cell size ≤ 5</i>	
	Video Poker	0.0	(0, 0)	<i>Cell size ≤ 5</i>	
	Keno	<i>Cell size ≤ 5</i>		<i>Cell size ≤ 5</i>	
	Bingo	<i>Cell size ≤ 5</i>		<i>Cell size ≤ 5</i>	
	Horse Racing	0.0	(0, 0)	<i>Cell size ≤ 5</i>	
	High Risk Stocks	<i>Cell size ≤ 5</i>		0.0	(0, 0)

Note: Weighted data means data that has been weighted to derive population estimates of the number of people (N) in Massachusetts in that category. The unweighted N's are as follows: BGPS Problem Gamblers = 129; BOPS Problem Gamblers = 317.

Note: Italicized figures indicate a relative standard error > 30%.

Note: Only respondents who scored 5 or higher on the Canadian Problem Gambling Index (CPGI) were asked these questions. CPGI 5+ is roughly equivalent to a PPGM problem gambler designation (Williams, Volberg, & Stevens, 2012).

Table 6. Prevention Awareness and Participation in Past 12 Months among BGPS Gamblers, BGPS Problem Gamblers, and BOPS Problem Gamblers, Weighted Data

		Baseline General Population Survey GAMBLERS (Weighted N = 2,396,524)			Baseline General Population Survey PROBLEM GAMBLERS (Weighted N = 105,738)			Baseline Online Panel Survey PROBLEM GAMBLERS (Weighted)	
		N	%	95% C.I.	N	%	95% C.I.	%	95% C.I.
PA1	Heard or seen any media campaigns to prevent problem gambling in Massachusetts	1,172,261	48.9	(46.7, 51.2)	52,890	50.0	(38.4, 61.6)	47.4	(41.3, 53.5)
PA2a	Aware of any programs to prevent problem gambling at school, work, or in community	391,441	16.3	(14.8, 18.0)	26,486	25.0	(17.0, 35.3)	31.8	(26.3, 37.9)
PA2b	Participated in any programs to prevent problem gambling at school, work, or in community	<i>4,566</i>	<i>0.2</i>	<i>(0.1, 0.4)</i>	<i>Cell size ≤ 5</i>			7.1	(4.6, 10.7)
PA3	Media campaigns or prevention programs altered gambling behavior	29,641	1.2	(0.7, 2.2)	5,072	4.8	(2.2, 10.3)	7.6	(5.1, 11.1)

Note: Weighted data means data that has been weighted to derive population estimates of the number of people (N) in Massachusetts in that category. The unweighted N's are as follows: BGPS Gamblers = 3993; BGPS Problem Gamblers = 129; BOPS Problem Gamblers = 317.

Note: Gamblers refers to everyone who reported gambling once a month or more in the past year on any gambling format (inclusive of problem gamblers).

Note: Italicized figures indicate a relative standard error > 30%.

Table 7. Treatment Seeking in Past 12 Months among BGPS Problem Gamblers and BOPS Problem Gamblers, Weighted Data

		Baseline General Population Survey PROBLEM GAMBLERS (Weighted N = 105,738)			Baseline Online Panel Survey PROBLEM GAMBLERS (Weighted)	
		N	%	95% C.I.	%	95% C.I.
GP23a	Wanted help for gambling problems	9,187	13.0	(5.4, 28.4)	25.4	(19.7, 32.0)
GP23b	Sought help for gambling problems	<i>Cell size ≤ 5</i>			16.1	(11.1, 22.7)
GP23e	Entered into casino self-exclusion agreement	16,785	23.8	(12.4, 40.7)	24.5	(18.8, 31.1)

Note: Weighted data means data that has been weighted to derive population estimates of the number of people (N) in Massachusetts in that category.

The unweighted N's are as follows: BGPS Problem Gamblers = 129; BOPS Problem Gamblers = 317.

Note: Only respondents who scored 5 or higher on the Canadian Problem Gambling Index (CPGI) were asked the questions about help-seeking (GP23a,b,c,d,e,f). CPGI 5+ is roughly equivalent to a PPGM problem gambler designation (Williams, Volberg, & Stevens, 2012).

Note: Italicized figures indicate a relative standard error > 30%.

Note: For individuals reporting casino self-exclusion, a follow-up question (GP23f) asked about which state this self-exclusion was made in. The only state with sufficient responses to provide a reliable estimate was Connecticut, at 65.2% (BOPS).

Summary of Findings

One of the main purposes of the 2013/2014 Baseline Online Panel Survey (BOPS) was to obtain a larger set of problem gamblers beyond what was achieved in the Baseline General Population Survey (BGPS) so as to obtain more reliable estimates concerning a) the negative impacts of gambling; b) the differential impact of different forms of gambling on gambling-related problems; and c) prevention awareness and treatment-seeking behavior of problem gamblers. This information is useful both for purposes of treatment planning and to help establish baseline levels of impacts prior to the introduction of casino gambling to Massachusetts in 2015 – 2019 (with a planned follow-up online panel [FOPS] in 2020 examining changes from baseline). Our goal was achieved in that a total of 317 problem and pathological gamblers were identified in the BOPS, compared to the 129 problem gamblers identified in the BGPS, even though the sample size of the BGPS was nearly double that of the BOPS. Having achieved this goal, our next objective was to determine how similar BOPS problem gamblers were to the BGPS problem gamblers. Modest, but significant differences between the groups were found in a subset of variables. Hence, the results of each of the groups were reported separately.

The main findings of this study are summarized below. It should be noted that even with the larger sample of problem gamblers in the BOPS, there are several indices where the relative standard error continues to be greater than 30%. As was the case in reporting results from the Baseline General Population Survey report (Volberg et al., 2015), the following discussion focuses on estimates where the relative standard error is less than 30%.

Negative Impacts of Gambling

- **Financial problems** are the most commonly reported negative impact of gambling among both the general population of Massachusetts gamblers (3.8%) as well as Massachusetts problem gamblers more specifically (48.0% BGPS; 54.2% BOPS). Bankruptcy is a considerably less common financial impact, reported in only 5.2% of BOPS problem gamblers. With an estimated 105,738 problem gamblers in Massachusetts (from the BGPS), this potentially represents 5,498 bankruptcies. This projected figure is almost certainly too high, as in 2014 there were a total of 10,394 total bankruptcy filings in Massachusetts, 9,951 of which were non-business filings (U.S. Courts, 2014).⁹ However, it is consistent with other literature showing that bankruptcies are reliably associated with problem gambling (Petry, 2005) as well as being one of the most consistent impacts of increased gambling availability (see Williams, Rehm, & Stevens, 2011 for a review).
- **Health or stress-related problems** are also a very common negative impact, reported in 3.8% of gamblers and between 47.7% (BGPS) and 49.6% (BOPS) of problem gamblers. A relatively small percentage of people with health or stress-related problems reported seeking medical or psychological help for these problems (3.9% BGPS and 8.7% BOPS), which would represent between 4,114 and 9,199 problem gamblers a year. The lower rate of treatment seeking among the BGPS problem gamblers may be due to their older age, as there is a tendency for older people to be less likely to seek psychological help (e.g., Mackenzie et al., 2006). (Further discussion of this issue is presented below in the Prevention Awareness and Treatment Seeking section).

⁹ Medical expenses account for the majority of bankruptcies in the United States (Himmelstein et al., 2009) as well as in Massachusetts (Himmelstein et al., 2011).

- Significant **mental health problems** in the form of guilt, anxiety, or depression is the third most common negative impact of gambling, reported in 3.2% of gamblers and between 31.4% (BOPS) and 36.5% (BGPS) of problem gamblers. An uncommon, but important manifestation of this mental stress is suicidal ideation and attempts. An estimated 4.4% of BOPS problem gamblers reported suicidal ideation, which would represent 4,652 individuals. The number of people who reported actual suicide attempts due to their gambling is lower, but no reliable estimates exist, as suicide attempts were only reported by one BGPS problem gambler and ten BOPS problem gamblers. As reference points, there were 585 known suicides in Massachusetts in 2013 (MA Department of Public Health, 2016) while the Centers for Disease Control and Prevention estimate the ratio of suicidal ideation to suicide attempts to be roughly 7.2 to 1 and the ratio of suicide attempts to completed suicides to be roughly 35 to 1 (Centers for Disease Control & Prevention, 2015).
- **Relationship problems** is the fourth most common negative impact of gambling, reported in 1.1% of gamblers compared to 13.7% (BOPS) and 18.8% (BGPS) of problem gamblers. Four discrete manifestations of relationship problems are: domestic violence, separation or divorce, neglect of children or family, and child welfare services involvement. A total of 9.1% (BOPS) of problem gamblers (n = 9,622) reported neglecting their children or family because of gambling; 5.2% (BOPS) (n = 5,498) reported domestic violence due to gambling; and 3.7% (BOPS) (n = 3,912) reported separation or divorce due to gambling. As a reference point, there were 12,725 divorces in 2009 in Massachusetts (Centers for Disease Control & Prevention, 2010). Child welfare involvement was the least common discrete relationship impact reported, but no reliable figures exist (reported by none of the BGPS problem gamblers and only 11 BOPS problem gamblers).
- **Work or school problems** is a relatively uncommon negative impact of gambling, rarely reported among gamblers and reported by just 9.3% (BOPS) of problem gamblers. Losing one's job or having to quit school is even less common, but no reliable estimates exist (reported by three BGPS problem gamblers and ten BOPS problem gamblers). Similarly, receiving public assistance and/or welfare payments is very uncommon, but no reliable estimates exist (reported by two BGPS problem gamblers and ten BOPS problem gamblers).
- **Committing illegal acts** because of gambling is the least common negative impact of gambling, reported in 0.5% of gamblers and 8.4% (BOPS) of problem gamblers. Being arrested, convicted, and incarcerated because of gambling are much less common than this, but no reliable estimates exist. (Being arrested was reported by two BGPS problem gamblers and ten BOPS problem gamblers. Being convicted was reported by none of the BGPS problem gamblers and by six BOPS problem gamblers. Being incarcerated was reported by none of the BGPS problem gamblers and by six BOPS problem gamblers). As reference points, there were 144,450 property crime offenses and 26,819 violent crime offenses in Massachusetts in 2012 (Government of Massachusetts, 2014a,b) and there were 10,813 inmates incarcerated in Massachusetts in 2015 (Government of Massachusetts, 2016).

Impacts of Different Forms of Gambling on Gambling-Related Problems

- Only a minority of problem gamblers (29.8% BGPS and 26.6% BOPS) reported that there was a certain type or types of gambling that contributed to their problems more than others. This is consistent with other research which has found that problem gamblers tend to patronize a variety of gambling formats, each of which makes some contribution to the harms experienced (the mean number of formats engaged in by problem gamblers was 4.5 in the BGPS and 5.1 in the BOPS).
- For the minority who did report that a particular type of gambling was more problematic than others, low numbers preclude arriving at reliable estimates for each format. That being said, there was no single format that was overwhelmingly endorsed relative to others (every format had some endorsement), and instant tickets was the only format with sufficient endorsement to have a

reliable estimate: 23.1% BOPS. This finding diverges from other research which has tended to find continuous forms of gambling (e.g., slot machines, casino table games) and online gambling to be more problematic than other forms (Dowling, Smith & Thomas, 2005; Parke & Griffiths, 2007; Welte, Barnes, Wieczorek, Tidwell, & Hoffman, 2007; Williams, West & Simpson, 2012; Wood, Williams & Parke, 2012). It is worth noting that slot machines, casino table games, and online gambling are not yet widely available in Massachusetts. It will be instructive to observe whether these figures change subsequent to casino introduction.

Prevention Awareness and Treatment Seeking Behavior of Problem Gamblers

- About half of Massachusetts gamblers (48.9% BGPS) reported having heard or seen media campaigns to prevent problem gambling in Massachusetts in the previous 12 months. Surprisingly, despite having considerably more interaction with gambling products, the level of awareness was not noticeably higher among problem gamblers: 50.0% BGPS and 47.4% BOPS.
- Significantly fewer gamblers were aware of any actual programs to prevent problem gambling at school, work, or in the community (16.3% BGPS). In contrast to awareness of media campaigns to prevent problem gambling, the level of awareness of programs to prevent problem gambling at school, work, or in the community was noticeably higher among problem gamblers: 25.0% BGPS and 31.8% BOPS. In addition, an estimated 7.1% of BOPS problem gamblers reported having participated in such a program.
- A total of 1.2% of BGPS gamblers and 7.6% of BOPS problem gamblers indicated that these media campaigns and/or programs altered their actual gambling behavior.
- Divergence in results between BGPS and BOPS problem gamblers was noted for treatment-seeking, with 25.4% of BOPS problem gamblers reporting wanting help for gambling problems, 16.1% reporting seeking help for gambling problems, and 24.5% reporting having entered into a casino self-exclusion agreement in another state. By comparison, the figures were too low to arrive at reliable estimates for the BGPS problem gamblers (only three BGPS problem gamblers reported having sought out treatment). As mentioned earlier, this may be related to the significantly older age of the BGPS sample of problem gamblers and the fact that older people are less likely to seek psychological help (e.g., Mackenzie et al., 2006). Nonetheless, in general, these figures are consistent with findings from a very similar question reported earlier in this report concerning whether problem gamblers reported seeking medical or psychological help for health-related problems caused by their gambling (endorsed by only 3.9% of BGPS problem gamblers and 8.7% of BOPS problem gamblers). This low rate of treatment seeking is consistent with other literature indicating that typically less than 10% of problem gamblers seek out formal treatment (Braun et al., 2014; Cunningham, 2005; Slutske, 2006; Suurvali et al., 2008). In a review of the literature the main reasons for not seeking out treatment were a wish to handle the problem by oneself; shame/embarrassment/stigma; unwillingness to admit problem; and issues with treatment itself (Suurvali et al., 2009).

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Appendix A: SEIGMA BASELINE ONLINE PANEL SURVEY QUESTIONNAIRE

RECRUITMENT

Subject Line: New Survey on Health and Recreational Behavior

Invite e-mail text intro:

The University of Massachusetts is conducting a study about health and recreational behavior in Massachusetts. This is a research study. Taking part is up to you. You don't have to answer any question you don't want to, and you can stop at any time. There are no risks or benefits to you participating. However, some of the questions do ask about sensitive issues. If you feel upset after completing the study and would like assistance, we will provide you with telephone numbers for appropriate local treatment resources at the end of the interview. This study will take about 10-15 minutes and your answers will be kept secure and private. You will receive 45 points for completing this survey. We do not need to know your name and any contact information will be removed from the data set once data collection is completed. The results of the survey will be reported for groups of people, not individuals.

If you have questions about this project or if you have a research-related problem, you may contact Dr. Rachel Volberg at (413) 545-6700. If you have questions concerning your rights as a research subject, you may contact the University of Massachusetts Amherst Human Research Protection Office (HRPO) at (413) 545-3428 or humansubjects@ora.umass.edu. If you have questions about Ipsos Public Affairs USA, you may contact the company at (202) 463-7300.

D2. What is your sex?

- Male (1)
- Female (2)

D3. In what year were you born? Please enter the year you were born in the box below
_____ [MUST BE 4-DIGIT NUMBER; RANGE 1900 – 2013]

- Prefer not to respond (9999)

[PROG: ALLOW ALL RESPONDENTS BORN IN 1995 OR EARLIER TO CONTINUE ONTO C1. RESPONDENTS BORN IN 1996 TO 2013, THANK AND TERMINATE. RESPONDENT MUST BE AGE 18 OR OLDER TO CONTINUE.]

COMORBIDITIES

C1. Which of the following is your preferred recreational activity? Please select one response

- Watching TV (1)
- Walking or hiking (2)
- Gardening (3)
- Reading (4)
- Socializing with friends or family (5)
- Travelling (6)
- Gambling (7)
- Other _____

C2. Do you enjoy participating in extreme sports such as hang gliding or sky diving?

- Yes (1)
- No (0)

C3. Over the past 12 months, would you say that in general your health has been excellent, very good, good, fair or poor? Please select one response

- Excellent (1)
- Very good (2)
- Good (3)
- Fair (4)
- Poor (5)

C4. In the past 12 months, how would you rate your overall level of stress? Please select one response

- Very high (5)
- High (4)
- Moderate (3)
- Low (2)
- Very low (1)

C5. In the past 12 months, how would you rate your overall level of happiness? Please select one response

- Very high (5)
- High (4)
- Moderate (3)
- Low (2)
- Very low (1)

C6a. Have you smoked at least 100 cigarettes in your entire life?

- Yes (1)
- No (0)

[PROG: IF C6a = Yes, CONTINUE WITH C6b; ELSE, GO TO C6c]

C6b. Do you now smoke cigarettes every day, some days, or not at all? Please select one response

- Every day (1)
- Some days (2)
- Not at all (3)

C6c. Do you currently smoke cigars, pipe tobacco, or hookah tobacco (shisha); or use dipping tobacco (including snus), chewing tobacco, or snuff, every day, some days, or not at all? Please select one response

- Every day (1)
- Some days (2)
- Not at all (3)

C6d. During the past 30 days, how many days would you estimate you have used any form of tobacco?

_____ [PROG: NUMERIC TEXT BOX; RANGE 0 – 30]

C7a. Have you used alcohol in the past 12 months?

- Yes (1)
- No (0)

[PROG: IF C7a = YES, CONTINUE WITH C7b; ELSE GO TO C8]

C7b. During the past 30 days, how many days per week or per month did you have at least one drink of any alcohol beverage such as beer, wine, a malt beverage or liquor? Please answer either in days per week OR in days per month

_____ days per week [PROG: NUMERIC TEXT BOX; RANGE 0 – 7]

OR

_____ days per month [PROG: NUMERIC TEXT BOX; RANGE 0 – 30]

[PROG: IF RESPONDENT GIVES AN ANSWER OF 1 OR MORE TO EITHER DAYS PER WEEK OR DAYS PER MONTH, CONTINUE WITH C7C. RESPONDENT MAY ONLY RESPOND TO ONE OPTION – ONLY ONE OF THESE CAN BE USED BY EACH RESPONDENT.]

[PROG: IF C7B_DAYS PER WEEK OR C7B_DAYS PER MONTH = 0, OR IF C7B = DON'T KNOW OR PREFER NOT TO ANSWER, SKIP TO C8; IF C7B_DAYS PER WEEK OR C7B_DAYS PER MONTH = 1 OR MORE, CONTINUE WITH C7C.]

C7c. One drink is equivalent to a 12-ounce beer, a 5-ounce glass of wine, or a drink with one shot of liquor. During the past 30 days, on the days when you drank, about how many drinks did you drink on the average? Please enter the average number of drinks per day you had on days that you drank in the box below

_____ number of drinks [PROG – NUMERIC TEXT BOX; RANGE 1 – ??20]

- Don't know/Not sure (8888)
- Prefer not to answer (9999)

C7d. Considering all types of alcoholic beverages, how many times during the past 30 days did you have [PROG: IF D2 = MALE, INSERT "5"; IF D2 = FEMALE, INSERT "4" – JUST INSERT THE NUMBER, NOT THE QUOTE MARKS] or more drinks on an occasion? Please enter number in the box below

_____ Number of times [PROG – NUMERIC TEXT BOX, RANGE 0 – 30]

- Don't know/Not sure (8888)
- Prefer not to answer (9999)

C8. In the past 12 months have you used any cannabis, hallucinogens (such as LSD, mushrooms, or PCP), cocaine, heroin or opium, or any other drugs not intended for medical use? Non-medical" drug use means using it to get high or experience pleasurable effects, see what the effects are like, or use with friends.

- Yes (1)
- No (0)
- Prefer not to answer (9999)

C9a. Have you had any problems with drugs or alcohol in the past 12 months? By this we mean difficulties in controlling their use that have led to negative consequences for you or other people.

- No (0)
- Yes (1)
- Prefer not to answer (9999)

[PROG: IF C9a = YES, CONTINUE WITH C9b; ELSE, SKIP TO C10a]

C9b. During the past 12 months, have you sought help for your use of alcohol or drugs?

- No (0)
- Yes (1)
- Prefer not to answer (9999)

If you would like more information regarding treatment resources, please contact the Massachusetts Substance Abuse Information and Education Helpline 800-327-5050 TTY: 617-536-5872 or the Drug & Alcohol Treatment Hotline (National) at 800-662-HELP.

C10a. Have you had any problems with other behavior in the past 12 months such as overeating, sex or pornography, shopping, exercise, Internet chat lines, or other things? What we mean is difficulties controlling the behavior which has led to significant negative consequences for you or other people.

- Yes (1)
- No (0)
- Prefer not to answer (9999)

[PROG: IF C10a = YES, CONTINUE WITH C10b; ELSE, SKIP TO C11a]

C10b. Which specific activities have you had problems with? Have you had problems with...Please select all that apply

- Over-eating (1)
- Sex or pornography (2)
- Exercise (3)
- Shopping (4)
- Internet chat lines (5)
- Video or Internet gaming (6)
- Other _____ (91)

[PROG: RANDOMIZE FIRST 6 ITEMS; "OTHER", "NOT SURE", AND "PREFER NOT TO ANSWER" ALWAYS IN ORDER AND ALWAYS LAST]

C11a. In the past 30 days, have you had any serious problems with depression, anxiety or other mental health problems? In this case, 'serious' means something that either you or someone else would say is considerable, important, or major', either because of its frequency or significance.

- Yes (1)
- No (0)
- Not sure (8888)
- Prefer not to answer (9999)

[PROG: IF C11a = No, CONTINUE WITH C11b; ELSE, SKIP TO C12]

C11b. How about in the last 12 months?

- Yes (1)
- No (0)
- Not sure (8888)
- Prefer not to answer (9999)

[PROG: IF C11b = YES, CONTINUE WITH C11c; ELSE SKIP TO C12]

C11c. Which one(s) _____

If you would like more information regarding treatment resources, please contact the National Alliance on Mental Illness (NAMI) 1-800-950-NAMI (6264) or Samaritans' at 877-870-4673.

C11d. During the past 12 months, did you ever seriously consider attempting suicide?

- Yes (1)
- No (0)
- Prefer not to answer (9999)

[PROG: IF C11d = YES OR NOT SURE, CONTINUE WITH C11e; ELSE SKIP TO C12]

C11e. During the past 12 months, did you actually attempt suicide?

- Yes (1)
- No (0)
- Prefer not to answer (9999)

If you would like more information regarding treatment resources, please contact Samaritans' at 877-870-4673. There is also the National Suicide Prevention Lifeline at 1-800-273-TALK (8255).

C12. Do you now have any health problem that requires you to use special equipment, such as a cane, a wheelchair, a special bed, or a special telephone?

- Yes (1)
- No (0)

C13. How would you describe your childhood? Please select one response

- Very happy (1)
- Happy (2)
- Neither happy or unhappy (3)
- Unhappy (4)
- Very unhappy (5)

GAMBLING ATTITUDES

Now, the primary recreational activity we have chosen to ask you about is gambling. Before we start, we would like to provide our definition of gambling: We define gambling as betting money or material goods on an event with an uncertain outcome in the hopes of winning additional money or material goods. It includes things such as lottery tickets, scratch tickets, bingo, betting against a friend on a game of skill or chance, betting on horse racing or sports, investing in high risk stocks, where a high risk stock means a stock from a company that has a real risk of going out of business and/or having their stock price double or triple in value in the next year.

GA1. Which best describes your belief about the benefit or harm that gambling has for society? Please select one response

- The harm far outweighs the benefits (-2)
- The harm somewhat outweighs the benefits (-1)
- The benefits are about equal to the harm (0)
- The benefits somewhat outweigh the harm, or (+1)
- The benefits far outweigh the harm (+2)
- Not sure (8888)

GA2. Do you believe that gambling is morally wrong? Please select one response

- No (+1)
- Yes (-1)
- Not sure (0)

GA3a. Which of the following best describes your opinion about legalized gambling? Please select one response

- All types of gambling should be legal (+1)
- Some types of gambling should be legal and some should be illegal. (0)
- All types of gambling should be illegal. (-1)
- Not sure (8888)

[PROG: IF GA3a = "SOME TYPES", CONTINUE WITH GA3b; ELSE, SKIP TO GA4]

GA3b. Which types do you believe should be illegal? Please select all that apply

- Lottery (1)
- Instant ticket (2)
- Keno (3)
- Bingo (4)
- Slot machines (5)
- Video poker machines (6)
- Casino table games (i.e., blackjack, baccarat, roulette, craps, etc. (7)
- Poker (8)
- Horse racing (9)
- Dog racing (10)
- Sports Betting (11)
- High risk stocks, options, futures, or day trading (12)
- Online gambling (13)

- Other _____ (91) [PROG: INCLUDE TEXT BOX WITH "OTHER"]
- Not sure (8888)

GA4. Which of the following best describes your opinion about gambling opportunities in Massachusetts? Please select one response

- Gambling is too widely available (-1)
- Gambling is not available enough, or (1)
- The current availability of gambling is fine. (0)
- Not sure (8888)

GA5. There will be 3 new casinos and a slot parlor built in Massachusetts in the next few years. What sort of overall impact do you believe these will have? Please select one response

- Very beneficial (+2)
- Somewhat beneficial (+1)
- Neither beneficial nor harmful (0)
- Somewhat harmful, or (-1)
- Very harmful (-2)
- Not sure (8888)

GA6a. What do you believe will be the single most positive impact for Massachusetts? Please select one response
Employment (1)

- Benefit to other local businesses (2)
- Increased government revenue (3)
- Retaining money that was leaving Massachusetts (4)
- Increased local leisure options (i.e., the ability to gamble locally) (5)
- No positive impacts (6)
- Other _____ [PROG: INCLUDE A TEXT BOX WITH "OTHER"]
- Not sure (8888)

GA6b. What do you believe will be the single most negative impact for Massachusetts? Please select one response

- Increased gambling addiction (and associated consequences: bankruptcy, suicide, divorce, etc.) (1)
- Negative impact on other local businesses (2)
- Increased crime (3)
- Increased traffic congestion (4)
- No negative impacts (5)
- Other _____
- Not sure (8888)

GA7. What sort of overall impact do you believe a new casino or slot parlor would have for your own community? Please select one response

- Very beneficial (+2)
- Somewhat beneficial (+1)
- Neither beneficial nor harmful (0)
- Somewhat harmful, or (-1)
- Very harmful (-2)
- Not sure (8888)

GAMBLING BEHAVIOR

GY1a. In the past 12 months, how often have you purchased lottery tickets such as Megabucks, Powerball, Lucky for Life, or Mass Cash? Please select one response

- 4 or more times a week (6)
- 2-3 times a week (5)
- Once a week (4)
- 2-3 times a month (3)
- Once a month (2)
- Less than once a month, or (1)
- Not at all (0)

[PROG: IF GY1a = NOT AT ALL, SKIP TO GY2a; ELSE, CONTINUE WITH GY1b]

GY1b. Roughly how much money do you spend on lottery tickets in a typical month? Spend means how much you are ahead (+\$) or behind (-\$), or your net win or loss in an average month in the past 12 months.

-\$ _____

[PROG: THERE MAY BE ONLY ONE RESPONSE IN GY1b; RESPONDENTS MAY NOT FILL NUMBERS INTO MORE THAN ONE BOX, OR INDICATE MULTIPLE RESPONSES]

GY2a. In the past 12 months, how often have you purchased instant tickets or pull tabs? Would you say about Please select one response

- 4 or more times a week (6)
- 2-3 times a week (5)
- Once a week (4)
- 2-3 times a month (3)
- Once a month (2)
- Less than once a month, or (1)
- Not at all (0)

[PROG: IF GY2a = "NOT AT ALL", SKIP TO GY3a; ELSE, CONTINUE WITH GY2b]

GY2b. Roughly how much money do you spend on instant tickets or pull tabs in a typical month?

Please enter a number in one of the boxes below or select one of the other responses

-\$ _____

[PROG: THERE MAY BE ONLY ONE RESPONSE IN GY2b; RESPONDENTS MAY NOT FILL NUMBERS INTO MORE THAN ONE BOX, OR INDICATE MULTIPLE RESPONSES]

GY2c. In the past 12 months, how often have you purchased *raffle tickets*? Would you say about...

- 4 or more times a week (6)
- 2-3 times a week (5)
- Once a week (4)
- 2-3 times a month (3)
- Once a month (2)
- Less than once a month, or (1)
- Not at all (0)

GY2d. Roughly how much money do you spend on raffle tickets in a typical month?

-\$ _____

GY3a. In the past 12 months, how often have you purchased keno or daily race game tickets? Please select one response

- 4 or more times a week (6)
- 2-3 times a week (5)
- Once a week (4)
- 2-3 times a month (3)
- Once a month (2)

- Less than once a month, or (1)
- Not at all (0)

[PROG: IF GY3a = "NOT AT ALL", SKIP TO GY4a; ELSE, CONTINUE WITH GY3b]

GY3b. Roughly how much money do you spend on keno or daily race game tickets in a typical month? -
-\$ _____

GY4a. In the past 12 months, how often have you bet money on sporting events (this includes sports pools)?
Please select one response

- 4 or more times a week (6)
- 2-3 times a week (5)
- Once a week (4)
- 2-3 times a month (3)
- Once a month (2)
- Less than once a month, or (1)
- Not at all (0)
- Not sure (8888)

[PROG: IF GY4a = "NOT AT ALL", SKIP TO GY5a; ELSE, CONTINUE WITH GY4b]

GY4b. Roughly how much money do you spend on sports betting in a typical month?
-\$ _____

GY5a. In the past 12 months, how often have you gone to a bingo hall to gamble? Please select one response

- 4 or more times a week (6)
- 2-3 times a week (5)
- Once a week (4)
- 2-3 times a month (3)
- Once a month (2)
- Less than once a month, or (1)
- Not at all (0)

[PROG: IF GY5a = "NOT AT ALL", SKIP TO GY8a; ELSE, CONTINUE WITH GY5b]

GY5b. Roughly how much money do you spend at bingo halls in a typical month?
-\$ _____

GY8a. In the past 12 months, how many times have you gambled at a casino, racino, or slots parlor outside of Massachusetts? Please enter the number of times in the box below

_____ [PROG: NUMERIC TEXT BOX, RANGE 0 - ??]

[PROG: IF GY8a = 0, SKIP TO GY9a; ELSE, CONTINUE WITH GY8b]

GY8b. Roughly how much money do you spend on gambling per visit in out of state casino/racino/slots parlor/slots at racetrack gambling.

-\$ _____

GY8c. Roughly how much money do you spend on nongambling activities (such as food, travel, lodging, entertainment) per visit in out of state casino/racing/slots parlor/slots at racetrack gambling?

-\$ _____

GY8d. Which state do you most often go to for this gambling? Please enter the state name below

GY8e. Which specific casino, racing, or slots parlor do you most often go to?

GY9a. In the past 12 months, how often have you bet on a horse race at either a horse race track or an off-track site? Please select one response

- 4 or more times a week (6)
- 2-3 times a week (5)
- Once a week (4)
- 2-3 times a month (3)
- Once a month (2)
- Less than once a month, or (1)
- Not at all (0)

[PROG: IF GY9a = "NOT AT ALL", SKIP TO GY10a; ELSE, CONTINUE WITH GY9b]

GY9b. Roughly how much money do you spend on horse racing in a typical month?

-\$_____

GY9c. Where do you most often go to bet on horse racing?

GY10a. In the past 12 months, how often have you gambled or bet money against other people on things such as card games; golf, pool, darts, bowling; video games; board games, or poker outside of a casino? Would you say... Please select one response

- 4 or more times a week (6)
- 2-3 times a week (5)
- Once a week (4)
- 2-3 times a month (3)
- Once a month (2)
- Less than once a month, or (1)
- Not at all (0)

[PROG: IF GY10a = "NOT AT ALL", SKIP TO GY11a; ELSE, CONTINUE WITH GY10b]

GY10b. Roughly how much money do you spend gambling or betting money against other people in a typical month?

-\$_____

GY11a. In the past 12 months, how often did you purchase high risk stocks, options or futures or day trade on the stock market? Please select one response

- 4 or more times a week (6)
- 2-3 times a week (5)
- Once a week (4)
- 2-3 times a month (3)
- Once a month (2)
- Less than once a month, or (1)
- Not at all (0)

[PROG: IF GY11a = "NOT AT ALL", SKIP TO GY12a; ELSE, CONTINUE WITH GY11b]

GY11b. What do you estimate is your net loss or gain in a typical month from high risk stocks, options, futures, or day trading?

\$_____ Gain in a typical month [PROG: NUMERIC TEXT BOX; RANGE 1 = ?????]

OR

\$_____ Loss in a typical month [PROG: NUMERIC TEXT BOX; RANGE 1 = ?????]

GY12a. In the past 12 months, have you gambled online? This would include things such as playing poker, buying lottery tickets, betting on sports, bingo, slots or casino table games for money or playing interactive games for money? Please select one response

- Yes (1)
- No (0)

[PROG: IF GY12a = "NO", SKIP TO INSTRUCTION BEFORE GM1; ELSE, CONTINUE WITH GY12b]

GY12b. Roughly how much money do you spend gambling online in a typical month?

-\$ _____

GY12c. What is the main type of online gambling you engage in?

[PROG: IF GY1a = "NOT AT ALL" AND GY2a = "NOT AT ALL" AND GY3a = "NOT AT ALL" AND GY4a = "NOT AT ALL" AND GY5a = "NOT AT ALL" AND GY6a = "NOT AT ALL" AND GY7a = "NOT AT ALL" AND GY8a = "NOT AT ALL" AND GY9a = "NOT AT ALL" AND GY10a = "NOT AT ALL" AND GY11a = "NOT AT ALL" AND GY12a = "NOT AT ALL" , AUTOPUNCH "NOT AT ALL IMPORTANT" TO GR1 AND GR2, AND SKIP TO PA1; ELSE, CONTINUE WITH GM1]

GAMBLING MOTIVATION

GM1. What would you say is the main reason that you gamble? Please select one response

- For excitement/entertainment/fun (1)
- To win money (2)
- To escape or distract yourself (3)
- To socialize with family or friends (4)
- To support worthy causes, or (5)
- Because it makes you feel good about yourself (6)
- Other _____ (91)

GAMBLING RECREATION

GR1. How important is gambling to you as a recreational activity? Please select one response

- Very important (3)
- Somewhat important (2)
- Not very important (1)
- Not at all important (0)

GR2a. Has gambling replaced other recreational activities for you in the past 5 years? Please select one response

- No (0)
- Yes (1)

[PROG: IF GR2a = "NO" OR "NOT SURE" OR "PREFER NOT TO ANSWER", SKIP TO PA1; ELSE, CONTINUE WITH GR2b]

GR2b. Which recreational activities has gambling replaced? Please enter the activities in the box below

GAMBLING PROBLEMS

PA1. In the past 12 months have you seen or heard any media campaigns to prevent problem gambling in Massachusetts? Please select one response

- Yes (1)
- No (0)

PA2a. In the past 12 months have you been aware of any programs to prevent problem gambling (other than media campaigns) offered at your school, your place of work, in your community or elsewhere? Please select one response

- Yes (1)
- No (0)
- [PROG: IF PA2a = "YES", CONTINUE WITH PA2b; ELSE, SKIP TO PA3]

PA2b. Did you participate in any of the problem gambling prevention programs that you heard of in the past 12 months? Please select one response

- Yes (1)
- No (0)

PA3. Did any of these media campaigns or programs cause you to alter your own gambling behavior? Please select one response

- Yes (1)
- No (0)

GP01. What portion of your close friends and family members are regular gamblers? Please select one response

- None of them (0)
- Some of them (1)
- Most of them (2)
- All of them (3)

GP02. During the last 12 months, has there been a person in your life that you consider gambles too much? Please select one response

- Yes (1)
- No (0)
- [PROG: IF GP02 = "NO", SKIP TO CPG1; ELSE, CONTINUE WITH GP03]

GP03. What is this person's relationship to you? Please select one response

- Spouse/partner (1)
- Parent/step parent (2)
- Child/step child (3)
- Other person (in your household) (4)
- Other family member (not in your household) (5)
- Ex-partner (6)
- Work colleague (7)
- Friend (8)
- Neighbour (9)
- Other person (10) Please specify the relationship to this person

GP04. In what way/ways has this person's gambling affected you during the last 12 months? Please select all that apply

- Reduced time spent socializing (1)
- Not done their agreed share of household chores (2)
- Failed to do something they had promised or were supposed to do (3)
- Emotional pain or neglect (4)
- Made it difficult to cover household expenses (5)
- Stolen money or valuables (6)
- Other ways. Please specify the other ways _____

GP05. Overall, on a scale from 1 to 10 how much has this person's gambling affected you negatively during the last 12 months? Please select one response

- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9
- 10

[PROG: IF GY1a = "NOT AT ALL" AND GY2a = "NOT AT ALL" AND GY3a = "NOT AT ALL" AND GY4a = "NOT AT ALL" AND GY5a = "NOT AT ALL" AND GY6a = "NOT AT ALL" AND GY7a = "NOT AT ALL" AND GY8a = "NOT AT ALL" AND GY9a = "NOT AT ALL" AND GY10a = "NOT AT ALL" AND GY11a = "NOT AT ALL" AND GY12a = "NOT AT ALL" , SKIP TO D4; ELSE, CONTINUE WITH CPGI1]

When answering the questions throughout the remainder of the survey, please think about the past 12 months. Please select one response for each question.

CPGI1. Have you bet more than you could really afford to lose?

- Never (0)
- Sometimes (1)
- Most of the time, or (2)
- Almost always (3)
- Prefer not to answer (9999)

CPGI2. Have you felt guilty about the way you gamble or what happens when you gamble?

- Never (0)
- Sometimes (1)
- Most of the time, or (2)
- Almost always (3)
- Prefer not to answer (9999)

CPGI3. Have you needed to gamble with larger amounts of money to get the same feeling of excitement?

- Never (0)
- Sometimes (1)
- Most of the time, or (2)
- Almost always (3)
- Prefer not to answer (9999)

CPGI4. When you gambled, did you go back another day to try to win back the money you lost?

- Never (0)
- Sometimes (1)
- Most of the time, or (2)
- Almost always (3)
- Prefer not to answer (9999)

CPGI5. Have you borrowed money or sold anything to get money to gamble?

- Never (0)
- Sometimes (1)

- Most of the time, or (2)
- Almost always (3)
- Prefer not to answer (9999)

[PROG: GRID, WITH QUESTIONS ALONG THE LEFT AND SCALE “Never”, “Sometimes”, “Most of the time” “Almost always”, “Not sure” and “Prefer not to answer” ALONG THE TOP. DISPLAY QUESTIONS IN ORDER PRESENTED; RESPONSE COLUMNS MUST BE EQUAL SIZED.]

[PROG: IF GPGI5 = “NEVER”, SKIP TO GP6a; ELSE, ASK GP5b]

GP5b. In the past 12 months, about how much money have you borrowed or obtained from selling possessions in order to gamble? Please enter a number in the box below

\$ _____

- Not sure (8888) (go to GP6a)
- Prefer not to answer (9999) (go to GP6a)

GP6a. In the past 12 months, has your gambling caused any financial problems for you or your household? Please select one response

- Never (0)
- Sometimes (1)
- Most of the time, or (2)
- Almost always (3)
- Prefer not to answer (9999)

[PROG: IF GP6a = “NEVER”, SKIP TO GP7a; ELSE, CONTINUE WITH GP6b]

GP6b. In the past 12 months, have you filed for bankruptcy because of gambling? Please select one response

- No (0)
- Yes (1)
- Prefer not to answer (9999)

GP7a. In the past 12 months, has your gambling caused you any health problems, including stress or anxiety? Please select one response

- Never (0)
- Sometimes (1)
- Most of the time, or (2)
- Almost always (3)
- Prefer not to answer (9999)

[PROG: IF GP7a = “NEVER” OR “PREFER NOT TO ANSWER”, SKIP TO GP8; ELSE, CONTINUE WITH GP7b]

GP7b. In the past 12 months have these health problems caused you to seek medical or psychological help? Please select one response

- No (0)
- Yes (1)
- Prefer not to answer (9999)

GP8. In the past 12 months, have people criticized your betting or told you that you had a gambling problem, regardless of whether or not you thought it was true? Please select one response

- Never (0)
- Sometimes (1)
- Most of the time, or (2)
- Almost always (3)
- Prefer not to answer (9999)

GP9. In the past 12 months, have you felt that you might have a problem with gambling? Please select one response

- Never (0)
- Sometimes (1)
- Most of the time, or (2)
- Almost always (3)
- Prefer not to answer (9999)

GP10a. Has your involvement in gambling caused significant mental stress in the form of guilt, anxiety, or depression for you or someone close to you in the past 12 months? Please select one response

- No (0)
- Yes (1)
- Prefer not to answer (9999)

[PROG: IF GP10 = "YES", CONTINUE WITH GP10b; ELSE, SKIP TO GP11a]

GP10b. In the past 12 months, have you thought of committing suicide because of gambling? Please select one response

- No (0)
- Yes (1)
- Prefer not to answer (9999)

[PROG: IF GP10b = "YES", CONTINUE WITH GP10c; ELSE, SKIP TO GP11a]

GP10c. In the past 12 months, have you attempted suicide because of gambling? Please select one response

- No (0)
- Yes (1)
- Prefer not to answer (9999)

GP10d. Would you like to know about the free gambling and mental health treatment services in your local area? Please select one response

- No (0)
- Yes (1)

[PROG: IF GP10d = YES, DISPLAY GP10d2 INTRO SCREEN; ELSE, SKIP TO GP11a]

GP10d2 INTRO SCREEN:

1-800-426-1234 is the Massachusetts Council on Compulsive Gambling's toll-free problem gambling help line. You can also speak directly to your doctor or health provider. Please click the Next button when you are ready to continue with the survey

GP11a. Has your involvement in gambling caused significant problems in your relationship with your spouse/partner or important friends or family in the past 12 months? Please select one response

- No (0)
- Yes (1)
- Prefer not to answer (9999)

[PROG: IF GP11a = "NO", SKIP TO GP12a; ELSE, CONTINUE WITH GP11b]

In the past 12 months, has your involvement in gambling...Please select one response for each question

GP11b. Caused an instance of domestic violence in your household?

GP11c. Resulted in separation or divorce?

- No (0)
- Yes (1)
- Prefer not to answer (9999)

[PROG: GRID WITH QUESTIONS ALONG THE LEFT AND SCALE "NO", "YES", "NOT SURE", AND "PREFER NOT TO ANSWER" ALONG THE TOP; DISPLAY QUESTIONS IN ORDER. RESPONSE COLUMNS MUST BE EQUAL SIZED.]

GP12a. In the past 12 months, has your involvement in gambling caused you to repeatedly neglect your children or family? Please select one response

- No (0)
- Yes (1)
- Prefer not to answer (9999)

[PROG: IF GP12a = "NO", SKIP TO Q13a; ELSE, CONTINUE WITH GP12b]

GP12b. In the past 12 months, has child welfare services become involved because of your gambling? Please select one response

- No (0)
- Yes (1)
- Prefer not to answer (9999)

GP13a. Has your involvement in gambling caused significant work or school problems for you or someone close to you in the past 12 months or caused you to miss a significant amount of time off work or school? Please select one response

- No (0)
- Yes (1)
- Prefer not to answer (9999)

[PROG: IF GP13a = "NO", SKIP TO GP14a; IF GP13a = "NOT SURE" OR "PREFER NOT TO ANSWER", SKIP TO GP13c; IF GP13a = "YES", CONTINUE WITH GP13b]

GP13b. In the past 12 months, about how many work or school days have you lost due to gambling? Please enter a number in the box below

- _____
- Prefer not to answer (9999)

GP13c. In the past 12 months, have you lost your job or had to quit school due to gambling? Please select one response

- No (0)
- Yes (1)
- Prefer not to answer (9999)

[PROG: IF GP13c = YES, CONTINUE WITH GP13d; ELSE, SKIP TO GP14a]

GP13d. In the past 12 months, did anyone in this household receive any public assistance (food stamps, Temporary Assistance for Needy Families (TANF)) or any other welfare payments from the state or local welfare office as a result of losing your job because of gambling? Please select one response

- No (0)
- Yes (1)
- Prefer not to answer (9999)

[PROG: IF GP13d = "NO", CONTINUE WITH GP13e; ELSE, SKIP TO GP14a]

GP13e. Roughly how much money did you receive from public assistance in past 12 months?
\$ _____

GP14a. In the past 12 months, has your involvement in gambling caused you or someone close to you to write bad checks, take money that didn't belong to you or commit other illegal acts to support your gambling? Please select one response

- No (0)
- Yes (1)
- Prefer not to answer (9999)

[PROG: IF GP14a = "YES", CONTINUE WITH GP14b; ELSE, SKIP TO GP15]

GP14b. In the past 12 months, about how much money have you illegally obtained in order to gamble? Please enter the amount in the box below

\$ _____ [PROG: NUMERIC TEXT BOX; RANGE 1 - ????]

- Prefer not to answer (9999)

GP14c. In the past 12 months, has your gambling been a factor in your committing a crime for which you have been arrested? Please select one response

- No (0)
- Yes (1)
- Prefer not to answer (9999)

[PROG: IF GP14c = "YES", CONTINUE WITH GP14d; ELSE, SKIP TO GP15]

GP14d. Were you convicted for this crime? Please select one response

- No (0)
- Yes (1)
- Prefer not to answer (9999)

[PROG: IF GP14d = "YES", CONTINUE WITH GP14e; ELSE, SKIP TO GP15]

GP14e. What was the offence?

- Prefer not to answer (9999)

GP14g. Were you incarcerated for this crime? Please select one response

- No (0)
- Yes (1)
- Prefer not to answer (9999)

[PROG: IF GP14g = "YES", CONTINUE WITH GP14h; ELSE, SKIP TO GP15]

GP14h. How many days were you incarcerated for?

- Prefer not to answer (9999)

GP15. In the past 12 months, have you often gambled longer, with more money or more frequently than you intended to? Please select one response

- No (0)
- Yes (1)
- Prefer not to answer (9999)

GP16a. In the past 12 months, have you made attempts to either cut down, control or stop gambling? Please select one response

- No (0)

- Yes (1)
- Prefer not to answer (9999)

[PROG: IF GP16a = "YES", CONTINUE WITH GP16b; ELSE, SKIP TO GP17]

GP16b. Were you successful in these attempts to cut down, control or stop gambling? Please select one response

- No (1)
- Yes (0)
- Prefer not to answer (9999)

GP17. In the past 12 months, is there anyone else who would say that you had difficulty controlling your gambling, regardless of whether you agreed with them or not? Please select one response

- No (0)
- Yes (1)
- Prefer not to answer (9999)

GP18. In the past 12 months, would you say you have been preoccupied with gambling? Please select one response

- No (0)
- Yes (1)
- Prefer not to answer (9999)

GP19. In the past 12 months, when you did try cutting down or stopping did you find you were very restless or irritable or that you had strong cravings for it? Please select one response

- No (0)
- Yes (1)
- Prefer not to answer (9999)

GP20. In the past 12 months, did you find you needed to gamble with larger and larger amounts of money to achieve the same level of excitement? Please select one response

- No (0)
- Yes (1)
- Prefer not to answer (9999)

[PROG: COMPUTE CPGI INDEX – USE QUESTIONS CPGI1, CPGI2, CPGI3, CPGI4, CPGI5, GP6a, GP7a, GP8, AND GP9.

FOR EACH "Never" RESPONSE, ADD 0; FOR EACH "SOMETIMES" RESPONSE, ADD 1; FOR EACH "MOST OF THE TIME" RESPONSE, ADD 2, AND FOR EACH "ALMOST ALWAYS" RESPONSE, ADD 3. FOR EACH "NOT SURE" RESPONSE, ADD 0; FOR EACH "PREFER NOT TO ANSWER" RESPONSE, ADD 0.]

[PROG: MARKER CPGI INDEX]

[PROG: IF CPGI INDEX = 5 OR MORE, CONTINUE WITH GP21; ELSE, SKIP TO D4]

GP21. Are there particular types of gambling that have contributed to your problems more than others? Please select one response

- No (0)
- Yes (1)

[PROG: IF GP21 = "YES", CONTINUE WITH GP22; ELSE, SKIP TO GP23a]

GP22. Which ones?

GP23a. Have you wanted help for gambling problems in the past 12 months?

- Yes (1)
- No (0)

[PROG: IF GP23a = "NO", SKIP TO GP23e; ELSE, CONTINUE WITH GP23b]

GP23b. Have you sought help for gambling problems in the past 12 months? Please select one response

- Yes (1)
- No (0)

[PROG: IF GP23b = "YES", CONTINUE WITH GP23c; ELSE, SKIP TO GP23e]

GP23c. Where did you seek help from? Please enter your response in the box below

GP23d. How helpful was this? Please select one response

- Very helpful (1)
- Somewhat helpful (2)
- Not very helpful (3)
- Not at all helpful (4)

GP23e. Have you excluded yourself from any casino or slots parlor in the past 12 months? Please select one response

- Yes (1)
- No (0)

[PROG: IF GP23e = "YES", CONTINUE WITH GP23f; ELSE, SKIP TO GP24]

GP23f. In which state?

GP24. Have you had problems with gambling in your lifetime but not in the past 12 months? Please select one response

- No (0)
- Yes (1)

DEMOGRAPHICS

I just have a few final questions about your background so we can keep track of the characteristics of people who respond to the survey.

D4. At the present are you.....? Please select one response

- Single (never married and not living common-law) (0)
- A member of an unmarried couple (1)
- Married (2)
- Separated, but still legally married (3)
- Divorced, or (4)
- Widowed (5)

D5. How many children under 18 years old live in your household?

_____ number of children

[PROG: NUMERIC TEXT BOX; RANGE 0 – 9; INCLUDE CHECK BOX FOR “PREFER NOT TO ANSWER”; RESPONDENTS MAY ENTER A NUMBER OR SELECT PREFER NOT TO ANSWER, BUT NOT BOTH]

D6. What is the highest degree level of school you have completed? Please select one response

- Never attended school or only attended kindergarten (1)
- Grades 1 through 8 (2)
- Grades 9 through 11 (3)
- Regular high school diploma or GED (4)
- Some college credit, but less than 1 year of college credit (5)
- 1 or more years of college credit, no degree (6)
- Associate degree (7)
- Bachelor's degree (8)
- Master's degree (9)
- Professional degree beyond a bachelor's degree (10)
- Doctorate degree (11)

D7a. Are you currently...? Please select one response

- Employed for wages (1)
- Self-employed (2)
- Out of work for more than 1 year (3)
- Out of work for less than 1 year (4)
- A Homemaker (5)
- A Student (6)
- Retired (7)
- Unable to work (8)

D7b. Have you ever served on active duty in the U.S. Armed Forces, military Reserves, or National Guard? Active duty does not include training for the Reserves or National Guard, but DOES include activation, for example, for the Persian Gulf War. Please select one response

- Yes, now on active duty (1)
- Yes, on active duty in the past, but not during the last 12 months (2)
- No, training for Reserves or National Guard only (3) (go to D8)
- No, never served in the military (4) (go to D8)

[PROG: IF D7b = “NO, TRAINING ONLY” OR “NO, NEVER SERVED”, SKIP TO D8; ELSE, CONTINUE WITH D7c]

D7c. When did you serve on active duty in the U.S. Armed Forces? (Check off each period served, even if just for part of the period). Please select as many periods as apply to you

- September 2001 or later (1)
- August 1990 to August 2001 (including Persian Gulf War) (2)
- September 1980 to July 1990 (3)
- May 1975 to August 1980 (4)
- Vietnam era (August 1964 to April 1975) (5)
- March 1961 to July 1964 (6)
- Korean War (July 1950 to January 1955) (7)
- World War II (December 1941 to December 1946) (8)
- February 1955 to February 1961 (9)
- January 1947 to June 1950 (10)
- November 1941 or earlier (11)

D8. What type of healthcare coverage do you have? Please select one response

- Prepaid private plans such as HMOs (1)
- Medicare (2)
- Medicaid (3)
- Commonwealth Care program (Health Connector) (4)
- Indian Health Services (5)
- Veterans Affairs (VA) (6)
- Other plan _____ (7) [PROG: INCLUDE TEXT BOX WITH "OTHER PLAN"]
- Don't know / Not sure (8888)

D9. Do you own the place where you currently live, pay rent or something else? Please select one response

- Rent (1)
- Own (2)
- Other _____ (3) [PROG: INCLUDE TEXT BOX WITH "OTHER"]

D10. Which of the following best describes your annual household income? Please select one response

- Less than \$15,000 (1)
- \$15,000 to \$29,999 (2)
- \$30,000 to \$49,999 (3)
- \$50,000 to \$69,999 (4)
- \$70,000 to \$99,999 (5)
- \$100,000 to \$124,999 (6)
- \$125,000 - \$149,999 (7)
- \$150,000 or more (8)
- Not sure (8888)
- Prefer not to answer (9999)

D11. What do you estimate your current debt to be? This would include mortgages, credit cards, loans, car payments, etc.? Would you say... Please select one response

- 0 (no debt) (0)
- Less than \$10,000 (1)
- \$10,000 (2)
- \$20,000 (3)
- \$40,000 (4)
- \$60,000 (5)
- \$80,000 (6)
- \$100,000 (7)
- \$120,000 (8)
- \$140,000 (9)
- \$160,000 (10)
- \$180,000 (11)
- \$200,000 (12)
- \$300,000 (13)
- \$400,000 (14)
- \$500,000 (15)
- More than \$500,000 (16)
- Not sure (8888)
- Prefer not to answer (9999)

D12. Were you born in the United States? Please select one response

- No (0)
- Yes (1)

D13. Are you Hispanic or Latino? Please select one response

- Yes (1)
- No (0)
- Prefer not to answer (9999)

D14. Which one or more of the following would you say is your race? Please select all that apply

- White (1)
- Black or African American (2)
- Asian (3)
- Native Hawaiian or Other Pacific Islander (4)
- American Indian (5)
- Alaska Native (6)
- Other _____ (7)

D15. What is the zip code where you live?

_____ [PROG: NUMERIC TEXT BOX; MUST BE A 5-DIGIT NUMBER]

D16. What city or town do you live in?

T1. [PROG: RECORD SURVEY DATE]

T2. [PROG: RECORD SURVEY LENGTH]

END

Those are all the questions I have. I'd like to thank you on behalf of the University of Massachusetts for the time and effort you've spent answering these questions. If you have any questions about this survey, you may contact Dr. Rachel Volberg at 413-545-6700.

If you have any questions concerning your rights as a research subject, you may contact the University of Massachusetts Amherst Human Research Protection Office (HRPO) at (413) 545-3428 or humansubjects@ora.umass.edu. Thank you again.

Message for those who terminate early:

If you have questions about this project or if you have a research-related problem, you may contact Dr. Rachel Volberg at (413) 545-6700. If you have questions concerning your rights as a research subject, you may contact the University of Massachusetts Amherst Human Research Protection Office (HRPO) at (413) 545-3428 or humansubjects@ora.umass.edu.

No Documents

No Documents



Mr. Chairman, Members of the Commission, I am here today with Senior Supervising Gaming Agent Burke Cain. Our task here today is to try and guide you through answering the questions posed by the legal department. Between Mr. Cain and myself we have 72 years of gaming regulatory experience to draw on for our recommendations:

Before promulgating the Commission's table game regulations, the following questions should be considered:

- a. Will the Commission require that all games (including so-called "standard" games) go through an approval process in order to be authorized for play?
We recommend initial rules of the game be reviewed and approved by the Commission. We would further recommend that the Commission review and approve all the most popular games and wagers. This would provide the licensees with a broad menu of games and wagers to offer their customers without having to submit a game for approval during start-up operations. If this process gets accepted we would be recommending 17 different games for approval.
1. If the Commission does require an approval process for all games, what will that approval process be? **We recommend that all games be presented before the Commission for approval, after they have been reviewed by staff. This would be for the initial 17 games. There after we recommend following the new game procedure addressed later in the list of questions. This was the procedure first followed in Pennsylvania, Maryland, Delaware, and New Jersey.**
- b. Will the Commission publish written rules for the "standard" games (*e.g.*, poker, blackjack, craps, roulette)? **We recommend that all games be published on our web page for licensees to follow: This would follow the procedure set in Nevada and Maryland.**
- c. What will be the application process for new table game rules and modified table game rules? Will parties other than licensees be permitted to submit applications?
We recommend that anyone be permitted to submit a new game application as long as the meet the following procedures:
 - 1) **Must have a MA casino to agree to test the game.**
 - 2) **A description of the game and the equipment used in the game.**
 - 3) **A draft of the proposed rules of the game.**



Massachusetts Gaming Commission

- 4) **The true odds, the payout odds, and the house advantage of each wager.**
 - 5) **A mathematical analysis of the game from an approved independent test laboratory.**
 - 6) **A game trial of 45 to 120 days**
- d. What will be the Commission's process for review and approval of new and modified table game rules?

We would recommend an analysis of all the data from the test period, which would include financial data from the game, patron complaint logs maintained by the licensee and the IEB, and general comments from the public. This follows what the majority of gaming jurisdictions follow.

- e. Will the Commission publish table game rules in its regulations, on its website, or in some other way? **We would recommend that we publish the rules of the game on our website, to be followed by our licensees. We would recommend that we publish a gaming regulation directing all licensees to follow the rules of the games posted on our website. This would allow us to change any game in a quick and responsible manner without going through the regulatory approval process.**

In answering this question, consider why it's important to make the rules available to the public and whether the rules are a subject that would benefit from the public comment period of the regulation promulgation process or are appropriately addressed outside of the regulation promulgation process. **We recommend that the Commission require the licensee to provide a copy of the rules of the games on the casino floor area. We may want to possibly have them available at the "Game Sense", as a way to make the public aware of their program. We would also recommend that the Rules of the Games be available to the public on our website, maybe under the heading of Burke's catch phrase jingle..."Know the rules, know the game".**

If the Commission determines that the rules will not be published in the regulations, an option remains to include a review and comment period for licensees in the administrative table game regulations. **We recommend having a review and comment period for licensees in the administrative table game regulations**



Massachusetts Gaming Commission

- f. Will the Commission permit reciprocity for game rules that have been approved in other jurisdictions? If so, will those game rules then be completely exempt from an approval process or will they be subject to a modified approval process?
We recommend MGC review of any game, as each jurisdiction approaches this differently.
- g. As the regulations are drafted, how would the Commission like to conduct its review (e.g., groupings of particular games or all at once)?

We would recommend that all the regulations be submitted to you in one package. We understand that this would be a large package for you to review, but it also gives the licensees an opportunity to see what games we will allow them to offer at the start, as well as allowing them to start preparing their gaming equipment orders.



Massachusetts Gaming Commission

Bruce Band
Assistant Director
Investigations and Enforcement Bureau
Massachusetts Gaming Commission
101 Federal Street, 12th Floor
Boston, MA 02110

Re: Table Game Regulations

Dear Mr. Band:

In response to the Massachusetts Gaming Commission's (Commission) request for comments on questions posed at its meeting on January 5, 2017, with respect to the Commission's promulgation of regulations governing table game rules, please accept the following comments on behalf of Blue Tarp reDevelopment, LLC ("MGM Springfield") and Wynn MA, LLC ("Wynn MA," and collectively with MGM Springfield, the "Category 1 Licensees"). The Category 1 Licensees appreciate the opportunity to engage in this collaborative approach with the Commission by providing their input on these preliminary questions as you contemplate the approval and oversight of table games at Category 1 gaming establishments in the Commonwealth.

The Category 1 Licensees collectively operate thousands of table games in multiple jurisdictions throughout the United States, including many of the Standard Games as well as Standard Options and Variations of these games, being considered by the Commission for initial review and approval (capitalized terms defined below). It has been MGM's and Wynn MA's experience that jurisdictions with regulatory structures that promote flexibility and innovation, while protecting the integrity of the games, provide the best customer experience as well as greatest potential to generate tax revenue. The Category 1 Licensees commends members of the Commission and Staff for its thoughtful approach to the regulation of table games with these factors in mind, as expressed at the January 5, 2017 Public Meeting.

Set forth below are answers and comments on the questions presented by the Commission at the January 5, 2017 Public Meeting. As a preliminary matter, it is our suggestion that the Commission should consider defining the categories of table games recognized in most US jurisdictions, such as "Standard Games", "Standard Options" and "Variations". These definitions, recommendations for which are set forth below, could help guide the Commission in establishing the appropriate regulatory review and approval processes for their use in Massachusetts.

Standard Games: Longstanding casino table games that have well-established rules developed in existing gaming jurisdictions generally understood by table game customers (e.g., Blackjack or 21, Craps, Roulette, Baccarat, Mini-Baccarat, etc.; see attached schedule with a complete listing of Standard Games).

Standard Options: Longstanding alternatives to the rules of Standard Games that are well established in existing gaming jurisdictions and that are generally understood by table games customers (e.g., 0 or 00 in Roulette, whether dealer is required to hit or stand on soft 17 in Blackjack, 3X,4X,5X odds or 5X odds at Craps, etc.; see attached schedule with a complete listing of Standard Options).

Variations: Table games, other than the Standard Games, that have been introduced, tested and approved in other gaming jurisdictions and offered to customers in licensed casinos over a prolonged period of time such that they have been established as generally accepted. Variations are usually developed and owned by third parties and licensed to casinos for a fee (e.g., 3 card Poker, Let It Ride, Easy Baccarat, Three Card Poker, etc.; see attached schedule with a complete listing of Variations).

Based on these definitions, the Commission should distinguish in its review and approval processes between Standard Games, Standard Options, and Variations and *new* Standard Options and *new* Variations. We suggest that the former would be approved as a matter of course with the latter requiring a process for review and approval. We also suggest that all approval processes and the publication of all table game rules should be outside of the formal regulatory process in order to promote efficiency and flexibility

- a. Will the Commission require that all games (including so-called "standard" games) go through an approval process in order to be authorized for play, or will it authorize particular games for play by some other method (e.g., authorization by regulation)? If the Commission does require an approval process for all games, what will that approval process be?*

We believe that the Commission should initially authorize a catalog of Standard Games, Standard Options and Variations for use in Category 1 gaming establishments in Massachusetts. We suggest that the Commission's initial review should be proportional within the context that these are longstanding games with well-established rules. A proposed list of Standard Games, Standard Options and Variations for initial approval is attached hereto. Once the Commission establishes an approved catalog of Standard Games, Standard Options and Variations, the Category 1 licensees can then opt into each table game it wishes to offer its Massachusetts customers. A licensee can opt in by filing a list of table games being offered at the gaming establishment as part of the licensee's internal controls, perhaps via a checklist system. The licensee will have an obligation to periodically update its table game submission or when it intends to add or discontinue offering a Standard Game, Standard Option and Variation from the approved catalog.

- b. *Will the Commission publish written rules for the “standard” games (e.g., poker, blackjack, craps, roulette)?*

As staff recommended, the Commission should publish written rules for Standard Games as well as Standard Options and Variations. Publication of each game’s rules provides transparency and information for consumers.

- c. *What will be the application process for new table game rules and modified table game rules? Will parties other than licensees be permitted to submit applications?*

Distinguished from the approval process set forth above for an initial catalog of Standard Games, Standard Options and Variations, *new* Standard Options and *new* Variations would be subject to an application process. First, only licensees or an applicant sponsored by a licensee, may submit a game for approval to the Commission. As recommended by the Commission staff, applications for a new Standard Options and new Variations should include a description of the game, its rules and sample equipment used for the game including prototypes. The submission may include the true odds, the payout odds and the house advantage. In addition, the submission may include an analysis of the game from an approved independent test laboratory and any field test data for the game.¹ The Commission may also request a reasonable trial period for the game on a licensee’s gaming floor.

- d. *What will be the Commission’s process for review and approval of new and modified table game rules?*

Through their testimony at the January 5, 2017 hearing, Commission staff offered several appropriate steps to review application materials and compare the submission with the game’s performance during the test period including: (i) collecting additional appropriate financial data pertaining to the game’s performance; (ii) reviewing complaints; and (iii) collecting other feedback from patrons, gaming agents and gaming establishment employees.

We suggest that the MGC staff’s findings and analysis should be made available to the sponsoring licensee and, where no material issues are detected, the game should be submitted to the Commission for approval and added to the Commission’s authorized table game catalog for use by any category 1 licensee that opts into the game.

- e. *Will the Commission publish table game rules in its regulations, on its website, or in some other way? In answering this question, consider why it’s important to make the rules available to the public and whether the rules are a subject that would benefit from the public comment period of the regulation promulgation process or are appropriately addressed outside of the regulation promulgation process. If the Commission determines that the rules will not be published in the regulations, an option remains to include a review and comment period for licensees in the administrative table game regulations.*

¹ The Commission should have a process in place to ensure the confidentiality of any proprietary or commercially sensitive information contained in an application.

The Commission has wide discretion in determining the manner in which table games will be approved and how a table game's rules will be published. However, we implore the Commission to give significant consideration to publishing its rules on its website and not as part of its formal regulations. While the formal regulatory process serves a purpose we do not believe that it is the best approach for approving and publishing table game rules. The formal regulatory process requires significant resources to initially approve regulations and, more importantly, to amend existing regulations to account for a change or adding a new game. Indeed, the Maryland Lottery and Gaming Control Agency (MLGCA) recently amended its table game regulations removing specific game rules from its regulations. Under revised MLGCA process, future table game rules changes and the approval of new games does not go through the regulatory process while the MLGCA retains its discretion to approve such changes. Massachusetts should follow the MLGCA's approach.²

While the rules of each table game should be published on the Commission website, a comment period on changes to rules or new rules for new Standard Options or Variations is unnecessary. The process for a change or approval of new Standard Options or Variations should be bilateral between the sponsoring licensee and Commission staff. Commission staff has the expertise to evaluate whether a change or a new offering meets the standards for table games to ensure the integrity of the game and the protection of the public interest. Allowing public comment on table games or table game rules is akin to allowing the public to opine on whether the Commission should allow a new electronic game on the casino floor or whether a casino's internal controls for surveillance are adequate. These are inherent regulatory functions that the Legislature has bestowed on the Gaming Commission to carry out on behalf of the public.

At the January 5, 2017 Public Meeting, Chairman Crosby and others pointed out the necessity to have flexibility in the table game change and approval process to ensure that Massachusetts licensees stay competitive in the New England market – a position shared by the Category 1 Licensees. An approval process outside of the formal regulatory process provides this desired level of flexibility while ensuring that the Commission retains discretion to approve any new Standard Options or Variations.

f. Will the Commission permit reciprocity for game rules that have been approved in other jurisdictions? If so, will those game rules then be completely exempt from an approval process or will they be subject to a modified approval process?

Without sacrificing its discretion to approve table games, the Commission can use reciprocity to streamline its approval process for new Standard Options or Variations. For example, the

² This is not to say that the Commission will have no formal table game regulation. Like Maryland, we believe that the Commission should promulgate a short table game regulation as part of the CMR that has the following components: (i) that all table games or changes to table games must be approved by the Commission; (ii) a requirement for the Commission to maintain a list or catalog of all approved Standard Games, Standard Options and Variations; (iii) a requirement that all table games rules are posted on at least the Commission's website; and (iv) that licensees must file and keep current a list of all Standard Games, Standard Options and Variations offered at the gaming establishment as part of its internal controls under 205 CMR 138.00.

Commission could accept independent lab testing results that have been accepted by another jurisdiction or accept field testing from another jurisdiction. By accepting materials and analysis from other jurisdictions for their own review, the Commission could greatly reduce the burden and expense of seeking such approvals. It would also allow Commission and Commission staff to focus upon issues that it decides are more important to focus upon. This in turn will incent licensees to bring new and diverse offerings to Massachusetts that have been successfully and safely introduced in other jurisdictions.

g. As the regulations are drafted, how would the Commission like to conduct its review (e.g., groupings of particular games or all at once)?

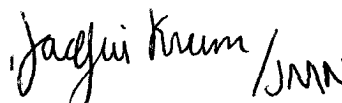
Please see Answer “a” and “e” above.

Thank you for the opportunity to offer responses and comments on these issues.

Sincerely,



Seth N. Stratton
Vice President and Legal Counsel
MGM Springfield



Jacquie Krum
Senior Vice President & General Counsel
Wynn MA

Proposed Schedule of Massachusetts Standard Games, Standard Options and Variations³

Standard Game	Standard Option	Variation (and Options)
Craps	<ul style="list-style-type: none"> • Automated Craps • Mini-Dice • Fire Bet • Small, Tall and All • Hot Roller • Repeater Bets • Match Play • Golden Dice Challenge Bonus • Bonus Craps • Single • Double • Triple • 3-4-5 Method • Quadruple • Quintuple • 6X • 7X • 8X • 9X • 10X • 11X to 100X 	
Blackjack	<ul style="list-style-type: none"> • Blazing 7 • Buster Blackjack • King's Bounty Blackjack • Lucky Ladies 	<ul style="list-style-type: none"> • Double Exposure • Bet'em All Blackjack • Blackjack Switch <p><i>Options:</i></p> <ul style="list-style-type: none"> ○ Match Wager

³ The Category 1 Licensees reserve their rights to change or supplement the schedule as the table game rules and policies move through the promulgation process.

	<ul style="list-style-type: none"> • 21+3 • 21+3 Extreme • Match The Dealer • Blackjack Bonus • Royal Match • Streak Wager • Number of Decks • Match Play Coupon • Free Play • 6 to 5 blackjack • 3 to 2 blackjack • Surrender • In Bet • Split pairs 1x 2x 3x • Hit soft 17 • Stand soft 17 • Progressive Wager • Super 4 Progressive Blackjack • Lucky Lucky • Bonus Spin 	<ul style="list-style-type: none"> ○ 1x Split • Freebet Blackjack • Switch Hands Blackjack • Spanish 21 <i>Options:</i> <ul style="list-style-type: none"> ○ Match the Dealer • Double Attack Blackjack • Triple Attack Blackjack
Baccarat	<ul style="list-style-type: none"> • Tie • Dragon Bonus • Lucky 6 • 4-5-6 wager • Free Play • Streak Wager • Dragon 7 Wager • Panda 8 wager • Pairs wager 	<ul style="list-style-type: none"> • Mini/Midi Baccarat • Baccarat-Punto Banco • Baccarat-Chemin De Fer • EZ Baccarat
Roulette	<ul style="list-style-type: none"> • Single "0" 	

	<ul style="list-style-type: none"> • Double “00” • Match Play Coupon • Free play • u-spin • Diamond Roulette 	
Pai Gow		<ul style="list-style-type: none"> • Supreme Pai Gow • Fortune Pai Gow Poker Progressive • Pai Gow (Tiles) • Emperor’s Challenge
EZ Pai Gow	<ul style="list-style-type: none"> • Fortune Progressive Pai Gow Poker • Queen’s Dragon Bet • Protection • Fortune Bonus • Dynasty Bonus 	
Casino War		
Big Six Wheels		
Sic Bo		
Poker (Casino)		<ul style="list-style-type: none"> • Caribbean Stud Poker <i>Option:</i> <ul style="list-style-type: none"> ○ Progressive Bonus • Let It Ride Poker <i>Option:</i> <ul style="list-style-type: none"> ○ 3 Card Bonus ○ 6 Card Bonus • Let It Ride Poker <i>Option:</i> <ul style="list-style-type: none"> ○ LIR Bonus • Three-Card Poker <i>Option:</i>

		<ul style="list-style-type: none"> ○ Pair Plus ○ 6 Card Bonus ● Four-Card Poker <i>Option:</i> <ul style="list-style-type: none"> ○ Aces Up ● Texas Hold 'Em Bonus Poker <i>Option:</i> <ul style="list-style-type: none"> ○ Bonus Wager ● Flop Poker <i>Option:</i> <ul style="list-style-type: none"> ○ 3 Card Bonus ● Ultimate Texas Hold 'Em ● Boston 5 Stud Poker ● Criss Cross Poker <i>Option:</i> <ul style="list-style-type: none"> ○ 5 Card Bonus ○ Bonus Spin ● Mississippi Stud ● Colorado Hold 'Em Poker ● Double Down Stud ● Heads-Up Hold'em ● Crazy 4 Poker <i>Option:</i> <ul style="list-style-type: none"> ○ Queens Up ● Flushes Gone Wild ● Fast Action Hold 'Em ● Double Cross Poker ● Two-Card Joker Poker ● Winner's Pot Poker ● Mini-Tex 3 Card Hold 'Em ● High Card Flush ● Chase the Flush
Poker		

(Traditional)		
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Category	Section	Quote From Standards	Scientific Games Feedback
		General Comment	SG has had extensive experience in obtaining approval for table games in multiple jurisdictions using a variety of methods and processes. If it benefits the Commission, we can be available for a more detailed discussion regarding best practices to ensure game integrity, process efficiency, and sustainable controls for table game products.
Table Games		1. Will the Commission require that all games (including so-called "standard" games) go through an approval process in order to be authorized for play, or will it authorize particular games for play by some other method (e.g., authorization by regulation)? If the Commission does require an approval process for all games, what will that approval process be?	<p>SG recommends that standard games as identified in question 2 be authorized by regulation and not required to go through an approval process. Standard games are globally recognized and basically have the same set of rules and are, therefore, played in a similar manner. Requiring approval for these games would be redundant and time consuming.</p> <p>SG further recommends that variations of the standard games be subject to Commission approval.</p>
Table Games		2. Will the Commission publish written rules for the "standard" games (g., poker, blackjack, craps, roulette)?	SG recommends that the Commission work with the industry to identify appropriate existing "standard" game rules which can be authorized by regulation and not required to go through an approval process (Ex. Hoyle's rules for Poker as a standard baseline). This will allow the Commission flexibility in how they choose to present these rules to the public (i.e. publish the rules directly or reference other standardized sources for accessing these rules).
Table Games		3. What will be the application process for new table game rules and modified table game rules? Will parties other than licensees be permitted to submit applications?	<p>SG recommends that the Commission only accept applications for new or modified table game rules from licensed entities. This will ensure the integrity of product offerings, and minimize the extent of analysis required to receive approval.</p> <p>Applications received from licensed entities may be processed with reasonable confidence in a more efficient manner akin to other gaming products. For example the Commission may by regulation establish authority to approve new and modified game rules. Given that authority, new and modified game rules could then be approved via a Commission defined process similar to slot</p>

<u>Category</u>	<u>Section</u>	<u>Quote From Standards</u>	<u>Scientific Games Feedback</u>
			machine games or other gaming components without requiring regulatory reform.
Table Games		4. What will be the Commission's process for review and approval of new and modified table game rules?	<p>As mentioned above, the Commission may find it preferable to establish authority to approve new and modified game rules. This could allow the Commission better flexibility to define a process that fits regulatory and industry needs.</p> <p>SG recommends that the Commission not require publication of new and modified table game rules in the regulations. While this practice is used in other jurisdictions, it has proven to be unnecessarily costly and time consuming for all parties involved. Rather, we suggest that the Commission provide a repository for all approved table game rules and rule variations (i.e. list of approved table game rules) that is accessible to the public via the Commission's website or similar resource.</p>
Table Games		5. Will the Commission publish table game rules in its regulations, on its website, or in some other way?	As suggested above, the Commission may find it is more efficient, effective, and adaptable to provide a repository for all approved table game rules and rule variations that is accessible to the public via the Commission's website or similar resource.
Table Games		6. Will the Commission permit reciprocity for game rules that have been approved in other jurisdictions? If so, will those game rules then be completely exempt from an approval process or will they be subject to a modified approval process?	<p>To ensure that MA has an efficient approval process and receives the most current games, it is recommended that MA allow reciprocity for approved game rules without secondary approval from the state. A simple addition of these game rules to the repository mentioned previously could serve as Commission acknowledgment of reciprocal approval.</p> <p>Many jurisdictions that allow table games already have extensive approval processes in place. It would be beneficial to MA to acknowledge these approvals, thus reducing Commission effort and allowing new games into the State in an expedited manner.</p>

205 CMR: MASSACHUSETTS GAMING COMMISSION

205 CMR 152.00: INDIVIDUALS EXCLUDED FROM A GAMING ESTABLISHMENT

Section

152.01: Scope and Authority

152.02: Maintenance and Distribution of List

152.03: Criteria for Exclusion

152.04: Investigation and Initial Placement of Names on the List

152.05: Notice and Proceedings Before the Commission

~~152.06: Information Contained on List~~

~~152.07~~152.06: Duty of Gaming Licensee

~~152.08~~152.07: Petition to Remove Name From Exclusion List

~~152.09~~152.08: Forfeiture of Winnings

152.01: Scope and Authority

The provisions of 205 CMR 152.00 shall provide for the establishment and maintenance of a list, and associated protocols and procedures, for exclusion of individuals from gaming establishments in accordance with M.G.L. c. 23K, §§ 45(a) through (e) and 45(j). Such list shall be maintained separately from that established and maintained in accordance with M.G.L. c. 23K, § 45(f) through (h).

152.02: Maintenance and Distribution of List

(1) The Commission shall maintain a list of persons to be excluded or ejected from a gaming establishment ~~which~~ **and whose names and year of birth** shall be posted on the commission's website (<http://massgaming.com/>).

~~(2) Each gaming licensee shall ensure that it accesses and reviews the list on a regular basis and that it is made available to all employees of the gaming establishment.~~

(2) The Bureau shall promptly notify each gaming licensee of the placement of an individual on the list. The notification to each gaming licensee shall include:

- a. The full name and all aliases the individual is believed to have used;**
- b. A description of the individual's physical appearance, including height, weight, type of build, color of hair and eyes, and any other physical characteristics which may assist in the identification of the individual;**
- c. The individual's date of birth;**
- d. The effective date of the order mandating the exclusion of the individual;**
- e. A photograph, if obtainable, and the date thereof; and**
- f. Such other information deemed necessary by the commission for the enforcement of 205 CMR 152.00.**

152.03: Criteria for Exclusion

(1) In the commission's discretion, an individual may be placed on the exclusion list if the commission determines that the individual meets one or more of the following criteria:

- (a) the individual has been convicted of a criminal offense under the laws of any state or the United States that is punishable by more than six months in a state prison, a house of correction or any comparable incarceration, a crime of moral turpitude or a violation of the gaming laws of any state;
- (b) the individual has violated or conspired to violate M.G.L. c. 23K or any laws related to gaming;
- (c) the individual has a notorious or unsavory reputation which would adversely affect public confidence and trust that the gaming industry is free from criminal or corruptive elements;
- (d) the individual is an associate of an individual who falls into a category identified in 205 CMR 152.03(1)(a) through (c);
- (e) there exists the potential of injurious threat to the interests of the commonwealth if the individual is permitted in a gaming establishment.

(2) In determining whether there exists the potential of injurious threat to the interests of the commonwealth if an individual is permitted in a gaming establishment in accordance with 205 CMR 152.03(1)(e), the commission may consider the following:

- (a) Whether the individual is a known cheat;
- (b) Whether the individual has had a license or registration issued in accordance with 205 CMR 134.00: Licensing and Registration of Employees, Vendors, Junket Enterprises and Representatives, and Labor Organizations, or a like license or registration issued by another jurisdiction, suspended or revoked or has been otherwise subjected to adverse action;
- (c) Whether the individual poses a threat to the safety of the patrons or employees of a gaming establishment;
- (d) Whether the individual has a documented history of conduct involving the undue disruption of gaming operations in any jurisdiction;
- (e) Whether the individual is subject to a no trespass order at any casino or gaming establishment in any jurisdiction.

(3) The commission shall not base a finding to place an individual on the excluded list on an individual's race, color, religion, religious creed, national origin, ancestry, sexual orientation, gender identity or expression, age (other than minimum age requirements), marital status, veteran status, genetic information, disability or sex.

152.04: Investigation and Initial Placement of Names on the List

(1) The IEB shall investigate any individual who may meet one or more criterion for inclusion on the list in accordance with 205 CMR 152.03 upon referral by the commission, [the Gaming Enforcement Division of the Office of the Attorney General](#), or a gaming licensee. The IEB may investigate any individual on its own initiative.

(2) If, upon completion of an investigation, the IEB determines that an individual meets one or more criterion contained in 205 CMR 152.03 and should be placed on the exclusion list, the IEB shall prepare a preliminary order that identifies the individual and sets forth a factual basis as to why the IEB believes the individual meets one or more criterion for inclusion on the list in accordance with 205 CMR 152.03.

(3) The IEB shall serve the preliminary order prepared in accordance with 205 CMR 152.04(2) upon the named individual advising them that it intends to place the individual's name on the exclusion list. The preliminary order shall serve to notify the individual that placement of their name on the exclusion list will result in their prohibition from being present in a gaming establishment and shall offer them an opportunity to request a hearing before a hearing officer to determine whether the individual meets one or more criterion for inclusion on the list in accordance with 205 CMR 152.03. The preliminary order shall be sent by either first class mail to the individual's last ascertainable address, email, publication in a daily newspaper of general circulation for one week, or via any practicable means reasonably calculated to provide the individual with actual notice. The individual shall have 30 days from the date of the notice to request a hearing, except for notice provided by publication in a newspaper in which case the individual shall have 60 days from the last publication. Alternatively, the IEB may provide an individual with in hand service of the preliminary order in which case the individual shall have ten days from the date of service to request a hearing.

(4) If a request for a hearing is received from the individual, a hearing shall be scheduled before a hearing officer and notice of such, including the date, time, and issue to be presented, shall be sent to the individual. The hearing shall be conducted in accordance with 205 CMR 101.03: Review of Orders Issued by the Bureau or the Racing Division. If the hearing officer finds that the individual meets one or more criterion for inclusion on the list in accordance with 205 CMR 152.03 the individual's name shall be placed on the exclusion list. If the hearing officer finds that the individual does not meet any criterion for inclusion on the list, the individual's name shall not be placed on the list and the matter closed.

(5) If no request for a hearing is received within the applicable timeline provided in 205 CMR 152.04(3), the individual's name shall be placed on the exclusion list.

152.05: Notice and Proceedings Before the Commission

(1) Whenever an individual's name is placed on the list of excluded persons in accordance with 205 CMR 152.04, the IEB shall promptly serve written notice upon that individual by personal service, registered or certified mail return receipt requested to the last ascertainable address or by publication in a daily newspaper of general circulation for one week. The notice shall contain a description of the cause for the exclusion, notice that the individual is prohibited from being present at and gambling in a gaming establishment, and an explanation of the hearing process and manner in which the individual may request a hearing in accordance with 205 CMR 152.05(2).

- (2) (a) Within 30 days of receipt of service of notice by mail or 60 days after the last publication under 205 CMR 152.05(1), an individual placed on the list of excluded persons may request an adjudicatory hearing before the commission under M.G.L. c. 30A and show cause as to why the individual should be removed from the list of excluded persons. Such request shall be made by the individual in writing. Failure to demand a hearing within the time allotted in 205 CMR 152.05(2)(a) shall preclude the individual from having an administrative hearing, but shall not affect the individual's right to petition for judicial review.
- (b) Upon receipt of a demand for hearing, the commission shall set a time and place for the hearing. This hearing shall be held not later than 30 days after receipt of the demand for the hearing, unless the time of the hearing is changed by agreement of the commission and the individual demanding the hearing. The hearing shall be conducted in accordance with 205 CMR 101.00: M.G.L. c. 23K Adjudicatory Proceedings. Where applicable, the administrative record of the hearing conducted in accordance with 205 CMR 152.04(4) shall be made part of the hearing record.
- (c) If upon completion of the hearing the commission determines that the individual was wrongfully placed on the list of excluded persons, the commission shall remove the individual's name from the list of excluded persons and notify all gaming licensees.
- (d) A person aggrieved by a final decision of the commission in an adjudicatory proceeding under 205 CMR 152.05 may petition for judicial review under M.G.L. c. 30A, § 14.
- (3) Upon receipt of notice from a district court that an individual has been prohibited from gaming in gaming establishments in accordance with M.G.L. c. 23K, § 45(i) the commission shall place the name of an individual on the excluded list.

152.06: Information Contained on List

The following information and data, where available, shall be provided for each excluded individual:

- ~~(1) The full name and all aliases the individual is believed to have used;~~
- ~~(2) A description of the individual's physical appearance, including height, weight, type of build, color of hair and eyes and any other physical characteristics which may assist in the identification of the individual;~~
- ~~(3) The individual's date of birth;~~
- ~~(4) The effective date of the order mandating the exclusion of the individual;~~
- ~~(5) A photograph, if obtainable, and the date thereof; and~~
- ~~(6) Such other information deemed necessary by the commission for the enforcement of 205 CMR 152.00.~~

~~152.07~~ 152.06: Duty of Gaming Licensee

- (1) Each gaming licensee shall ensure that it accesses and reviews the list on a regular basis and that the list is made available to employees of the gaming establishment licensee in a manner designed to assist them in identifying and inhibiting excluded individuals from entering the gaming establishment.
 - (2) Upon identification, a gaming licensee shall exclude or eject from its gaming establishment any individual who has been placed on the list in accordance with 205 CMR 152.00.
 - (3) If an excluded individual enters, attempts to enter, or is in a gaming establishment and is recognized by the gaming licensee, the gaming licensee shall immediately notify the IEB in advance of ejecting the individual.
 - (4) It shall be the continuing duty of a gaming licensee to inform the commission in writing of the names of individuals it believes are appropriate for placement on the exclusion list.
 - (5) A gaming licensee shall submit a written policy for compliance with the exclusion list program for approval by the executive director. The executive director shall review the plan for compliance with 205 CMR 152.00. If approved, notice shall be provided to the commission and the plan shall be implemented and followed by the gaming licensee. The plan for compliance with the exclusion list program shall include at a minimum procedures to:
 - (a) Prevent an individual on the exclusion list from entering the gaming establishment;
 - (b) Identify and eject individuals on the list from the gaming establishment if they are able to enter;
 - (c) Remove individuals on the exclusion list from marketing lists and refrain from sending or transmitting to them any advertisement, promotion, or other direct marketing mailing from the gaming establishment more than 30 days after receiving notice from commission that the individual has been placed on the exclusion list;
 - (d) Prevent an individual on the exclusion list from having access to credit, cashless wagering program access, or from receiving complimentary services, check-cashing services, junket participation and other benefits from the gaming establishment;
 - (e) Train employees relative to the exclusion list and the licensee's program.
- (5) The commission may revoke, limit, condition, suspend or fine a gaming licensee if it knowingly or recklessly fails to exclude or eject from its gaming establishment any individual placed by the commission on the list of excluded persons.

~~152.08~~ **152.07**: Petition to Remove Name from Exclusion List

- (1) An individual who has been placed on the list in accordance with 205 CMR 152.00 may petition the commission in writing to request that their name be removed from the list. Except in extraordinary circumstances, such a petition may not be filed sooner than five years from the date an individual's name is initially placed on the list.
- (2) The individual shall state with particularity in the petition the reason why the individual believes they no longer satisfy one or more criterion for inclusion on the list in accordance with 205 CMR 152.03.
- (3) The commission shall schedule a hearing on any properly filed petitions and provide written notice to the petitioner identifying the time and place of the hearing. Such a hearing shall be conducted in accordance with 205 CMR 101.00: M.G.L. c. 23K Adjudicatory Proceedings.
- (4) An individual who was placed on the excluded list by virtue of an order of the district court in accordance with M.G.L. c. 23K, § 45(i) may not petition for removal in accordance with 205 CMR 152.08.

~~152.09~~ **152.08**: Forfeiture of Winnings

- (1) An individual who is on the excluded list shall not collect any winnings or recover losses arising as a result of prohibited gaming in a gaming establishment and such winnings shall be forfeited to the commission and deposited into the Gaming Revenue Fund pursuant to M.G.L. c. 23K, §§ 45(j) and 59.
- (2) Upon verification that an individual who is present in its gaming establishment is on the excluded list, a gaming licensee shall take steps to:
 - (a) Remove the individual from the gaming establishment;
 - (b) Where **reasonably possible, lawfully confiscate from the individual in a lawful manner or notify the Bureau who shall lawfully confiscate, or refuse to pay** ~~cause the individual to forfeit~~ any winnings or things of value obtained from engaging in a gaming transaction including:
 1. gaming chips, gaming plaques, slot machine tokens and vouchers, and gaming vouchers;
 2. any electronic gaming device or slot machine jackpot won by the individual;
 3. any cashable credits remaining on an electronic gaming device or slot machine credit meter played by the individual.
 - (c) Deliver any winnings or things of value obtained from the individual to the cashiers' cage, ~~where they shall be converted into cash,~~ and **transmit** the cash value ~~transmitted~~ to the commission for deposit in the Gaming Revenue Fund.
 - (d) In conjunction with a forfeiture of winnings or things of value, a gaming licensee shall prepare a form known as a Notice of Forfeiture, which shall include, without limitation, the name of the individual on the list and the manner in which the

individual's identity was established, the total value of the forfeited winnings or things of value, the date, time, and a description of the incident leading to the forfeiture. The Notice of Forfeiture shall be signed and attested to by the prohibited individual, unless the individual refuses to sign or is unknown, the employee delivering the winnings or things of value to the cashiers' cage, and the cashiers' cage employee who received the winnings or things of value.

(3) If an individual wishes to contest the forfeiture of winnings or things of value, the individual may request a hearing in writing with the commission within 15 days of the date of the forfeiture. The request shall identify the reason why the winnings or things of value should not be forfeited. The commission shall schedule a hearing on such request and provide notice to the petitioner.

REGULATORY AUTHORITY

205 CMR 152.00: M.G.L. c. 23K, §§ 4(28), 4(37), and 45.



January 27, 2017

MGC Comments
Massachusetts Gaming Commission
101 Federal Street, 12th Floor
Boston, MA 02110

Re: Excluded Individuals Regulations Comment

Dear Sir/Madam:

In response to the Massachusetts Gaming Commission's (Commission) request for comments on proposed changes to 205 CMR 152, *Individuals Excluded from a Gaming Establishment*, please accept the following comments on behalf of Blue Tarp reDevelopment, LLC ("MGM Springfield"). MGM Springfield appreciates the opportunity to provide feedback on the proposed changes and other aspects of the Regulation prior to commencing the formal regulation promulgation process.

Set forth below are comments and suggested changes to specific sections of 205 CMR 152.00.

205 CMR 152.06(1)

This section should be revised to reference "employees of the gaming licensee" as opposed to "employees of the gaming establishment".

205 CMR 152.06(2) and (3)

These sections create an affirmative obligation to exclude or eject an excluded person from the gaming establishment and immediately notify the IEB. These sections should clarify whether the IEB notification is required to occur prior to, or after, the removal of the excluded person.

205 CMR 152.06(4)

This section establishes a continuing duty of a gaming licensee to inform the Commission of individuals that "it believes are appropriate" for placement on the exclusion list. This section's

subjective standard may be difficult for licensees to comply with and for the Commission to enforce. Moreover, under G.L. c. 23K, § 45, the Commission has sole discretion to establish the exclusion list. Accordingly, this section should be revised to require the gaming licensees to report to the IEB when they have actual knowledge that a person who is reasonably likely to satisfy the Criteria for Exclusion established in 205 CMR 152.03 and G.L. c. 23K, § 45(a) has been present at the gaming establishment so that the IEB can investigate and the Commission can determine whether such a person should be added to the exclusion list.

205 CMR 152.08(2)(b)

This section requires the licensee to cause an individual on the exclusion list to forfeit any winnings. This section should be clarified that such forfeitures are required by statute as follows: “Where legally permissible and reasonably possible without risk of harm to persons or damage to property, cause an excluded individual to forfeit any winnings or things of value obtained from engaging in a gaming transaction as required by G.L. c. 23K § 45(j)”.

205 CMR 152.08(2)(c)

This section requires all unlawful winnings by an excluded person be converted to cash by the licensee and transferred to the Commission’s Gaming Revenue Fund. The Commission should clarify that the forfeited cash amount can be transferred to the Commission’s Gaming Revenue Fund via electronic funds transfer or an equivalent process.

In addition to the suggested changes above, MGM Springfield recommends that the Commission add a provision to the Regulation in section 152.04 (Duties of the IEB) that requires the IEB to review and update information pertaining to individuals on the exclusion list no less than every 5 years and thereafter transmit any updated identifying information in section 152.02(2) to the licensees including an updated photograph if obtainable. As exclusions under G.L. c. 23K, § 45 and 205 CMR 152.00 are lifetime unless removed through the petition process, updated information pertaining to individuals on the exclusion list is essential for compliance with this regulation.

Thank you for your attention to this matter. MGM Springfield looks forward to working with the Commission on the revisions to the Excluded Person Regulation.

Sincerely,



Seth N. Stratton

Vice President and Legal Counsel

From: Lisa McKenney [<mailto:Lisa.McKenney@pngaming.com>]
Sent: Friday, January 27, 2017 10:14 AM
To: MGCcomments (MGC)
Subject: Excluded Individuals Regulations Comment
Importance: High

Good Morning,

Please see PPC's comments in relation to the proposed revisions to Regulation CMR152.00 – Excluded Individuals below:

152.03: Criteria for exclusion

(1) In the commission's discretion, an individual may be placed on the exclusion list if the commission determines that the individual meets one or more of the following criteria:

a. the individual has been convicted of a criminal offense under the laws of any state or the United States that is punishable by more than 6 months in a state prison, a house of correction or any comparable incarceration, a crime of moral turpitude or a violation ...

d. the individual is an associate of an individual who falls into a category identified in 205 **CMR** **152.03(1)(a) through (c)**;

Comment: Should this read CMR 152.03(1)(a) through (c)?

152.06: Duty of Gaming Licensee

1) Each gaming licensee shall ensure that it accesses and reviews the list, and that the list is made available to employees of the gaming establishment in a manner designed to assist them in identifying and inhibiting excluded individuals from entering the gaming establishment...

Comment: Will the MGC be responsible for distributing the Licensee with the Exclusion List on a predetermined basis (e.g., upon additions and removals)? We understand that additions/removals to the Exclusion List may not be as frequent as the current VSE List, however, PPC would like to know timing and distribution method(s)?

Please contact me if you would like additional information,
Thank You,

Lisa McKenney

Compliance Manager

301 Washington Street

Plainville, Massachusetts 02762

Office: 508-576-4409

Cell: 860-235-3009

Lisa.McKenney@PNGaming.com





Legal Division

TO: Massachusetts Gaming Commission

FROM: Carrie Torrisi, Staff Attorney

DATE: January 31, 2017

RE: Table Game Equipment

Before Category 1 licensees begin operating casinos in the Commonwealth, the Commission must promulgate regulations governing the equipment used in various types of table game play. Requiring that uniform equipment is used among licensed casinos within the Commonwealth will help to ensure fair and equitable play at all table games no matter the location. Below is a survey of table game equipment regulations in Nevada, New Jersey, Pennsylvania, Ohio, and Maryland.

I. Chips and Plaques

A. Chips

A survey of the table game equipment regulations in Nevada, New Jersey, Pennsylvania, Ohio, and Maryland reveals that all five jurisdictions distinguish in some way among the various types of chips that may be used in a casino. All states surveyed regulate certain specifications for “value chips,” which are chips of a particular denomination. In particular, all states surveyed regulate the colors and denominations that may be used for value chips, and all but Nevada regulate the exact size of the value chips. Only Ohio states explicitly that the chips must be round. In addition, all five jurisdictions require that the value chips display the name or logo of the licensee as well as the city or state where the casino is located, while only Nevada and Ohio require that the value chips display the name or logo of the chip manufacturer.

Beyond value chips, all five jurisdictions distinguish in some way among various other types of chips, including promotional chips, non-value chips, tournament chips, roulette chips, and poker rake chips. The jurisdictions surveyed use the various terms as follows:

Promotional Chips: All states surveyed other than Ohio use the term “promotional” or “souvenir non-gaming” chips to cover those chips that are marked as having no redeemable value. In Nevada, these chips are designed in accordance with the same specifications as value chips, with the exception that they are inscribed with the words “no cash value.” In New Jersey, Pennsylvania, and Maryland, these chips must be unique in terms of size and color and bear language stating that they have no redeemable value.



Massachusetts Gaming Commission

Non-value Chips/Roulette Chips: New Jersey uses the term “non- value” chip to cover roulette and pokette chips, while Ohio uses the term to cover roulette chips only. Pennsylvania and Maryland, on the other hand, use the term “roulette chips.” These chips are generally designed according to the same specifications as value chips, but do not include a denomination, are marked “roulette” or “pokette,” and must include a unique design or symbol to distinguish them from other chips.

Tournament Chips: All states surveyed use the term “tournament” chips to cover certain chips that are used solely for tournaments and are marked “no cash value.” In Nevada, these chips are designed in accordance with the same specifications as value chips, with the exception that they are inscribed with the words “no cash value.” In Ohio, these chips must be of a size, shape, and other specifications to make them distinguishable from other chips and are inscribed with the words “no cash value.” In New Jersey, Pennsylvania, and Maryland, these chips must be designed in a way that makes them distinguishable from other categories of chips and are inscribed with the word “tournament” and the words “no cash value.”

Poker Rake Chips: Of the states surveyed, only Pennsylvania and Maryland specifically regulate “poker rake” chips. Both states require that these chips be only in denominations of \$2, \$3, and \$4; be inscribed with the words “poker rake chip;” and be designed in a way that makes them distinguishable from other categories of chips.

All states surveyed regulate the process by which the gaming chips are approved for use. New Jersey, Pennsylvania, Ohio, and Maryland require that the licensee/casino operator submit for approval to the Board or Commission the design specifications including a detailed schematic of the proposed chips, along with sample chips. In Ohio, the casino operator must also submit the name and address of the chip manufacturer. The New Jersey regulations state that the design specifications must be submitted for approval prior to manufacture and do not require sample chips to be submitted until after design approval, while the remaining states simply state that design specifications and sample chips must be submitted for approval before the chips may be used.

The Nevada regulations include more detailed requirements in the chip approval process. In addition to submitting written specifications for the proposed chip, the application for approval in Nevada must include an exact drawing of the proposed chip, the name and address of the chip manufacturer, the licensee’s intended use for the proposed chip, and verification from the manufacturer that it has a written system of internal controls approved by the Chairman which ensure the integrity and security of the manufacturing process from design to shipment.¹ The application is reviewed first and, if the Chairman is satisfied with the application, the licensee or manufacturer then provides a sample.

¹ Regulation 12.020 includes detailed description of internal control requirements.

B. Plaques

In addition to chips, New Jersey, Pennsylvania, and Maryland regulate certain specifications for gaming plaques, which are larger tokens typically used for high-stakes table games. All three states require that the plaques be square, rectangular, or elliptical in shape; have at least two faces; and have two to six smooth surfaces. They also regulate the size of the plaques and require that the plaques have certain identifying characteristics, including denomination, name of the licensee, and a unique serial number. While Pennsylvania and Maryland provide that plaques may be issued in denominations of \$5,000 or \$10,000, New Jersey permits denominations of \$25,000, \$50,000, and \$100,000, as well. All three states permit the Board or Commission to approve additional denominations as it deems appropriate.

With respect to approval of plaques, New Jersey, Pennsylvania, and Maryland include the same requirements in their regulations. In all three states, licenses must submit design specifications to the Commission including a detailed schematic depicting the actual size and location of each face; the edge; and any colors, words, designs, graphics, or security measures. The licensee must also provide the Commission with a sample plaque of each denomination and submit a system of internal controls governing distribution, redemption, receipt, and inventory of plaques.

II. Other Gaming Instrumentalities

Nevada does not have individual regulations for gaming instrumentalities other than gaming chips. Instead, Nevada statutorily defines “associated equipment” as “any equipment...used remotely or directly in connection with gaming.”² This definition includes dice, playing cards, and other types of equipment discussed in this memorandum. The Nevada regulations provide that instruments used for gaming, other than chips and tokens, must be of such size, shape, and design and have such other specifications as the Chairman may approve or require. The regulations further outline the application and approval process for all associated equipment. Application must include, at a minimum, (1) name, permanent address, social security number, and driver’s license number of the manufacturer or distributor; (2) a complete, comprehensive, and technically accurate description and explanation of the associated equipment and its intended usage; (3) detailed operating procedures for the associated equipment; (4) the standards under which tests were performed and the results of such testing that confirms the associated equipment is functioning as represented; and (5) all materials relating to the results of the registered independent testing laboratory’s inspection and certification process.

² Full text of definition: Any equipment or mechanical, electromechanical or electronic contrivance, component or machine used remotely or directly in connection with gaming or mobile gaming, any game, race book or sports pool that would not otherwise be classified as a gaming device, including dice, playing cards, links which connect to progressive slot machines, equipment which affects the proper reporting of gross revenue, computerized systems of betting at a race book or sports pool, computerized systems for monitoring slot machines and devices for weighing or counting money.” NRS 463.0136.

In addition to the application, the Nevada regulations include provisions related to samples and field trials. Pursuant to Nevada's regulations, the Chairman may require that up to two working models of associated equipment be submitted to the Board's new game lab or another location for review and inspection, the cost of which is paid by the manufacturer seeking approval. Further, the Chairman may require that the associated equipment be tested at licensed gaming establishments for not more than 180 days.

Unlike Nevada, New Jersey, Pennsylvania, Ohio, and Maryland all have specific regulations governing various types of gaming instrumentalities including playing cards, dice, dealing shoes, pai gow tiles, roulette wheels, wheels used for big six wheel, and game tables.

A. Playing Cards

All states surveyed other than Nevada require that the decks of playing cards used by casinos consist of 52 cards with each card identical in size and shape to every other card, that those 52 cards be composed of cards in four suits, and that each of those four suits be composed of the same 13 cards.

All states surveyed other than Nevada also regulate the deck packaging, which must be done in a way that would reveal any possible tampering, and card design, which must be designed in a way that will assist in preventing concealed markings from being placed thereon. In addition, those four states regulate the design for poker cards, which must be visually distinguishable from the cards used for other types of table games and made of plastic.³

All states surveyed other than Nevada require that playing cards be approved before they may be used in a gaming facility. In New Jersey and Ohio, the design to be used on the backs of the cards must be submitted for approval prior to use. Pennsylvania and Maryland require the licensee to submit for approval a detailed schematic depicting the face and backs of cards along with the colors, words, designs, and graphics to be used.

B. Dice

New Jersey, Pennsylvania, Ohio, and Maryland regulate the size, material, and other specifications of dice to be used for gaming. In particular, all four states require that dice be transparent,⁴ have all corners forming 90 degree angles, have identically-textured sides, have evenly distributed weight, and have the name or trade name of the licensee imprinted thereon. Each state also regulates the layout of the dice, *i.e.*, which numbers appear on which sides.

³ Of the states that explicitly regulate poker cards, Ohio is the only one that does not require that they be made of plastic.

⁴ All states use the term "transparent," but "translucent" would be a more appropriate term.

New Jersey, Pennsylvania, and Maryland have separate regulations for dice used specifically for pai gow (with the allowable dice size being smaller than the size allowed under the standard dice regulations), while Pennsylvania and Ohio have separate regulations for dice used specifically for sic bo (with the allowable dice size being smaller than the size allowed under the standard dice regulations and permissible ball edges).

Pennsylvania and Maryland require the licensee to submit for approval a detailed schematic depicting the actual size and color of the dice, location of serial numbers, and location of letters or logos. Ohio's approval process requires that a picture and a sample be submitted for approval prior to use. Nevada and New Jersey, however, do not have any regulations regarding an approval process for dice.

C. Dealing Shoes

New Jersey, Pennsylvania, and Maryland have virtually identical regulations regarding the construction and specifications of dealing shoes, which include color, transparency, and automatic stop requirements to prevent cards waiting to be dealt from being revealed. All three states also have unique regulatory specifications related to dealing shoes used in the game of baccarat, which include a requirement that the dealing shoe have an opaque removable lid, while New Jersey's regulations also include unique specifications related to dealing shoes used in the games of Blackjack, Spanish 21, and Pai Gow, which include additional marking requirements to assist the dealer. Finally, Pennsylvania and Maryland regulate automatic shuffling devices, which are required to meet a 95 percent confidence level in both states. None of the states surveyed include any particular approval process prior to the use of dealing shoes.

Gaming Laboratories International (GLI) released a standard, GLI-29, in 2012 regarding card shufflers and dealer shoes. Although no states surveyed have formally adopted this standard, it is worth the Commission's review. GLI-29 requires that each electronic shuffling device and dealing shoe bear, at a minimum, (1) the name of the manufacturer; (2) a unique serial number; (3) the model number; and (4) the date of manufacture. With respect to card shufflers, GLI-29 provides that they must be designed so that they can eradicate any patterns introduced to the cards before being placed in the device, their operation cannot be interfered with or interrupted without detection, they can dispense cards without leaving any marks or causing any damage to the cards, and they cannot provide any real time information that can be used to aid in projecting outcomes or tracking cards. With respect to dealing shoes, GLI-29 provides that they must be designed to facilitate the dealing of cards without revealing their face value, to have a cover that obscures the back of the cards in the shoe, to prohibit any markings on the cards, and not to include any hidden compartments.

D. Pai Gow Tiles

New Jersey, Pennsylvania, and Maryland require that pai gow tiles consist of a set of 32 rectangular blocks identical in size and shading. All three states have virtually identical

regulations relating to the size, color, and features of pai gow tiles, which include requirements that the tiles be non-transparent, have flat surfaces, have a unique mark identifying the licensee, and have no markings other than the front identifying spots that would distinguish one tile from another. While New Jersey does not have any regulations explicitly outlining the approval process for pai gow tiles, Pennsylvania and Maryland require the licensee to submit for approval a detailed schematic depicting the actual size and identifying features of the tiles.

E. Roulette Wheel and Ball

New Jersey, Pennsylvania, and Maryland regulate the size and specifications of both roulette wheels and roulette balls, requiring that roulette wheels be no less than 30 inches in diameter and be of either a single zero wheel or double zero wheel variety,⁵ and requiring that roulette balls be non-metallic and of a particular size. All three states have virtually identical regulations in this category except that New Jersey's regulations do not include a specific approval process for the roulette wheel and roulette balls while Pennsylvania and Maryland require that the layout of the roulette wheel be submitted for approval prior to use.

F. Big Six Wheel

New Jersey, Pennsylvania, and Maryland regulate the shape, size, and specifications for the wheel used in the game of Big Six Wheel, with all three states having virtually identical regulations. In all three states, the regulations outline the layout of the various sections of the wheel. In addition, Pennsylvania and Maryland include a requirement that the wheel contain a clapper device that selects a section upon conclusion of the spin. In terms of an approval process, Pennsylvania is the only state of those surveyed that explicitly requires the layout to be submitted for approval prior to use of the wheel for gaming.

G. Game Tables

There is some variation among the states surveyed in terms of how they handle regulation of the actual tables used for table games.⁶ New Jersey, Pennsylvania, and Maryland include specifications for size, shape, and layout of the table for various games within their regulations dealing with rules of the game. Ohio, on the other hand, does not include table specifications within its regulations. Instead, Ohio's regulations require that table game layouts used at a particular casino be consistent with that casino operator's internal controls. In Ohio, the unique table specifications related to size, shape, and layout are also included in the table game rules

⁵ The specifications for single zero and double zero wheels are included in the regulations for all three states.

⁶ Although Nevada's regulations do not include specifications for size, shape, and layout of the tables used for various table games, they do include specifications related to drop boxes used at card tables. This information is omitted from this memorandum because drop box specifications and procedures are more appropriately addressed in the Commission's forthcoming table game internal control regulations.

published on each individual casino's website. None of the states surveyed include an approval process for table design or layout specifications.

III. Next Steps for the Commission

Before drafting the Commission's table game equipment regulations, the following questions should be considered:

- a. What will be the Commission's design specifications for value chips?
- b. How will the Commission distinguish among value chips and various types of non-value chips?
- c. Will the Commission regulate gaming plaques? If so, what will be the Commission's design specifications and approval process?
- d. Will the Commission promulgate specific regulations for gaming instrumentalities other than chips (e.g., cards, dice, tiles, wheels, gaming shoes, gaming tables)? Will the Commission promulgate regulations outlining an approval process for these instrumentalities?

**MULTI-STATE SURVEY OF
TABLE GAME EQUIPMENT REGULATIONS**

	Nevada	New Jersey	Pennsylvania	Ohio	Maryland
Value Chips	<p>Does not include specifications for denominations or colors.</p> <p>Includes specifications for size (.130 in thick; diameter of 1.55 in or 1.6875 depending on use). 12.040.</p> <p>Must include (1) name of issuing gaming establishment; (2) city and state where establishment is located; (3) denomination (unless chips are used solely for roulette); (4) manufacturer's name or logo.</p> <p>12.030</p>	<p>Includes specifications for denominations (\$0.25 through \$25,000), size (diameter of 1 9/16 in or 1 11/16 in depending on denomination), and color of chips.</p> <p>Must include (1) denomination; (2) name or approved ID of licensee; (3) anti-counterfeiting measures; (4) the words "Atlantic City" or "New Jersey"; (5) the primary color of the chip; and (6) edge spot specifications as outlined in regulations.</p> <p>NJAC 13:69E-1.3</p>	<p>Includes specifications for denominations (\$1 through \$5,000) and color of chips.</p> <p>Must include (1) denomination; (2) name, logo, or other approved identification of the licensee; (3) the letters "PA" and the name of the city where the licensed facility is located; (4) edge spot specifications as outlined in regulations.</p> <p>58 PA ADC 603a.3</p>	<p>Includes specifications for denominations (\$1 through \$25,000), size (39mm diameter or 43mm diameter depending on value), and color of chips.</p> <p>Must be round and must include (1) the name of the city where the casino is located; (2) the name or logo of the manufacturer; (3) denomination; and (4) name of issuing casino.</p> <p>Must use a different center shape for each denomination.</p> <p>OAC 3772-11-11</p>	<p>Includes specifications for denominations (\$1 through \$25,000), size (diameter of 1 9/16 in or 1 11/16 in depending on denomination), and color of chips.</p> <p>Must include (1) denomination; (2) name, logo, or other approved identification of the licensee; (3) the letters "MD" and the name of the city where the licensed facility is located; (4) if valued at \$100 or more, a design unique to the manufacturer; and (5) edge spot specifications as outlined in regulations.</p> <p>COMAR 36.05.02.03</p>
Non-Value Chips	<p><i>Does not use the term "non-value chips" but see below.</i></p>	<p>Do not contain a denomination and are used for gaming at roulette and pokette. Must include (1) name or ID of licensee; (2) design or symbol that will distinguish them from value chips; (3) the word "roulette" or "pokette"; (4) approved color and design combinations to distinguish each player's non-value chips from each</p>	<p><i>Does not include any chips called "non-value chips," but see promotional, tournament, roulette, and poker rake chips below</i></p>	<p>Issued solely for roulette. Shall be used only at a particular roulette table.</p> <p>Must include (1) name of the casino; (2) a design or symbol distinguishing it from non-value chips being used at each other roulette table; (3) the word "roulette."</p> <p>OAC 3772.11.11</p>	

	Nevada	New Jersey	Pennsylvania	Ohio	Maryland
		<p>other's; (5) edge spot specifications as outlined in regulations.</p> <p>NJAC 13:69E-1.4</p>			
Promotional Chips	<p>Designed in accordance with above specifications, except must be inscribed "no cash value"</p> <p>12.090</p>	<p>Called "souvenir non-gaming chips." Must (1) be unique in terms of size or color; (2) have no edge designs unique to gaming chips; and (3) bear the name of the licensee and language stating that they have no redeemable value.</p> <p>NJAC 13:69E-1.1</p>	<p>Must be unique in terms of size or color, have no edge designs, bear the name of the certificate holder issuing the chips, and bear language on both sides stating that they have no redeemable value.</p> <p>58 PA ADC 603a.2</p>	<i>No regulations</i>	<p>Must (1) be unique in terms of size or color; (2) have no edge designs unique to gaming chips; and (3) bear the name of the licensee and language stating that they have no redeemable value.</p> <p>COMAR 36.05.02.02</p>
Tournament Chips	<p>Designed in accordance with above specifications, except must be inscribed "no cash value"</p> <p>12.090</p>	<p>No cash value and used solely for tournaments. Must include (1) name or ID of licensee; (2) design or symbol that will distinguish them from value and non-value chips; (3) the denomination; (4) the words "tournament" and "no cash value"; (5) approved color and design combinations.</p> <p>NJAC 13:69E-1.4A</p>	<p>Must include (1) name, logo, or other approved identification of licensee; (2) the word "tournament"; (3) denomination; (4) the phrase "no cash value"; and (5) color or design combinations that readily distinguish tournament chips from roulette, value, and poker rake chips.</p> <p>58 PA ADC 603a.6</p>	<p>Designed in accordance with above specifications except that they must be of a size, shape, and such other specifications to make them distinguishable from other types of chips and must be inscribed with the words "no cash value."</p> <p>OAC 3772-11-18</p>	<p>Must include (1) name, logo, or other approved identification of licensee; (2) the word "tournament"; (3) denomination; (4) the phrase "no cash value"; and (5) color or design combinations that readily distinguish tournament chips from roulette, value, and poker rake chips.</p> <p>COMAR 36.05.02.06</p>
Roulette Chips	<i>No regulations specific to roulette chips.</i>	<i>See non-value chips, above</i>	<p>Must include (1) name, logo, or other approved identification of licensee; (2) a unique design or symbol that distinguish roulette chips at one table from roulette chips at another table; (3) the word "roulette"; (4) color and</p>	<i>See non-value chips, above</i>	<p>Must include (1) name, logo, or other approved identification of licensee; (2) a unique design or symbol that distinguish roulette chips at one table from roulette chips at another table; (3) the word "roulette"; (4) color and</p>

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			<p>design combinations that readily distinguish the roulette chips of each player at a table from the roulette chips of others and from the value chips; and (5) edge spot specifications as outlined in regulations.</p> <p>58 PA ADC 603a.4</p>		<p>design combinations that readily distinguish the roulette chips of each player at a table from the roulette chips of others and from the value chips; and (5) edge spot specifications as outlined in regulations.</p> <p>COMAR 36.05.02.04</p>
Poker Rake Chips	<i>No regulations specific to poker rake chips.</i>	<i>No regulations specific to poker rake chips.</i>	<p>Denominations of \$2, \$3, and \$4</p> <p>Must include (1) name, logo, or other approved identification of licensee; (2) the words “poker rake chip”; (3) denomination; and (4) color or design combinations that readily distinguish poker rake chips from roulette, tournament, and value chips.</p> <p>58 PA ADC 603a.7</p>	<i>No regulations specific to poker rake chips.</i>	<p>Denominations of \$2, \$3, and \$4</p> <p>Must include (1) name, logo, or other approved identification of licensee; (2) the words “poker rake chip”; (3) denomination; and (4) color or design combinations that readily distinguish poker rake chips from roulette, tournament, and value chips.</p> <p>COMAR 36.05.02.07</p>

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Approval of Chips	<p>Application must include (1) an exact drawing of each side and the edge of the proposed chip; (2) written specifications for the proposed chip; (3) name and address of manufacturer; (4) licensee’s intended use for the proposed chip; (5) verification from manufacturer that it has a written system of internal controls approved by the Chairman which ensure the integrity and security of the manufacturing process from design through shipment.</p> <p>If Chairman is satisfied with application, licensee or manufacturer provides a sample.</p> <p>Chairman provides approval in writing.</p> <p>12.020</p>	<p>Design specifications are submitted to the Division for approval prior to manufacture. Submission must include a detailed schematic depicting the actual size and location of the face, the edge, and any designs or security measures. Following design approval, a sample of 20 chips is submitted for approval.</p> <p>NJAC 13:69E-1.1</p>	<p>Design specifications are submitted to Bureau of Gaming Operations. Submission must include a detailed schematic depicting the actual size and location of each face, the edge, and any colors, words, designs or security measures. A sample of each chip must be made available to the Bureau of Casino Compliance for its inspection and approval at the licensed facility.</p> <p>58 PA ADC 603a.2</p>	<p>Casino operator submits to Executive Director for approval a sample of each denomination of value and non-value chips. Submission must include a detailed schematic of the proposed chips and sample chips. Casino operator must also submit the name and address of the manufacturer to the Commission.</p> <p>ED must approve in writing.</p> <p>OAC 3772-11-12</p>	<p>Casino operator submits to the Commission for approval the design specifications of the proposed chip, including a detailed schematic depicting the actual size and location of each face, the edge, and any colors, words, designs, or security measures on the chip. Submission must also include a sample of each chip. Commission must approve prior to use.</p> <p>COMAR 36.05.02.02 and COMAR 36.05.03.16</p>

	Nevada	New Jersey	Pennsylvania	Ohio	Maryland
Gaming Plaques		<p>Must be square, rectangular, or elliptical; have 2-6 smooth surfaces; have at least two faces.</p> <p>Face of a square plate must have surface area of at least 9 square inches. Face of a rectangular or elliptical plaque must be at least 3 inches in length and 2 inches in width.</p> <p>May be issued in denominations of \$5,000, \$10,000, \$25,000, \$50,000, and \$100,000, and in such quantities as the casino may deem proper to conduct gaming.</p> <p>Must include identifying characteristics including (1) denomination; (2) name, trade name, or other approved ID of licensee; (3) unique serial number.</p> <p>NJAC 13:69E-1.6</p>	<p>Must be square, rectangular, or elliptical; have 2-6 smooth surfaces; have at least two faces.</p> <p>Face of a square plate must have surface area of at least 9 square inches. Face of a rectangular or elliptical plaque must be at least 3 inches in length and 2 inches in width.</p> <p>May be issued in denominations of \$5,000 or \$10,000, and in others approved by the Board's ED.</p> <p>Must include identifying characteristics including (1) denomination; (2) name, logo, or other approved ID of certificate holder; (3) unique serial number.</p> <p>58 PA ADC 603a.9</p>		<p>Must be square, rectangular, or elliptical; have 2-6 smooth surfaces; have at least two faces.</p> <p>Face of a square plaque must have surface area of at least 9 inches. Face of a rectangular or elliptical plaque must be at least 3 inches in length and 2 inches in width.</p> <p>May be issued in denominations of \$5,000 or \$10,000, and in others approved by the Commission.</p> <p>Must include identifying characteristics including (1) denomination; (2) name, logo, or other approved ID of facility operator; (3) unique serial number.</p> <p>COMAR 36.05.02.09</p>

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Gaming Plaques Approval		<p>Licensee must submit design specifications to the Commission including a detailed schematic depicting the actual size and location of each face; the edge; and any colors, words, designs graphics or security measures. Licensee must also provide to the Commission a sample plaque of each denomination and must submit a system of internal controls governing distribution, redemption, receipt, and inventory.</p> <p>NJAC 13:69E-1.6</p>	<p>Certificate holder must submit design specifications to the Commission including a detailed schematic depicting the actual size and location of each face; the edge; and any colors, words, designs graphics or security measures. Certificate holder must also provide to the Commission a sample plaque of each denomination and must submit a system of internal controls governing distribution, redemption, receipt, and inventory.</p> <p>58 PA ADC 603a.9</p>		<p>Facility operator must submit design specifications to the Commission including a detailed schematic depicting the actual size and location of each face; the edge; and any colors, words, designs graphics or security measures. Facility operator must also provide to the Commission a sample plaque of each denomination and must submit a system of internal controls governing distribution, redemption, receipt, and inventory.</p> <p>COMAR 36.05.02.09</p>
Card Decks	<p>See NRS 463.0136 defining “associated equipment” as “any equipment...used remotely or directly in connection with gaming” and Regulations 14.260-280 regarding approval of associated equipment. Also see Regulation 12.100 Other Instrumentalities: Instruments used for gaming (other than chips and tokens) must be of such size, shape, and design and have such other specifications as the chairman may approve or require.</p>	<p>Must be in decks of 52 cards with each card identical in size and shape to every other card in the deck. Each deck shall be composed of cards in four suits: diamonds, spades, clubs, and hearts. Each suit shall be composed of 13 cards: ace, king, queen, jack, 10, 9, 8, 7, 6, 5, 4, 3, 2.</p> <p>Nothing shall prohibit a manufacturer from manufacturing decks of cards with one or more jokers, provided that such jokers shall not be used by the licensee in any games other than pai gow poker, two-card joker poker,</p>	<p>Must be in decks of 52 cards with each card identical in size and shape to every other card in the deck. Each deck shall be composed of cards in four suits: diamonds, spades, clubs, and hearts. Each suit shall be composed of 13 cards: ace, king, queen, jack, 10, 9, 8, 7, 6, 5, 4, 3, 2.</p> <p>58 PA ADC 603a.15</p>	<p>Must be in decks of 52 cards with each card identical in size and shape to every other card in the deck. Each deck shall be composed on cards in four suits: diamonds, spades, clubs, and hearts. Each suit shall be composed of 13 cards: ace, king, queen, jack, 10, 9, 8, 7, 6, 5, 4, 3, 2.</p> <p>OAC 3772-11-22</p>	<p>Must be in decks of 52 cards with each card identical in size and shape to every other card in the deck. Each deck shall be composed of cards in four suits: diamonds, spades, clubs, and hearts. Each suit shall be composed of 13 cards: ace, king, queen, jack, 10, 9, 8, 7, 6, 5, 4, 3, 2.</p> <p>COMAR 36.05.02.15</p>

	Nevada	New Jersey	Pennsylvania	Ohio	Maryland
		asia poker, or supreme pai gow. NJAC 13:69E-1.17			
Deck Packaging	<i>See above</i>	Each deck shall be packaged separately or in a set containing the number of decks authorized by the Division and selected by the licensee for use in a particular table game. Each package shall be sealed in a manner to reveal evidence of any tampering with the package. If multiple decks of cards are packaged and sealed in a batch, the package must have a label showing an adequate description of the contents including the (1) name of the licensee for which the cards were manufactured; (2) type of cards; (3) colors of the backs of the cards; (4) date and time the cards were manufactured; (5) total number of cards in the set. NJAC 13:69E-1.17	Each deck shall be packaged separately or in a batch containing the number of decks authorized by the regs and selected by the facility operator for use in a particular table game. Each package shall be sealed in a manner approved by the Commission to reveal evidence of any tampering with the package. If multiple decks of cards are packaged and sealed in a batch, the package must have a label showing an adequate description of the contents including the (1) name of the certificate holder for which the cards were manufactured; (2) colors of the backs of the cards; (3) date the cards were manufactured; (4) total number of cards in the batch; (5) total number of decks in the batch. 58 PA ADC 603a.15	Shall be wrapped with cellophane or similar material as documented in ICs and approved by Commission. Casino operators may use packages containing multiple pre-shuffled decks supplied by a vendor whose quality controls have been approved by the Commission. Casino operators shall reshuffle and verify every tenth package that contains multiple pre-shuffled decks. OAC 3772-11-22	Each deck shall be packaged separately or in a batch containing the number of decks selected by the facility operator for use in a particular table game. Each package shall be sealed in a manner approved by the Commission to reveal evidence of any tampering with the package. If multiple decks of cards are packaged and sealed in a batch, the package must have a label showing an adequate description of the contents including the (1) name of the facility for which the cards were manufactured; (2) colors of the backs of the cards; (3) date the cards were manufactured; (4) total number of cards in the batch; (5) total number of decks in the batch. COMAR 36.05.02.15
Card Design	<i>See above</i>	The backs of each card shall (1) be identical and may not contain any marking or symbol that would differentiate a card from other cards; (2) be designed to	The backs of each card shall (1) be identical and may not contain any marking or symbol that would differentiate a card from other cards; (2) be designed to	The backs of all cards shall (1) be identical and may not contain any marking or symbol that would differentiate a card from other cards; (2) be designed to	The backs of each card shall (1) be identical and may not contain any marking or symbol that would differentiate a card from other cards; (2) be designed to

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		diminish the ability of an individual to place concealed markings thereon; and (3) contain the name or logo of the licensee. If approved in advance by the Commission, the face of the ace, king, queen, jack, and 10 may contain an additional marking that will permit a dealer, prior to exposing the dealer’s hole card in blackjack, to determine if the value of the hole card gives the dealer a blackjack. The design to be used on the backs of the cards shall be submitted to the Division for approval before use of the cards. NJAC 13:69E-1.17	diminish the ability of an individual to place concealed markings thereon; and (3) contain the name or logo of the certificate holder. If approved in advance by the Commission, the face of the ace, king, queen, jack, and 10 may contain an additional marking that will permit a dealer, prior to exposing the dealer’s hole card in blackjack, to determine if the value of the hole card gives the dealer a blackjack. 58 PA ADC 603a.15	diminish the ability of an individual to place concealed markings thereon; and (3) contain the name or trade name of the facility. If approved in advance by the Commission, the face of the ace, king, queen, jack, and 10 may contain an additional marking that will permit a dealer, prior to exposing the dealer’s hole card in blackjack, to determine if the value of the hole card gives the dealer a blackjack. The design to be used on the backs of the cards shall be submitted to the ED for approval before use of the cards. OAC 3772-11-22	diminish the ability of an individual to place concealed markings thereon; and (3) contain the name or logo of the facility. If approved in advance by the Commission, the face of the ace, king, queen, jack, and 10 may contain an additional marking that will permit a dealer, prior to exposing the dealer’s hole card in blackjack, to determine if the value of the hole card gives the dealer a blackjack. COMAR 36.05.02.15
Poker Cards	<i>See above</i>	Must be (1) visually distinguishable from the cards used for other table games; (2) made of plastic. Licensee offering poker must have and use on a daily basis at least four visually distinguishable card backings for the cards used in poker. NJAC 13:69E-1.17	Must be (1) visually distinguishable from the cards used for other table games; (2) made of plastic. Certificate holder offering poker must have and use on a daily basis at least four visually distinguishable card backings for the cards used in poker. 58 PA ADC 603a.15	Must be (1) visually distinguishable from the cards used for other table games. OAC 3772-11-22	Must be (1) visually distinguishable from the cards used for other table games; (2) made of plastic. Facility operator offering poker must have and use on a daily basis at least four visually distinguishable card backings for the cards used in poker. COMAR 36.05.02.15
Approval of Cards	Pursuant to “associated equipment” regulations, must submit application including, at a minimum, (1) name, permanent address, social	<i>Approvals built in above.</i>	Must submit a schematic depicting face and backs of the cards, the colors, words, designs, and graphics to the Bureau of Gaming Operations.	<i>Approvals built in above.</i>	Must submit a schematic depicting face and backs of the cards, the colors, words, designs, and graphics to the Commission.

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	<p>security number, and driver’s license number of manufacturer or distributor; (2) complete description and explanation of the associated equipment and its intended usage; (3) detailed operating procedures for the associated equipment; (4) standards under which tests were performed and the results of such testing that confirms the associated equipment is functioning as represented; and (5) all materials relating to the results of the registered independent testing laboratory’s inspection and certification process.</p> <p>Chairman may also require submission of 1-2 working models for review and inspection, and may require that the associated equipment be tested at licensed gaming establishments for not more than 180 days.</p> <p>14.260-280</p>		58 PA ADC 603a.15		COMAR 36.05.02.15
Dice	See NRS 463.0136 defining “associated equipment” as “any equipment...used remotely or directly in connection with gaming” and Regulations 14.260-280 regarding approval of associated equipment. Also see Regulation 12.100 Other	Must (1) be a cube no smaller than .750 inch on each side and no larger than .775 inch on each side; (2) be transparent and made exclusively of cellulose except for the spots, name, or trade name of the licensee and serial numbers or letters; (3) have	Must (1) be a cube no smaller than .750 inch on each side and no larger than .775 inch on each side, with a tolerance of +/- .0005; (2) be transparent and made exclusively of cellulose except for the spots, name, or trade name of the certificate holder and serial	Must (1) be a cube no smaller than .750 inch on each side and no larger than .775 inch on each side; (2) be transparent and made exclusively of cellulose except for the spots, name, or trade name of the facility and serial numbers or letters; (3) have	Must (1) be a cube no smaller than .750 inch on each side and no larger than .775 inch on each side, with a tolerance of +/- .0005; (2) be transparent and made exclusively of cellulose except for the spots, name, or trade name of the facility

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	<p>Instrumentalities: Instruments used for gaming (other than chips and tokens) must be of such size, shape, and design and have such other specifications as the chairman may approve or require.</p>	<p>flat surfaces spots flush with the area surrounding them; (4) have all edges and corners square and forming 90 degree angles; (5) have the texture and finish of each side identical to the texture and finish of all other sides; (6) have its weight equally distributed; (7) have six sides with white circular spots from one to six, with the diameter of each spot equal to the diameter of all other spots; (8) have spots arranged so the side with one spot is opposite the side with six spots, two spots oppose five spots, three spots opposite four spots, and have each spot extend into the cube the same distance as all other spots to an accuracy tolerance of .0004 inch; and (9) have the name or trade name of the licensee imprinted on it.</p> <p>NJAC 13:69E01.15</p>	<p>numbers or letters; (3) have flat surfaces spots flush with the area surrounding them; (4) have all edges and corners square and forming 90 degree angles; (5) have the texture and finish of each side identical to the texture and finish of all other sides; (6) have its weight equally distributed; (7) have six sides with white circular spots from one to six, with the diameter of each spot equal to the diameter of all other spots; (8) have spots arranged so the side with one spot is opposite the side with six spots, two spots oppose five spots, three spots opposite four spots, and have each spot extend into the cube the same distance as all other spots to an accuracy tolerance of .0004 inch; and (9) have the name or trade name of the certificate holder operator imprinted on it.</p> <p>58 Pa. Code 603a.12</p>	<p>flat surfaces spots flush with the area surrounding them; (4) have all edges and corners square and forming 90 degree angles; (5) have the texture and finish of each side identical to the texture and finish of all other sides; (6) have its weight equally distributed; (7) have six sides with white circular spots from one to six, with the diameter of each spot equal to the diameter of all other spots; (8) have spots arranged so the side with one spot is opposite the side with six spots, two spots oppose five spots, three spots opposite four spots, and have each spot extend into the cube the same distance as all other spots to an accuracy tolerance of .0004 inch; and (9) have the name or trade name of the facility imprinted on it.</p> <p>OAC 3772-11-20</p>	<p>operator and serial numbers or letters; (3) have flat surfaces spots flush with the area surrounding them; (4) have all edges and corners square and forming 90 degree angles; (5) have the texture and finish of each side identical to the texture and finish of all other sides; (6) have its weight equally distributed; (7) have six sides with white circular spots from one to six, with the diameter of each spot equal to the diameter of all other spots; (8) have spots arranged so the side with one spot is opposite the side with six spots, two spots oppose five spots, three spots opposite four spots, and have each spot extend into the cube the same distance as all other spots to an accuracy tolerance of .0004 inch; and (9) have the name or trade name of the facility operator imprinted on it.</p> <p>COMAR 36.05.02.12</p>
Pai Gow Dice	<i>See above</i>	<p>Must comply with above requirements except (1) each die shall a cube with a size no smaller than .637 inch of each side and no larger than .643 inch of each side; (2) instead of the name of the casino, a licensee may, with the approval of the Division, have an identifying mark or logo</p>	<p>Must comply with above requirements except (1) each die shall a cube with a size no smaller than .637 inch of each side and no larger than .643 inch of each side; (2) instead of the name of the casino, a certificate holder may, with the approval of the Commission, have an</p>	<i>No regulations specific to pai gow dice</i>	<p>Must comply with above requirements except (1) each die shall a cube with a size no smaller than .637 inch of each side and no larger than .643 inch of each side; (2) instead of the name of the casino, a licensee may, with the approval of the Commission, have an identifying mark or</p>

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		imprinted on the die; (3) the spots do not have to be equal in diameter. NJAC 13:69E01.15	identifying mark or logo imprinted on the die; (3) the spots do not have to be equal in diameter. 58 Pa. Code 603a.12		logo imprinted on the die; (3) the spots do not have to be equal in diameter. COMAR 36.05.02.12
Sic Bo Dice	<i>See above</i>	<i>No regulations specific to sic bo dice</i>	Must comply with standard characteristics, except that each die used in an automated sic bo shaker may be a cube .625 inch on each side with ball edge corners. 58 Pa. Code 603a.12	<i>No regulations specific to sic bo dice</i>	Must comply with standard characteristics, except that each die may be a cube .625 inch on each side with ball edge corners. COMAR 36.05.02.12
Approval of Dice	Pursuant to “associated equipment” regulations, must submit application including, at a minimum, (1) name, permanent address, social security number, and driver’s license number of manufacturer or distributor; (2) complete description and explanation of the associated equipment and its intended usage; (3) detailed operating procedures for the associated equipment; (4) standards under which tests were performed and the results of such testing that confirms the associated equipment is functioning as represented; and (5) all materials relating to the results of the registered independent testing laboratory’s inspection and	<i>No regulations</i>	Detailed schematic depicting actual size and color of the dice, location of serial numbers, and location of letters or logos must be submitted to Bureau of Gaming Operations for approval. 58 Pa. Code 603a.12	A picture and sample must be submitted to the ED for approval before use. OAC 3772-11-20	Detailed schematic depicting actual size and color of the dice, location of serial numbers, and location of letters or logos must be submitted to and approved by the Commission. COMAR 36.05.02.12

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	<p>certification process.</p> <p>Chairman may also require submission of 1-2 working models for review and inspection, and may require that the associated equipment be tested at licensed gaming establishments for not more than 180 days.</p> <p>14.260-280</p>				
Dealing Shoes	<p>See NRS 463.0136 defining “associated equipment” as “any equipment...used remotely or directly in connection with gaming” and Regulations 14.260-280 regarding approval of associated equipment. Also see Regulation 12.100 Other Instrumentalities: Instruments used for gaming (other than chips and tokens) must be of such size, shape, and design and have such other specifications as the chairman may approve or require.</p>	<p>At a minimum, (1) first four inches of the base plate must be white; (2) sides of the shoe below the base plate must be transparent or have a transparent sealed cutout unless the shoe is otherwise constructed to prevent any object from being placed into or removed from the portion below the base plate and to permit the inspection of this portion; (3) a stop underneath the top of the face shall preclude the next card to be dealt from moving upwards for more than 1/8 inch distance.</p> <p>NJAC 13:69E-1.19</p>	<p>At a minimum, (1) first four inches of the base plate must be white; (2) sides of the shoe below the base plate must be transparent or have a transparent sealed cutout unless the shoe is otherwise constructed to prevent any object from being placed into or removed from the portion below the base plate and to permit the inspection of this portion; (3) a stop underneath the top of the face shall preclude the next card to be dealt from moving upwards for more than 1/8 inch distance.</p> <p>58 Pa. Code 603a.17</p>	<i>No regulations</i>	<p>At a minimum, (1) first four inches of the base plate must be white; (2) sides of the shoe below the base plate must be transparent or have a transparent sealed cutout unless the shoe is otherwise constructed to prevent any object from being placed into or removed from the portion below the base plate and to permit the inspection of this portion; (3) a stop underneath the top of the face shall preclude the next card to be dealt from moving upwards for more than 1/8 inch distance.</p> <p>COMAR 36.05.02.17</p>
Dealing Shoes for Baccarat	<i>See above</i>	<p>In addition to above, (1) a removable lid shall be opaque from the point where it meets the face plate to a point at least four inches from the face</p>	<p>In addition to above, (1) a removable lid shall be opaque from the point where it meets the face plate to a point at least four inches from the face</p>	<i>No regulations</i>	<p>In addition to above, (1) a removable lid shall be opaque from the point where it meets the face plate to a point at least four inches from the face</p>

	Nevada	New Jersey	Pennsylvania	Ohio	Maryland
		plate; (2) the sides and back above the base plate shall be opaque; and (3) a device within the shoe shall, when engaged, prevent the cards from moving backward in the shoe. NJAC 13:69E-1.19	plate; (2) the sides and back above the base plate shall be opaque; and (3) a device within the shoe shall, when engaged, prevent the cards from moving backward in the shoe. 58 Pa. Code 603a.17		plate; (2) the sides and back above the base plate shall be opaque; and (3) a device within the shoe shall, when engaged, prevent the cards from moving backward in the shoe. COMAR 36.05.02.17
Dealing Shoes for Blackjack and Spanish 21	<i>See above</i>	In addition to the above, shall have a mark on the side that enables the dealer, after aligning the stacks of cards against the shoe, to insert the cutting card in such stack so that approximately 1/4 of the stack is behind the cutting card. NJAC 13:69E-1.19	<i>No regulations</i>	<i>No regulations</i>	<i>No regulations</i>
Dealing Shoes for Pai Gow	<i>See above</i>	In addition to above, may also contain a device on the front of the face plate that precludes the players from viewing the next card to be dealt. NJAC 13:69E-1.19	<i>No regulations</i>	<i>No regulations</i>	<i>No regulations</i>
Automatic Shuffling Device	<i>See above</i>	<i>No regulations</i>	Must meet a 95 percent confidence level using a standard chi-squared test for goodness of fit. 58 Pa. Code 603a.17	<i>No regulations</i>	Must meet a 95 percent confidence level using a standard chi-squared test for goodness of fit. COMAR 36.05.02.17

	Nevada	New Jersey	Pennsylvania	Ohio	Maryland
Pai Gow Tiles	See NRS 463.0136 defining “associated equipment” as “any equipment...used remotely or directly in connection with gaming” and Regulations 14.260-280 regarding approval of associated equipment. Also see Regulation 12.100 Other Instrumentalities: Instruments used for gaming (other than chips and tokens) must be of such size, shape, and design and have such other specifications as the chairman may approve or require.	Set of 32 rectangular blocks identical in size and shading. Each tile must (1) be a rectangle made of non-transparent black material and be no smaller than 2.5 inches in length, 1 inch in width, and .375 inch in thickness; (2) have perfectly flat surfaces except that the front side of each tile shall contain spots which extend into the tile exactly the same distance as every other spot; (3) have on the back an identifying feature unique to each casino; (4) have identical texture and finish on all sides but the front; (5) have identical backs and sides, and not have any marking or design that will enable a person to know the identity of any element of the front side or that will distinguish it from other tiles; (6) have identifying spots on the front of the tiles which are either red or white or both. NJAC 13:69E-1.19A	Set of 32 rectangular blocks identical in size and shading. Each tile must (1) be a rectangle made of non-transparent black material and be no smaller than 2.5 inches in length, 1 inch in width, and 3/8 inch in thickness; (2) have perfectly flat surfaces except that the front side of each tile shall contain spots which extend into the tile exactly the same distance as every other spot; (3) have on the back an identifying feature unique to each certificate holder; (4) have the texture and finish identical on all sides but the front; (5) have identical backs and sides, and not have any marking or design that will enable a person to know the identity of any element of the front side or that will distinguish it from other tiles; (6) have identifying spots on the front of the tiles which are either red or white or both. 58 Pa. Code 603a.18	<i>No regulations</i>	Set of 32 rectangular blocks identical in size and shading. Each tile must (1) be a rectangle made of non-transparent black material and be no smaller than 2.5 inches in length, 1 inch in width, and 3/8 inch in thickness; (2) have perfectly flat surfaces except that the front side of each tile shall contain spots which extend into the tile exactly the same distance as every other spot; (3) have on the back an identifying feature unique to each facility operator; (4) have the texture and finish identical on all sides but the front; (5) have identical backs and sides, and not have any marking or design that will enable a person to know the identity of any element of the front side or that will distinguish it from other tiles; (6) have identifying spots on the front of the tiles which are either red or white or both. COMAR 36.05.02.18
Pai Gow Tiles Approval	Pursuant to “associated equipment” regulations, must submit application including, at a minimum, (1) name, permanent address, social security number, and driver’s license number of manufacturer or distributor; (2) complete description and	<i>No regulations</i>	Facility must submit to the Bureau of Gaming Operations for approval a detailed schematic depicting the actual size and identifying features on the tiles. 58 Pa. Code 603a.18	<i>No regulations</i>	Facility must submit to the Commission for approval a detailed schematic depicting the actual size and identifying features on the tiles. COMAR 36.05.02.18

	Nevada	New Jersey	Pennsylvania	Ohio	Maryland
	<p>explanation of the associated equipment and its intended usage; (3) detailed operating procedures for the associated equipment; (4) standards under which tests were performed and the results of such testing that confirms the associated equipment is functioning as represented; and (5) all materials relating to the results of the registered independent testing laboratory's inspection and certification process.</p> <p>Chairman may also require submission of 1-2 working models for review and inspection, and may require that the associated equipment be tested at licensed gaming establishments for not more than 180 days.</p> <p>14.260-280</p>				
Roulette Wheel	<p>See NRS 463.0136 defining "associated equipment" as "any equipment...used remotely or directly in connection with gaming" and Regulations 14.260-280 regarding approval of associated equipment. Also see Regulation 12.100 Other Instrumentalities: Instruments used for gaming (other than chips and tokens) must be of such size, shape,</p>	<p>Not less than 30 inches in diameter. Must be a single zero variety or double zero variety. <u>Single zero wheel</u> must have 37 equally spaced compartments around the wheel and a ring of 37 equally spaced areas to correspond to the position of the compartments with one marked zero and colored green and the others marked 1</p>	<p>Not less than 30 inches in diameter. Must be a single zero variety or double zero variety. <u>Single zero wheel</u> must have 37 equally spaced compartments around the wheel and a ring of 37 equally spaced areas to correspond to the position of the compartments with one marked zero and colored green and the others marked 1</p>	<i>No regulations</i>	<p>Not less than 30 inches in diameter. Must be a single zero variety or double zero variety. <u>Single zero wheel</u> must have 37 equally spaced compartments around the wheel and a ring of 37 equally spaced areas to correspond to the position of the compartments with one marked zero and colored green and the others marked 1</p>

	Nevada	New Jersey	Pennsylvania	Ohio	Maryland
	<p>and design and have such other specifications as the chairman may approve or require.</p> <p>See above re “associated equipment” regulations, 14.260-280, for approval process.</p>	<p>to 36 and colored alternately red and black. Regulation includes order of numbers. <u>Double zero wheel</u> must have 38 equally spaced compartments around the wheel and a ring of 38 equally spaced areas to correspond to the position of the compartments with one marked zero and colored green, one marked double-zero and colored green, and the others marked 1 to 36 and colored alternately red and black. Regulation includes order of numbers.</p> <p>NJAC 13:69E-1.7</p>	<p>to 36 and colored alternately red and black. Regulation includes order of numbers. <u>Double zero wheel</u> must have 38 equally spaced compartments around the wheel and a ring of 38 equally spaced areas to correspond to the position of the compartments with one marked zero and colored green, one marked double-zero and colored green, and the others marked 1 to 36 and colored alternately red and black. Regulation includes order of numbers.</p> <p>Layout must be submitted to and approved by the Bureau of Gaming Operations.</p> <p>58 Pa. Code 617a.1 (game rules section of regs)</p>		<p>to 36 and colored alternately red and black. Regulation includes order of numbers. <u>Double zero wheel</u> must have 38 equally spaced compartments around the wheel and a ring of 38 equally spaced areas to correspond to the position of the compartments with one marked zero and colored green, one marked double-zero and colored green, and the others marked 1 to 36 and colored alternately red and black. Regulation includes order of numbers.</p> <p>Layout must be submitted to Commission for approval prior to use.</p> <p>COMAR 36.05.07.01 (game rules section of regs)</p>
Roulette Ball	<i>See above</i>	<p>Must be made completely of non-metallic material and not be less than 12/16 of an inch nor more than 14/16 of an inch in diameter unless otherwise approved.</p> <p>NJAC 13:69E-1.7</p>	<p>Must be made completely of non-metallic material and not be less than 12/16 of an inch nor more than 14/16 of an inch in diameter unless otherwise approved.</p> <p>58 Pa. Code 617a.1 (game rules section of regs)</p>	<i>No regulations</i>	<p>Must be made completely of non-metallic material and not be less than 12/16 of an inch nor more than 14/16 of an inch in diameter unless otherwise approved.</p> <p>COMAR 36.05.07.01 (game rules section of regs)</p>
Big Six Wheel Wheel	See NRS 463.0136 defining “associated equipment” as “any equipment...used remotely or directly in	Must be circular and at least 5 feet in diameter. The rim must be divided into 54 equally spaced sections:	Must be circular and at least 5 feet in diameter. The rim must be divided into 54 equally spaced sections:		Must be circular and at least 5 feet in diameter. The rim must be divided into 54 equally spaced sections:

	Nevada	New Jersey	Pennsylvania	Ohio	Maryland
	<p>connection with gaming” and Regulations 14.260-280 regarding approval of associated equipment. Also see Regulation 12.100 Other Instrumentalities: Instruments used for gaming (other than chips and tokens) must be of such size, shape, and design and have such other specifications as the chairman may approve or require.</p> <p>See above re “associated equipment” regulations, 14.260-280, for approval process.</p>	<p>23 sections - \$1 15 sections - \$2 8 sections - \$5 4 sections - \$10 2 sections - \$20 1 section – picture of a flag, name/logo of facility, or other unique symbol 1 section – joker or other unique symbol These numbers/symbols must be arranged clockwise in a particular order outlined in regs. Each section must be covered with glass.</p> <p>Layout must be submitted to the Division prior to use.</p> <p>13:69E-1.13</p>	<p>23 sections - \$1 15 sections - \$2 8 sections - \$5 4 sections - \$10 2 sections - \$20 1 section – picture of a flag, name/logo of facility, or other unique symbol 1 section – joker or other unique symbol These numbers/symbols must be arranged clockwise in a particular order outlined in regs. Each section must be covered with glass. Wheel must have a clapper that selects a section on conclusion of a spin.</p> <p>Layout must be submitted to and approved by the Bureau of Gaming Operations.</p> <p>58 Pa. Code 619a.1 (game rules section of regs)</p>		<p>23 sections - \$1 15 sections - \$2 8 sections - \$5 4 sections - \$10 2 sections - \$20 1 section – picture of a flag, name/logo of facility, or other unique symbol 1 section – joker or other unique symbol These numbers/symbols must be arranged clockwise in a particular order outlined in regs. Each section must be covered with glass. Wheel must have a clapper that selects a section on conclusion of a spin.</p> <p>COMAR 36.05.08.01 (game rules section of regs)</p>
Game Tables	<p>See NRS 463.0136 defining “associated equipment” as “any equipment...used remotely or directly in connection with gaming” and Regulations 14.260-280 regarding approval of associated equipment. Also see Regulation 12.100 Other Instrumentalities: Instruments used for gaming (other than chips and tokens) must be of such size, shape,</p>	<p>Regulations include (in the section of the regs dealing with game rules) general specifications related to size, shape, and layout of tables to be used for the following games:</p> <p>Blackjack - 13:69E-1.10 Three Card Poker - 13:69E-1.10a Spanish 21 - 13:69E-1.10b Blackjack Switch - 13:69E-</p>	<p>Regulations include (in the section of the regs dealing with game rules) general specifications related to size, shape, and layout of tables to be used for the following games:</p> <p>Flop Poker – 583.2 Pops and Hops – 585.1 Roulette – 617a.1 Big Six Wheel – 619a.1 Pai Gow – 621a.2</p>	<p>Table game layouts must be consistent with casino operator’s internal controls pursuant to OAC 3772-11-34.</p> <p>Specifications related to size, shape, and layout are also included in the table game rules published on individual casino websites.</p>	<p>Regulations include (in the section of the regs dealing with game rules) general specifications related to size, shape, and layout of tables to be used for the following games:</p> <p>Roulette – 36.05.07.01 Blackjack – 36.05.04.02 Craps and Mini-Craps – 36.05.05.02 Poker – 36.05.06.02</p>

	Nevada	New Jersey	Pennsylvania	Ohio	Maryland
	<p>and design and have such other specifications as the chairman may approve or require.</p> <p>See above re “associated equipment” regulations, 14.260-280, for approval process.</p>	<p>1.10c Craps and Mini-Craps - 13:69E-1.11 Baccarat and Minibaccarat - 13:69E-1.12 Big Six Wheel - 13:69E-1.13 Sic Bo - 13:69E-1.13a Pai Gow Poker - 13:69E-1.13b Pai Gow - 13:69E-1.13c Pokette - 13:69E-1.13d Poker - 13:69E-1.13e Double Down Stud - 13:69E-1.13f Caribbean Stud - 13:69E-1.13g Let IT Ride Poker - 13:69E-1.13h Mini-Dice - 13:69E-1.13i Fast Action Hold ‘Em - 13:69E-1.13j Casino War - 13:69E-1.13k Colorado Hold ‘Em Poker - 13:69E-1.13l Boston 5 Stud Poker - 13:69E-1.13m Double Cross Poker - 13:69E-1.13n Double Attack Blackjack - 13:69E-1.13o Four Card Poker - 13:69E-1.13p Texas Hold ‘Em Bonus Poker - 13:69E-1.13q Flop Poker - 13:69E-1.13r Two Card Joker Poker - 13:69E-1.13s Asia Poker - 13:69E-1.13t Ultimate Texas Hold ‘Em - 13:69E-1.13u Winner’s Pot Poker - 13:69E-1.13v</p>	<p>Craps and Mini-Craps – 623a.2 Sic Bo – 625a.1 Mini Baccarat – 627a.2 Midi Baccarat – 629a.2 Baccarat – 631a.2 Blackjack – 633a.2 Spanish 21 – 635a.2 Poker – 637a.2 Caribbean Stud Poker – 639a.2 Four Card Poker – 641a.2 Let IT Ride Poker – 643a.2 Pai Gow Poker – 645a.2 Texas Hold ‘Em Bonus Poker – 647a.2 Three Card Poker – 649a.2 Casino War – 651a.2 Ultimate Texas Hold ‘Em Poker – 653a.2 Mississippi Stud – 655a.2 Crazy Four Poker – 657a.2 Asia Poker – 659a.2 Three Dice Football – 661a.2 Five Card HI-LO – 663a.2 Double Attack Blackjack – 665a.2</p>		<p>Big Six Wheel – 36.05.08.01 Four Card Poker – 36.05.09.02 Midi Baccarat – 36.05.10.02 Mississippi Stud – 36.05.11.02 Pai Gow Poker – 36.05.12.02 Texas Hold ‘Em Bonus Poker – 36.05.13.02 Three Card Poker – 36.05.14.02 Pai Gow – 36.05.15.02 Ultimate Texas Hold ‘Em Poker – 36.05.16.02 Mini Baccarat – 36.05.17.02 Let IT Ride Poker – 36.05.18.02 Double Draw Poker – 36.05.19.02</p>

	Nevada	New Jersey	Pennsylvania	Ohio	Maryland
		Supreme Pai Gow - 13:69E-1.13w Mississippi Stud - 13:69E-1.13x Red Dog - 13:69E-1.14			



*Investigations and
Enforcement Bureau*

Mr. Chairman, Members of the Commission, I am here today with Senior Supervising Gaming Agent Burke Cain. Our task here today is to try and guide you through answering the questions posed by the legal department. Between Mr. Cain and myself we have 72 years of gaming regulatory experience to draw on for our recommendations:

- a. What will be the Commission's design specifications for value chips? **MGC will require certain design specifications for value chips. Design specifications will be submitted to and approved by IEB.** For example: Each value chip will have a primary color and a secondary color. Standard denomination colors (\$1= white, \$5= red). Each value chip shall have identifying features: 1) denomination express in numbers 2) name, logo of licensee 3) anti-counterfeiting measures for \$25 or more value chips 4) the word "Massachusetts" 5) primary color 6) anti-counterfeiting measure or design that is unique to the chip manufacturer. 7) edge spots: clearly visible on the edge, permanent, using primary/ secondary colors, or design, pattern, feature seen by CCTV. 8) approved secondary set of value chips
- b. How will the Commission distinguish among value chips and various types of non-value chips? **There may be Promotional chips, roulette chips, tournament chips and poker rake chips. All of these chips have prescribed regulatory requirements that will be reviewed with the licensee prior to use. IEB will approve these chips prior to use.**
- c. Will the Commission regulate gaming plaques? If so, what will be the Commission's design specifications and approval process? **Yes. Each plaque shall meet certain physical characteristics that are spelled out. The design specifications of the proposed gaming plaques shall be submitted to and approved by the IEB.**
- d. Will the Commission promulgate specific regulations for gaming instrumentalities other than chips (e.g., cards, dice, tiles, wheels)? **Yes. Cards, Dice, Tiles and Roulette wheels, Big Six Wheels, dealing shoes, roulette balls, among other things, will be subject to regulatory requirements regarding size, texture, weight, spot requirements, order of spots on dice, order of the numbers on the roulette wheel the or order of the dollar symbols on the Big Six wheel, for example.**



Massachusetts Gaming Commission

No Documents