

# GREY2K USA WORLDWIDE



## Directors

Christine A. Dorchak, Esq.  
*President*

Eric Jackson, *Vice President*  
*Greyhound Companions of*  
*New Mexico*

Sherry Mangold, *Treasurer*  
*Animal Protection of New Mexico*

Jay Kirkus, *Secretary*

Kelly Driscoll

Massimo Greco  
*Pet Levrieri*

Tom Grey  
*Stop Predatory Gambling*

Charmaine Settle

Carey M. Theil  
*Executive Director*

## Directors Emeritus

Dr. Jill Hopfenbeck, DVM  
Albano Martins, ANIMA  
Michael Trombley, CPA

## In Memoriam

Joyce Carta,  
*Greyhound Adoptions of Florida*  
Kevin Neuman, *KCREGAP*  
Kathy Pelton

*Organization listing are for*  
*identification purposes only*

February 5, 2025

Chair Diane Larson  
Senate Judiciary Committee  
North Dakota Legislative Council  
State Capitol  
600 East Boulevard Avenue  
Bismarck, ND 58505

RE: Testimony on Senate Bill 2347 and Senate Bill 2384

Dear Chair Larson,

On behalf of our more than 300,000 supporters, I would like to thank you for the opportunity to provide testimony on Senate Bills 2347 and 2384. I hope this information is helpful as you consider the merits of this legislation.

### About GREY2K USA Worldwide

Formed in 2001, GREY2K USA Worldwide is the largest greyhound protection group in the world. As a nonprofit organization we work to pass stronger greyhound protection laws and end dog racing. We also promote the rescue and adoption of greyhounds. We have a very narrow mission related to the protection of greyhounds and have no position on horse racing, other animal activities, or other gambling issues.

Our bipartisan campaigns have earned the support of conservative luminaries including Lara Trump, Congressman Zach Nunn, Senator Rick Scott, Governor Mike Huckabee, and Attorney General nominee Pam Bondi. Republicans and Democrats have been able to join together on this issue because it is underpinned by mainstream values regarding how we should treat dogs.

### Current status of greyhound racing in the U.S.

Greyhound races are currently held at two tracks in the United States: Wheeling Island and Tri-State Greyhound Track in West Virginia.<sup>i</sup>

Greyhound racing has declined dramatically over the past three decades. At its peak there were nearly 70 operational dog tracks in 19 states, and approximately \$3.5 billion wagered on greyhound races annually.<sup>ii</sup> Today, this number has been reduced to less than \$350 million nationwide, including \$60.7 million via the North Dakota Advance Deposit Wagering (ADW) hub system.<sup>iii</sup>

Greyhound racing is currently illegal in 43 states, including North Dakota.<sup>iv</sup> In 2018 Florida citizens voted to outlaw dog racing by a decisive vote of 69% to 31%.<sup>v</sup> A decade earlier, Massachusetts voters abolished greyhound racing by a tally of 56% to 44%.<sup>vi</sup> As a result of animal welfare concerns, state legislatures have recently outlawed greyhound racing in Connecticut (2024),<sup>vii</sup> Oregon (2022),<sup>viii</sup> Arizona (2016),<sup>ix</sup> Colorado (2014),<sup>x</sup> New Hampshire (2010),<sup>xi</sup> and Rhode Island (2010).<sup>xii</sup>

A federal bill to outlaw gambling on dog racing nationwide, the Greyhound Protection Act (H.R. 3894), earned 80 bipartisan co-sponsors in the 118<sup>th</sup> Congress.<sup>xiii</sup> The measure has been endorsed by more than 250 local animal shelters, animal welfare groups, anti-gambling organizations, and international NGOs.<sup>xiv</sup> The company that owns both West Virginia tracks, Delaware North, is neutral on H.R. 3894.<sup>xv</sup>

### North Dakota's role in propping up greyhound racing

Nearly half of dog race wagers are now made over the internet, via Advance Deposit Wagering (ADW) companies. North Dakota is one of only two states, with Oregon,<sup>xvi</sup> that allows internet gambling companies to process racetrack bets.<sup>xvii</sup> These gambling hubs operate under the dubious legal fiction that bets placed by gamblers wagering from outside North Dakota occur in North Dakota, because that is where the processing centers are located.<sup>xviii</sup> This theory is used to circumvent concerns regarding the Federal Wire Act prohibiting internet gambling on racing.

For many years, there has been tension over the legality of greyhound ADW betting as it relates to the Federal Wire Act and pari-mutuel wagering. The Interstate Horseracing Act was amended in 2000 to allow states to decide whether residents can make ADW bets on horse races from out-of-state operators, as long as ADW was legal in both states. However, it is important to note that the Interstate Horseracing Act applies to horse races only, and makes no reference to the legality of ADW bets on greyhound racing.

Internet gambling companies like US Off-Track electronically stream dog races on mobile apps so that people in states across the country may place bets. The North Dakota Racing Commission licenses out-of-state ADW companies, with the majority of ADW profits retained by these companies. North Dakota Racing Commission Executive Director Bruce Johnson told a legislator during a June 2024 Interim Judiciary Committee Hearing that less than 1% of bets placed on greyhound racing that are processed through the North Dakota hubs were from North Dakota residents.<sup>xix</sup>

In Fiscal Year 2023, \$60.7 million in ADW greyhound bets were processed in North Dakota, whereas over \$1 billion in horse bets were processed. Dog racing accounted for only 5% of all ADW bets processed in North Dakota, and the net tax generated is roughly \$240,000 per biennium.<sup>xx</sup> In 2022, 16% of all dog race wagers made in the United States were made over the internet via ADW companies licensed in North Dakota.

### Involvement of foreign dog tracks

Foreign dog tracks in Ireland, the United Kingdom, and Australia are using North Dakota ADW Hubs to facilitate bets from American gamblers.<sup>xxi</sup> In January 2021 British company Sports Information Services (SIS), in partnership with AmWest Entertainment, introduced a new service that allows American gamblers to wager on races at British and Irish dog tracks. The agreement covers 53 race meetings per week, and as many as 33,000 dog races annually. The races are offered every seven minutes between 1:30 PM and 4:30 PM EST, with a stated goal to "keep bettors engaged and drive betting revenue."<sup>xxii</sup> This new betting service coincided with the end of dog racing in Florida, and is intended to prop up greyhound racing in the United Kingdom and Ireland. These wagers are being processed in North Dakota.

Major animal welfare violations are occurring in these jurisdictions. For example, a 2019 RTÉ News investigation revealed that nearly 6,000 Irish greyhounds are killed each year, that the industry breeds 1,000% more puppies than necessary to sustain racing, and unwanted greyhounds are sometimes killed at slaughterhouses.<sup>xxiii</sup> At the same time, opposition to dog racing is surging across the world. Animal welfare advocates recently obtained more than 100,000 signatures on an official government petition in the British Parliament, triggering the first ever debate on whether greyhound racing should end.<sup>xxiv</sup> In May 2021, the British government included greater protections for greyhounds in its official agenda and Queen’s speech.<sup>xxv</sup> Similar efforts are underway in Wales<sup>xxvi</sup> and Scotland.<sup>xxvii</sup> And in December 2024, New Zealand Racing Minister Winston Peters announced his intention to phase out dog racing in that country by 2026.<sup>xxviii</sup>

### Alleged involvement of Mexican drug cartel associate

We were particularly concerned about the welfare of dogs at a racetrack in Tijuana, Mexico, named Agua Caliente before that dog track closed in July 2024.<sup>xxix</sup> There were no animal welfare standards at Caliente, and the facility was one of the worst dog tracks in the world. Several companies, including US-Off Track, were using the North Dakota hubs to process wagers on races from Caliente prior to its closure. We can confirm that dogs there regularly competed with fewer rest days than at American dog tracks.<sup>xxx</sup> This likely led to higher injury rates, although Caliente did not provide the public with any data on greyhound injuries or deaths.

The owner of Caliente, Jorge Hank Rhon, has been linked to organized crime and the trafficking of endangered wildlife. Rhon “has been suspected by U.S. law enforcement and Mexican authorities of illegal money laundering activities related to illicit drug trafficking, particularly with the Arellano Felix drug cartel.”<sup>xxxi</sup> He was arrested and detained by the federal government in 2011 after 88 guns were found at his home, including a firearm that was linked to a murder.<sup>xxxii</sup> The Governor of Baja, MX described Rhon as the head of a “criminal group” and quoted a former governor as saying, “All roads lead to the racecourse.” He accused Rhon of being personally responsible for the high crime rate in his state.<sup>xxxiii</sup> In 1991 Rhon was fined \$25,000 after an associate attempted to cross the US border with an endangered White Siberian Tiger cub that apparently had been born at his private zoo.<sup>xxxiv</sup> Similarly, in 1995 Rhon was arrested at a Mexican airport after customs officials searched him and discovered a trove of animal skins and ivory from endangered species.<sup>xxxv</sup>

### Animal welfare concerns

Greyhound racing is cruel and inhumane. Profitability is prioritized over animal welfare, and dogs are subjected to standard practices that are designed to cut costs and increase the profit margin for each individual animal. Documented animal welfare concerns include:

- At commercial racetracks hundreds of greyhounds are kept inside warehouse-style kennels in rows of stacked cages that are barely large enough for them to stand up or turn around. According to industry statements, greyhounds are kept confined in their cages for 20 to 23 hours per day, with shredded paper or carpet remnants as bedding.<sup>xxxvi</sup>
- Greyhounds suffer serious injuries. Per the Oregon Racing Commission, more than 10,000 greyhounds were injured in 2023 at dog tracks that are using the Oregon ADW betting system.<sup>xxxvii</sup> In 2023, 568 greyhound injuries were reported at the two dog tracks in West Virginia alone, including 181 dogs that suffered broken bones and nine dogs that died.<sup>xxxviii</sup>

- Since 2020 four cases of “live lure training” have been documented in Oklahoma, Kansas, Texas, and Colorado. This cruel practice involves the use of small animals to excite and enhance a chase instinct in greyhounds. Typically, screaming animals are dangled before greyhounds, dragged in front of them on ropes, or simply set loose to be attacked.<sup>xxxix</sup>
- Female greyhounds are routinely given doses of a dangerous anabolic steroid, methyltestosterone, to prevent a loss of race days.<sup>xi</sup> Also, greyhounds have repeatedly tested positive for cocaine at racetracks in multiple states.<sup>xli</sup>
- Greyhounds have short racing careers, and are usually discarded before their fourth birthday. Historically a large number of greyhounds were killed when they were no longer profitable, and as recently as 2009 the National Greyhound Association estimated that 2,000 to 3,000 greyhounds were killed annually. Thankfully, fewer greyhounds are killed today, due to a contraction of the industry and increased emphasis on adoption.<sup>xlii</sup>

#### North Dakota voters oppose gambling on greyhound racing

Polling conducted in 2023 by Thirty-Ninth Street Strategies found that 71% of North Dakotans oppose allowing foreign dog tracks use North Dakota to process dog bets. 75% of North Dakotans were more likely to oppose processing dog bets after hearing that North Dakota was processing bets from a Mexican dog track owned by a controversial figure with alleged ties to drug cartels. After hearing pro and con messaging, opposition rose to 75%, including 72% of Republicans.

#### ADW companies cannot simply move to another state

The Fiscal Notes on SB 2347 and SB 2384 raise the concern that ADW companies offering greyhound betting could move to another state. This concern is misplaced. There is only one other state, Oregon, that licenses ADW hubs. The Oregon legislature is currently considering legislation (HB 3020) to prohibit greyhound wagering, including the processing of greyhound ADW bets. That bill has been introduced at the request of Governor Tina Kotek, for the Oregon Racing Commission, and has broad support.

#### The small impact on the Racing Commission budget can be mitigated by phasing out greyhound betting

As the practice of greyhound racing is dying, it is not a sustainable funding source for horse racing or the Racing Commission. Greyhound bets are not a significant revenue source for the state, and removing greyhound betting will result in a reduction to the General Fund and Horsemen’s Funds each biennium of only \$290,000. This impact can be mitigated by including a two-year phase period out of greyhound betting, which we support. In states where greyhound betting has ended, some simulcast dollars have migrated to horse racing, to the benefit of the equine industry.

In closing, this is an important provision that will help thousands of greyhounds around the world. Dog racing is cruel and inhumane, and goes against our values as Americans.

Respectfully,



Carey M. Theil  
Executive Director

# What is “Advance Deposit Wagering” on greyhound racing?



## FOREIGN DOG RACES

Greyhounds race at foreign race courses.



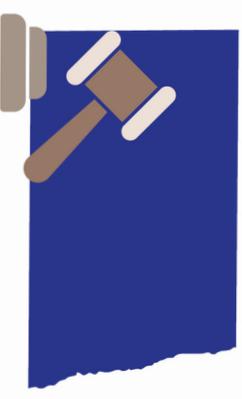
## CRUELTY

Greyhounds suffer at foreign dog tracks, enduring lives of confinement and suffering serious injuries.



## INTERNET BETS

Internet gambling companies like US Off-Track electronically stream dog races on mobile apps and let people in fewer than twenty states place bets.



## NORTH DAKOTA'S ROLE

Because internet bets on dog races are legally suspect under federal law, internet gambling companies process them in North Dakota, under the legal theory that they occur there.



NORTH  
**Dakota** | Racing Commission  
Be Legendary.™

**COLLOSSUS**

watch **and** **wager**

**Channel**  
GREYHOUND CHANNEL

**SKY**  
RACING  
WORLD

**HEBET**

**FARI**  
BET  
Furber's Kentucky Industry Student Equinecare

## RACING COMMISSION

The North Dakota Racing Commission licenses out-of-state Advance Deposit Wagering companies.



## WHO PROFITS?

The vast majority of the profits from ADW betting on greyhound races is retained by internet gambling companies.

- <sup>i</sup> TrackInfo, <https://www.trackinfo.com/> (accessed January 17, 2025).
- <sup>ii</sup> Strauss, Duncan, "Greyhound races are a thing of the past. Here's why Florida still hasn't learned that.," *Jacksonville.com*, June 16, 2017, <https://www.jacksonville.com/story/news/nation-world/2017/06/16/greyhound-races-are-thing-past-here-s-why-florida-still-hasn-t-learned/15759782007/> (accessed January 17, 2025).
- <sup>iii</sup> Pittman, Craig, "The era of greyhound racing in the U.S. is coming to an end," *National Geographic*, October 1, 2020, <https://www.nationalgeographic.com/animals/article/greyhound-racing-decline-united-states> (accessed January 17, 2025).
- <sup>iv</sup> "Greyhound Advocates Outlaw Gov. Ned Lamont for Signing Bill to Outlaw Dog Racing," *PR Newswire*, May 9, 2024, <https://www.prnewswire.com/news-releases/greyhound-advocates-applaud-gov-ned-lamont-for-signing-bill-to-outlaw-dog-racing-302141798.html> (accessed January 17, 2025).
- <sup>v</sup> Diaz, George and Santich, Kate, "Greyhound racing Amendment 13 passes in Florida, phasing out sport by 2020," *Orlando Sentinel*, November 6, 2018, <https://www.orlandosentinel.com/opinion/os-ae-greyhound-racing-amendment-13-vote-20181106-story.html> (accessed January 17, 2025).
- <sup>vi</sup> Ebbert, Stephanie, "Mass. Voters approve dog racing ban," *The Boston Globe*, November 4, 2008, <https://files.grey2kusa.org/pdf/11-05-08-BostonGlobe.pdf> (accessed January 17, 2025).
- <sup>vii</sup> "Dog Racing Now Officially Illegal in Connecticut," *Connecticut Senate Democrats*, October 4, 2024, <https://www.senatedems.ct.gov/dog-racing-now-officially-illegal-in-connecticut> (accessed January 17, 2025).
- <sup>viii</sup> Stites, Sam, Drake, Lauren and VanderHart, Dirk, "Oregon lawmakers say goodbye to Senate President Peter Courtney and slow toward a finish," *OPB*, March 3, 2022, <https://www.opb.org/article/2022/03/03/oregon-legislature-senate-president-peter-courtney-retiring/> (accessed January 17, 2025).
- <sup>ix</sup> "Ducey signs bill ending Arizona's live dog racing," *Your West Valley*, May 13, 2016, [https://files.grey2kusa.org/pdf/2016.05.13>Your\\_West\\_Valley.pdf](https://files.grey2kusa.org/pdf/2016.05.13>Your_West_Valley.pdf) (accessed January 17, 2025).
- <sup>x</sup> The Associated Press, "Greyhound racing ban signed into law in Colorado," *The Denver Post*, March 10, 2014, <https://www.denverpost.com/2014/03/10/greyhound-racing-ban-signed-into-law-in-colorado/> (accessed January 17, 2025).
- <sup>xi</sup> "Statement by GREY2K USA on the Signing of House Bill 630 by Governor John Lynch and the End of Greyhound Racing," *GREY2K USA*, July 8, 2010, <https://www.prnewswire.com/news-releases/statement-by-grey2k-usa-on-the-signing-of-house-bill-630-by-governor-john-lynch-and-the-end-of-greyhound-racing-98037069.html> (accessed January 17, 2025).
- <sup>xii</sup> "Greyhound racing in New England ends with RI bill," *The Associated Press*, May 14, 2010, [http://archive.boston.com/news/local/vermont/articles/2010/05/14/greyhound\\_racing\\_in\\_new\\_england\\_ends\\_with\\_ri\\_bill/](http://archive.boston.com/news/local/vermont/articles/2010/05/14/greyhound_racing_in_new_england_ends_with_ri_bill/) (accessed January 17, 2025).
- <sup>xiii</sup> "H.R. 3894 – Greyhound Protection Act of 2023," *Congress.gov*, <https://www.congress.gov/bills/118th-congress/house-bill/3894> (accessed January 17, 2025).
- <sup>xiv</sup> "The Greyhound Protection Act," <https://files.grey2kusa.org/pdf/Greyhound-Protection-Act-Endorsements.pdf> (accessed January 17, 2025).
- <sup>xv</sup> The correspondence reads, in part, "In West Virginia, we have demonstrated our intention not to become involved in or seek to influence, on way or another, legislative efforts to end greyhound racing – as long as they preserve our licenses to own and operate the Wheeling Island and Mardi Gras casinos. As to a federal effort to phase out greyhound racing, we will remain neutral" (Hansberry, Brian, "Letter from Brian Hansberry to Christine A. Dorchak, Esq. and Wayne Pacelle," *Delaware North*, March 9, 2021).
- <sup>xvi</sup> "Advance Deposit Wagering," *Oregon Racing Commission*, <https://www.oregon.gov/racing/Pages/Advance-Deposit-Wagering.aspx> (accessed January 17, 2025).
- <sup>xvii</sup> "Licenses," *North Dakota Racing Commission*, <https://www.racingcommission.nd.gov/licenses> (accessed January 17, 2025).
- <sup>xviii</sup> According to [OAR 462-220-0060](https://www.oregon.gov/racing/Pages/Advance-Deposit-Wagering.aspx), ADW companies are operating under the legal theory that these bets are "considered to have been made in the state of Oregon" (OAR 462-220-0060, "Where the Wager is Considered to Have Been Made," *Oregon Secretary of State*, <https://secure.sos.state.or.us/oard/viewSingleRule.action?ruleVrsnRsn=133474> (accessed January 17, 2025).
- <sup>xix</sup> Achterling, Michael, "Animal advocacy group hopes dog race betting is on its last legs in North Dakota," *North Dakota Monitor*, June 24, 2024, <https://northdakotamonitor.com/2024/06/24/animal-advocacy-group-hopes-dog-race-betting-is-on-its-last-legs-in-north-dakota/> (accessed January 17, 2025).
- <sup>xx</sup> Data provided by the North Dakota Racing Commission to GREY2K USA Worldwide, gratefully acknowledged.
- <sup>xxi</sup> "Licenses," *North Dakota Racing Commission*, <https://www.racingcommission.nd.gov/licenses> (accessed January 17, 2025).
- <sup>xxii</sup> "New SIS World Greyhound Tote Pool," *SIS*.
- <sup>xxiii</sup> Ryan, Conor, "Thousands of greyhounds 'culled each year' for not being fast enough," *RTE*, June 26, 2019, <https://www.rte.ie/news/ireland/2019/06/26/1057535-greyhound-rte-investigates/> (accessed January 17, 2025).
- <sup>xxiv</sup> "Ban greyhound racing to end unnecessary deaths & suffering of racing dogs," *UK Government and Parliament*, <https://petition.parliament.uk/petitions/554073> (accessed January 17, 2025).
- <sup>xxv</sup> "Our Action Plan For Animal Welfare," *Department for Environment Food & Rural Affairs*, p. 16, [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/985332/Action\\_Plan\\_for\\_Animal\\_Welfare.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/985332/Action_Plan_for_Animal_Welfare.pdf) (accessed January 17, 2025).
- <sup>xxvi</sup> Langstaffe, Joe, "Greyhound racing should be banned in Wales, says committee," *BBC*, December 15, 2022, <https://www.bbc.com/news/uk-wales-63976802> (accessed January 17, 2025).
- <sup>xxvii</sup> "Proposed Prohibition of Greyhound Racing (Scotland) Bill," *Scottish Parliament*, February 8, 2024, <https://www.parliament.scot/-/media/files/legislation/proposed-members-bills/mark-ruskell-consultation-document.pdf> (accessed January 17, 2025).
- <sup>xxviii</sup> Corlett, Eva, "New Zealand plans to ban greyhound racing over animal welfare concerns," *The Guardian*, December 9, 2024, <https://www.theguardian.com/world/2024/dec/10/new-zealand-greyhound-racing-ban-plan-winston-peters-ntwnfb> (accessed January 17, 2025).
- <sup>xxix</sup> Plante, Dan, "Nearly 200 greyhounds rescued after Tijuana dog racing track closes," *Fox 5 San Diego*, August 2, 2024, <https://fox5sandiego.com/video/nearly-200-greyhounds-rescued-after-tijuana-dog-racing-track-closes/9920847/> (accessed January 17, 2025).
- <sup>xxx</sup> "Caliente," *TrackInfo*, <http://www.trackinfo.com/tracksinfo.jsp?raceid=13&GCA%24&racedate=2021-02-10> (accessed January 17, 2025).
- <sup>xxxi</sup> Kristine Hamann, State Inspector General, "Report To The Governor On The Integrity Of Those Seeking To Operate The Racetracks At Aqueeduct, Belmont Park and Saratoga," *State Of New York Office Of The Inspector General*, June 1, 2007, <https://yonkerstribune.typepad.com/files/report-to-the-governor-on-the-integrity-of-those-seeking-to-operate-the-racetracks-at-aqueeduct-belmont-park-and-saratoga.pdf> (accessed January 17, 2025).
- <sup>xxxii</sup> Marosi, Richard, "Ex-mayor of Tijuana Jorge Hank Rhon arrested," *Los Angeles Times*, June 5, 2011, <https://www.latimes.com/archives/la-xpm-2011-jun-05-la-fg-mexico-rhon-20110605-story.html> (accessed January 17, 2025); Dibble, Sandra, "Feds: Guns seized at home of ex-TJ mayor tied to homicides," *Chicago Tribune*, June 10, 2011; Malkin, Elisabeth "Ex-Mayor Of Tijuana Investigated In Killing," *The New York Times*, June 14, 2011, <https://www.nytimes.com/2011/06/15/world/americas/15mexico.html> (accessed January 17, 2025).
- <sup>xxxiii</sup> Gallego, Erika, "Bonilla blames Hank for threats against him; he links him to the CJNG," *La Voz De La Frontera*, April 2, 2021, [https://oem-com.mx.translate.goog/lavozdelafrontera/local/culpa-bonilla-a-hank-de-amenazas-en-su-contral-lo-liga-al-cine-17371148?x\\_tr\\_sl=es&x\\_tr\\_tl=en&x\\_tr\\_hl=en&x\\_tr\\_pto=sc&x\\_tr\\_hist=true](https://oem-com.mx.translate.goog/lavozdelafrontera/local/culpa-bonilla-a-hank-de-amenazas-en-su-contral-lo-liga-al-cine-17371148?x_tr_sl=es&x_tr_tl=en&x_tr_hl=en&x_tr_pto=sc&x_tr_hist=true) (accessed January 17, 2025).
- <sup>xxxiv</sup> Matthew, Neal, "Jorge Hank Rhon, Caliente racetrack owner, owned nine pet shops, six veterinary clinics," *San Diego Reader*, November 27, 1991; Kun, Josh, "The Island of Jorge Hank Rhon," *LA Weekly*, February 15, 2006, <https://www.laweekly.com/the-island-of-jorge-hank-rhon/> (accessed January 17, 2025).
- <sup>xxxv</sup> Bergman, Lowell, "Family Tree – The Hanks," *PBS Frontline*, 2010, <https://www.pbs.org/wgbh/pages/frontline/shows/mexico/family/bergman.html> (accessed January 17, 2025).
- <sup>xxxvi</sup> Florida Department of Business and Professional Regulation, Division of Pari-Mutuel Wagering, Investigative Report for Case No. 2006029115 (Tallahassee, FL: July 20, 2006).
- <sup>xxxvii</sup> Achterling, Michael, "Animal advocacy group hopes dog race betting is on its last legs in North Dakota," *North Dakota Monitor*, June 24, 2024, <https://northdakotamonitor.com/2024/06/24/animal-advocacy-group-hopes-dog-race-betting-is-on-its-last-legs-in-north-dakota/> (accessed January 17, 2025).
- <sup>xxxviii</sup> Dr. Lori Bohenko, Wheeling Island Racetrack Veterinary Report, (Charleston WV: West Virginia Racing Commission, 2022); Dr. Mark D. Webster, Veterinary emergencies, scratches, and racers inactivated due to track injuries at Mardi Gras Casino & Resort (Charleston WV: West Virginia Racing Commission, 2022); analysis by GREY2K USA Worldwide.
- <sup>xxxix</sup> Defede, Jim, "A Culture Of Cruelty: An Exclusive Look Inside The Secret World Of Greyhound Training," *CBS Miami*, July 26, 2020; Tabachnik, Sam, "Weld county greyhound 19 breeders under investigation for alleged animal cruelty," *Denver Post*, July 19, 2021, <https://www.denverpost.com/2021/07/19/greyhound-racing-lashmet-farm-live-lure-training/> (accessed January 17, 2025).
- <sup>xl</sup> Linda L. Blythe et al., Care of the Racing and Retired Greyhound.
- <sup>xli</sup> Florida Department of Business and Professional Regulation, Division of Pari-Mutuel Wagering v. Malcolm McAllister, Final Order, Case #: 2017005955, 2017007251, 2017007266, 2017007333, 2017007349, 2017007373, Florida, April 26, 2017; Florida Department of Business and Professional Regulation, Division of Pari-Mutuel Wagering v. Charles F. McClellan, Administrative Complaint, Case #: 2017004271, Florida, February 6, 2017; Florida Department of Business and Professional Regulation, Division of Pari-Mutuel Wagering v. Charles F. McClellan, Order of Emergency Suspension of License, Case #: 2017015413, 2017015397, 2017015390, 2017017907, 2017017896, 2017017835, 2017017938, 2017022299, 2017022306, 2017022320, 2017022331, 2017022547, 2017022552, 2017022577, 2017024143, 2017024143, 2017024154, Florida, June 9, 2017; Florida Department of Business and Professional Regulation, Division of Pari-Mutuel Wagering v. Natasha L. Nemeth, Order of Emergency Suspension of License, Case #: 2016053887, 2017025755, 2017027351, 2017027362, 2017027380, 2017036121, Florida, July 28, 2017.
- <sup>xlii</sup> National Greyhound Association, as cited in; David Ono, "Guam Greyhounds get fresh start in L.A.," *KABC Channel 7 TV News*, February 20, 2009, <http://abc7.com/archive/6670382/> (accessed January 17, 2025)