



STATE OF NORTH DAKOTA  
**OFFICE OF ATTORNEY GENERAL**

[www.attorneygeneral.nd.gov](http://www.attorneygeneral.nd.gov)

(701) 328-2210

**Drew H. Wrigley**  
ATTORNEY GENERAL

**Senate Judiciary Committee**  
**House Bill No. 1416**

**Relating to two organizations conducting at the same site.**  
**April 1, 2025, Peace Garden Room**

My name is Deb McDaniel, I am the Director of Gaming for the Office of Attorney General. I am here in opposition to House Bill 1416 as amended.

Concerns we have for language on page no. 1, lines 20 through 22:

- “Two organizations may consent to conduct” – will documentation be required for consent and how soon and how often will that documentation need to be obtained prior to conduct?
- “two different types of games on the same day” – If “main” organization conducts twenty-one and e-tabs, does that “main” organization get to pick which game type they will be conducting while the other organization conducts its different game type? This language makes it sound like each organization is only able to conduct one game type at the same time as the other organization or is it saying that two organizations get to conduct two different game types at the same time? This is very confusing, and our office would not be able to regulate this.
- “at the same site for a period not to exceed twelve hours per day” – which twelve hours? Some sites are open over twelve hours. If open over twelve hours does the “main” organization get to conduct any other game type after that twelve-hour period is over?

Page no 2, lines 1 through 4.

- “The site is located in a city with a population of one thousand two hundred or less” – Our office does not understand why the population matters? Very large organizations can operate in small cities and counties as well as small organizations.
- “Each organization employs its own staff” - This is a must for regulation purposes but again how will this be regulated and verified?
- “Funds from gaming are not commingled” – Again, this is a must for regulation. Administrative rules for recordkeeping could be put in place. Local permit holders do not have recordkeeping requirements as they are locally regulated and do not report to the State.

As written our office would request a Do Not Pass for House Bill 1416.