

**2025 SENATE JUDICIARY**

**SB 2384**

# 2025 SENATE STANDING COMMITTEE MINUTES

## Judiciary Committee

Peace Garden Room, State Capitol

SB 2384

2/5/2025

Relating to the authorized sale of electronic gaming devices by manufacturers and live or simulcast horse racing.

2:31 p.m. Chair Larson opened the hearing.

Members present:

Chair Larson, Vice Chairman Paulson, Senators: Castaneda, Cory, Luick, Myrdal, Braunberger.

### Discussion Topics:

- Protecting equipment
- Serial numbers
- Contracts with manufacturers
- Gaming stamp
- Distributors
- Background checks

2:31 p.m. Senator Cory introduced the bill and submitted testimony in favor #35374.

2:37 p.m. Carey Theil, Executive Grey2K USA, testified in favor and submitted testimony #34498.

2:38 p.m. Willaim Kalanek, Lobbyist for Charitable Gaming Assoc. of ND, testified in opposition and submitted testimony #35017.

2:45 p.m. Scott Meske, Lobbyist for ND Gaming Alliance, testified in opposition.

2:48 p.m. Bruce Murry, Lobbyist for Fargo ND, testified in opposition.

2:48 p.m. Richelle Iverson, Gaming Manager at Fraser, Ltd., testified in opposition.

2:54 p.m. Brandi Arbach testified in opposition.

2:57 p.m. Bruce Johnson, Executive Director Racing Commission, testified in opposition.

2:59 p.m. Joe Griffin, American Legion, testified in opposition.

2:59 p.m. Leigh Lockhouse, NDHP, testified in opposition.

3:04 p.m. Greg Ballsnus, Lead Customer Service Rep from FPN Gaming, testified in opposition and submitted testimony #34740.

3:07 p.m. William Garrett, Owner of Northland Gaming, testified in opposition and submitted testimony #35274.

3:10 p.m. Robert Harms, Partner in Western Distributing, testified in opposition and submitted testimony #35473.

3:18 p.m. James Petty, State Steward of ND Horse Racing, testified in opposition.

3:19 p.m. Leslie F. Csokasy, Director of the National Greyhound Association, testified in opposition and submitted testimony #34260.

3:23 p.m. James Gartland, Executive Director National Greyhound Association, testified in opposition and submitted testimony #34644.

3:25 p.m. Michael A. Weiss, President of PariBet LLC, testified in opposition and submitted testimony #34710.

3:30 p.m. Edward Comins, President, Watch and Wager, testified in opposition and submitted testimony #34918.

3:33 p.m. Deb McDaniel, Director Charitable Gaming Division of Attorney Generals office, testified as neutral.

**Additional written testimony:**

Ian A. Bach, Regional General Manager of Diamond Game Enterprises, submitted testimony in opposition #34538.

Alfred DeLeon, President, Creative Game Technologies, LLC., submitted testimony in opposition #34648 and #34649.

Chad Cringer, COO of Creative Game Technologies, LLC., submitted testimony in opposition #34661.

Lorilee Goodall, Director/Business Development, submitted testimony in opposition #34677.

Abhinay Bhagavatula submitted testimony in opposition #34754.

Nelson Clemmens, Founder & CEO of AmWest Entertainment LLC, submitted testimony in opposition #34765.

Janelle Mitzel, Development Homes, Inc., submitted testimony in opposition #34780.

Don Santer, CEO of NDAD, submitted testimony in opposition #34994.

Lonnie G. Bertsch, Executive Director at ABATE of ND, submitted testimony in opposition #35334.

Joe Hoffert, Owner/ Partner of Western Distributing Company, submitted testimony in opposition #35375.

Lonna J. Street, Chairwoman of Spirit Lake Tribe, submitted testimony in opposition #35472.

Rikki Iverson, Gaming Manager of Fraser LTD., submitted testimony in opposition #35525.

Mark Jorritsma, Executive Director of ND Family Alliance Legislative Action, submitted testimony as neutral #34231.

3:45 p.m. Chair Larson closed the hearing.

*Kendra McCann, Committee Clerk*





### **Neutral Testimony for Senate Bill 2384**

Mark Jorritsma, Executive Director  
North Dakota Family Alliance Legislative Action  
February 5, 2025

Dear Madam Chair Larson and honorable members of the Senate Judiciary Committee,

North Dakota Family Alliance Legislative Action would like to render neutral testimony on Senate Bill 2384.

Our organization is opposed to gambling, due to its detrimental effect on families, but we appreciate that this bill would amend our Century Code to remove wagering on dog racing and recognize that is a step in the right direction for our state.

There is a nationwide effort to eliminate dog racing through the Greyhound Protection Act<sup>1</sup>. The cruelty suffered by greyhounds around the world is well documented.<sup>2</sup> When greyhounds are not racing around the track, they spend the vast majority of their day confined to small dirty cages. They often are denied veterinary care when they do suffer injuries or trauma. Since dogs are much more inexpensive than racehorses, they are considered easily replaced and little to no financial investment is put into their care. Racehorses are on the opposite end of the spectrum, are quite expensive and therefore receive the highest level of care from their owners who want to protect their hefty investments.

While North Dakota Family Alliance Legislative Action opposes wagering in general, we do appreciate that this bill removes simulcast dog racing from the statute and further specifies that bets or wagers on dog races may not be offered. For this reason, we are testifying in a neutral position on Senate Bill 2384.

Thank you for the opportunity to provide this testimony, and feel free to contact us if you have any questions.

Sincerely,

Mark Jorritsma  
Executive Director  
North Dakota Family Alliance Legislative Action

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<sup>1</sup><https://files.grey2kusa.org/pdf/GPA-Fact-Sheet.pdf>

<sup>2</sup><https://www.grey2kusa.org/about/issues.php>

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**February 1, 2025**

**Dear Members of the North Dakota Senate Judiciary Committee,**

Thank you for the opportunity to present my testimony in opposition to **SB2347 and SB2384**. As a **board director of the National Greyhound Association (NGA)**, a **farm inspector**, and an **adoption advocate**, I have dedicated over **25 years** as a **certified trainer and canine behavior consultant**, working directly with more than **15,000 dogs**. My career has been devoted to ensuring the highest standards of canine welfare, and I urge you to vote **no** on these bills.

#### **The Greyhound Industry's Commitment to Welfare**

The **National Greyhound Association** has safeguarded the **registry and welfare** of U.S. racing greyhounds for over **119 years**. Greyhound racing operates under **strict state regulations**, ensuring the well-being of these dogs through rigorous oversight.

#### **Injuries & Safety**

Despite misconceptions, greyhound racing maintains an **exceptionally low injury rate**, with **99.5% of individual race starts occurring without incident**. When injuries do occur, they are typically **minor**, and dogs are carefully rehabilitated before returning to racing—only after **state-employed veterinarians clear them**. Greyhounds that sustain more serious injuries, or age out of racing, are placed in adoption programs. We have very few fatalities and those are directed by the veterinarian. In 2023, there were 10 fatalities in total. Moreover, **racing surfaces are regularly monitored and adjusted** to maximize safety, recognizing that, like all athletes, greyhounds are not immune to injuries.

#### **Adoption & Life After Racing**

Unlike dogs suffering from **abuse or neglect**, retired greyhounds **transition smoothly into pet homes**, thanks to their **extensive socialization and structured upbringing**. The U.S. greyhound racing industry has successfully adjusted breeding practices, ensuring that every dog—whether they choose not to race or sustain an injury—finds a **home through accredited adoption programs**. As a result, **retired greyhounds enjoy a 100% adoption rate**.

#### **Strict Regulations Against Misconduct**

The NGA maintains **zero tolerance** for neglect or abuse. Any individual failing to meet our strict standards is **permanently removed from the industry**. While bad actors exist in every field, we have become **highly effective at identifying and addressing them before they pose any risk to our dogs**. The racing industry also adheres to state/jurisdiction mandated conduct codes including urine testing to uncover any prohibitive substances.

## Greyhound Racing & North Dakota's Economy

Greyhound wagering contributes significantly to **North Dakota's economy**. In the past two years, **ND Advanced Deposit Wagering (ADW) platforms** have processed approximately **\$60 million annually** in greyhound race wagers. In **fiscal year 2024 alone**, this figure grew to **\$67 million—an 11% increase**.

The **tax revenue generated from greyhound wagering** is distributed among four key funds:

- **Racing Commission**
- **Horse Breeders Fund**
- **Promotional Fund for race meets**
- **General Operating Fund**

While **greyhound wagering may not be the largest contributor**, every **dollar invested in racing creates a substantial economic impact**. A **2016 study by North Dakota State University** found that for every **\$1 generated by the racing industry**, **\$5.20 is reinvested back into the state's economy**.

The **North Dakota Racing Commission (NDRC)** receives **\$380,000 annually** from the general fund. Of this, the **\$87,000 tax revenue from greyhound wagering** directly supports race meets. This **\$87,000 investment generates over \$450,000 annually**, with **77% of purses remaining in North Dakota—an economic boost of approximately \$350,000 directly benefiting local racing communities**.

## North Dakota's Passive Income Model & The Risks of Expansion

North Dakota maintains a **conservative stance on gambling**, allowing the state to benefit from **passive income derived through ADWs national and global reach**—without expanding access to gambling for residents. *Banning greyhound wagering **will not reduce gambling participation** but will remove a valued **source of revenue supporting local industries**.*

However, the introduction of **Historical Horse Racing (HHR) machines in local facilities** would actively expand gambling within communities—something SB2347 and SB2384 fail to acknowledge.

## **Conclusion: Vote NO on SB2347 & SB2384**

Eliminating greyhound wagering would:

- ✗ **Harm North Dakota's racing industry**
- ✗ **Reduce economic benefits and tax revenue**
- ✗ **Punish an industry that upholds transparency, responsibility, and animal welfare**

I urge you to **vote NO on SB2347 and SB2384** to protect North Dakota's economy and its longstanding relationship with the greyhound racing industry.

Thank you for your time and consideration.

Sincerely,

*Leslie F Csokasy*

**Leslie Csokasy, CDBC, CPDT-KA, FFCP**

Board Director, National Greyhound Association

Certified Canine Behavior Consultant & Professional Dog Trainer, Fear Free Certified Professional

# 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

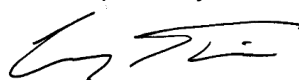
The Fiscal Notes on SB 2347 and SB 2384 raise the concern that ADW companies offering greyhound betting could move to another state. This concern is misplaced. There is only one other state, Oregon, that licenses ADW hubs. The Oregon legislature is currently considering legislation (HB 3020) to prohibit 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.



## RACING COMMISSON

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 Applaud 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.greyl2kusa.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.greyl2kusa.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-greyl2k-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.greyl2kusa.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> "Licensees," *North Dakota Racing Commission*, <https://www.racingcommission.nd.gov/licensees> (accessed January 17, 2025).
- <sup>xviii</sup> According to *OAR 462-220-0060*, 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> "Licensees," *North Dakota Racing Commission*, <https://www.racingcommission.nd.gov/licensees> (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/2019/0626/1057535-greyhound-rte-investigates/> (accessed January 17, 2025).
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January 29, 2025

Senate Judiciary Committee  
State Capitol  
Bismarck, ND 58505

SB 2384----Do Not Pass

Dear Mr. Chairwoman Larson and members of the Committee,

My name is Bill Breslo and I am the President of Diamond Game. We are a manufacturer of gaming equipment, with headquarters in Chatsworth, California. We have been doing business successfully in North Dakota since 2018.

We ask you to OPPOSE and vote DO NOT PASS on SB 2384.

The same bill was withdrawn in the House a few days ago and is being pursued by ONE manufacturer in North Dakota, in an effort to gain market share. The bill is not supported by the charities, other manufacturers, nor the gaming distributors in North Dakota. It should be defeated, because it represents bad policy for North Dakota. The current model (manufacturer to distributor to charitable organization) in North Dakota has worked successfully for decades. The distributors have invested in North Dakota for years, building businesses and contributing to the communities in which they are located. SB 2384 will severely harm and may put out of business, many of the North Dakota distributors.

SB 2384 diminishes competition and will promote consolidation of gaming by reducing the number of companies involved in the business. Competition will be stifled by impeding small manufacturers from entering the North Dakota market because they will have few if any distributors to help them introduce new products to North Dakota.

Please vote for Do NOT Pass on SB 2384.

Sincerely,

Bill Breslo

President



*Established 1906*

February 5, 2025

Chairman Larson, Members of the Committee;

My name is Jim Gartland, I am the Executive Director of the National Greyhound Association (NGA) in Abilene, KS. We are the official registry of all racing greyhounds in North America. We are a membership organization devoted to overseeing the recording of the breeding, whelping, registration and performance of all racing greyhounds on the continent. As greyhound experts and industry professionals, the NGA is devoted to the welfare and stewardship of the majestic greyhound breed.

On behalf of the National Greyhound Association membership and racing fans across the United States, we respectfully urge you to oppose SB2384 which, among other things, bans wagering on simulcast greyhound racing. Like many forms of gambling, wagering has moved to online platforms and in small business off track betting establishments. These wagers assist in offsetting general funds and governmental regulatory commissions as well as provides purse monies for horse racing, among other things. This bill would eliminate wagering on a single parimutuel activity that doesn't even occur within the state of North Dakota. Racing elsewhere in the country is heavily regulated by individual state commissions and operates with transparency to protect the racing animals and the integrity of the sport.

Senate Bill 2384 is obviously influenced by animal rights activists and their far right agendas. This bill would help to destroy the greyhound industry putting thousands of dedicated people out of work including greyhound farmers, trainers and kennel operators as well as track employees and associated businesses like veterinarians, feed and equipment suppliers and other entities. It would also bring a sad end to a breed of dog who's lineage can be traced back thousands of years.

Animal rights is a movement threatening the very heart of animal ownership and should be watched very carefully. Animal rights and their advocates believe the ideology that "there is no distinction between animals and humans." They view animal ownership as exploitation and slavery. The true goal of Animal Rights

Groups such as PETA, and Grey2K is to work for legislation and humane care "until all animals are no longer owned or utilized by human beings." The massive quantities of money raised by these groups is used primarily for salaries, fundraising and lobbying efforts with very little (usually about 2%) actually going to the animals themselves.

You have heard/will hear testimony today that is the same, tireless fabrications and rhetoric that have been espoused by these groups for over thirty years. These lies have been directed at our industry in particular because we are "the low hanging fruit" at the moment, but believe me, we are just the first in line of many to come including horse racing, rodeos, and any other animal related industries.

We ask that you take the time to look beyond the lies and innuendo and see the truth about greyhound racing and the tremendous strides this industry has made through the years. We ask for your support in defeating this bill and are available at any time to answer any questions you might have.

Jim Gartland

Executive Director, National Greyhound Association



February 3, 2025

The Honorable Diane Larson  
2525 Larson Road  
Bismarck, ND 58504-8926  
dlarson@ndlegis.gov  
*Sent Via Email*

**RE: Opposition to Senate Bill 2384**

Dear Senator Larson,

I'm writing to strongly urge you to oppose Senate Bill 2384. My name is Alfred DeLeon, president of Creative Game Technologies, LLC (CGT), a North Dakota-licensed manufacturer of electronic pull tab devices based in Columbus, Ohio.

Since 2017, CGT has been actively involved in North Dakota's electronic charitable gaming industry and supported the "distribution-only" model established in the original legislation and rules. As a small, family-owned business, we understand the critical role local distributors play in the community. Distributors like FPN, Plains Gaming, IF LaFleur & Sons, Charitable Gaming Distributors, and Solid Gaming provide jobs and services that keep charitable gaming strong and locally driven.

Senate Bill 2384 would give large, multinational manufacturers a monopoly-like advantage, severely damaging local distributors. These corporations are already using aggressive tactics, such as "shadow" distributorships and incentive programs, to push out smaller competitors and undermine the competitive market we've worked to build.

By passing this bill, you will harm small businesses like CGT and limit the support for charitable causes that rely on our games. The impact on North Dakota's economy and communities could be significant.

I urge you to oppose Senate Bill 2384 to protect local distributors, small businesses, and the integrity of the state's charitable gaming market. Thank you for your time and attention.

Sincerely,

A handwritten signature in black ink, appearing to read 'Alfred S. DeLeon'.

Alfred S. DeLeon  
**President**  
**Creative Game Technologies, LLC**



February 3, 2025

The Honorable Bob Paulson  
9801 Highway 52 South  
Minot, ND 58701-2426  
bpaulson@ndlegis.gov  
*Sent Via Email*

**RE: Opposition to Senate Bill 2384**

Dear Senator Paulson,

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By passing this bill, you will harm small businesses like CGT and limit the support for charitable causes that rely on our games. The impact on North Dakota's economy and communities could be significant.

I urge you to oppose Senate Bill 2384 to protect local distributors, small businesses, and the integrity of the state's charitable gaming market. Thank you for your time and attention.

Sincerely,

A handwritten signature in black ink, appearing to read 'Alfred S. DeLeon'.

Alfred S. DeLeon  
**President**  
**Creative Game Technologies, LLC**



February 4, 2025

Senate Judiciary Committee  
State Capitol  
Bismarck, ND 58505

**RE: Opposition to Senate Bill 2384**

Dear Mr. Chairwoman Larson and members of the Committee,

I'm reaching out personally to urge you to oppose Senate Bill 2384. As the Chief Operating Officer of Creative Game Technologies, LLC (CGT), I've had the privilege of working closely with North Dakota's gaming distributors since 2017. Because I work with these gaming distributors on a daily basis, I have seen firsthand the dedication, investment, and hard work they put into supporting charities and growing their businesses.

Distributors like FPN Gaming, Charitable Gaming Distributors, IF LaFleur & Son, Plains Gaming Distributing, and Solid Gaming have spent years building relationships, creating jobs, and ensuring North Dakota's charitable electronic pull-tab program thrives. Their commitment to service is what makes the system work. If out-of-state companies take over distribution, I fear the personal attention, trust, and local investment that make this program successful will be lost.

North Dakota's charitable gaming industry isn't just business; it's people, families, and communities. I strongly support keeping distribution local to protect what's been built. I appreciate your time and consideration, and I hope you'll stand with us in preserving this model.  
Best regards,

Chad Criger

Chad Criger

COO, Creative Game Technologies, LLC



Testimony in **Opposition** to Senate Bill 2384

Submitted by US Off-Track, LLC

Members of the North Dakota Legislature, US Off-Track, LLC respectfully asks that you **Oppose** Senate Bill 2384 which eliminates the authorization of wagering on simulcast dog/greyhound racing under the certificate system.

US Off-Track, LLC is owned by three Florida greyhound track operators, St. Petersburg Kennel Club, Inc. d/b/a Derby Lane (opened in 1925), Jacksonville Racing (opened 1935), Palm Beach Kennel Club (opened 1932). It is managed by US Off-Track, Inc. (owned by St. Petersburg Kennel Club, Inc.). The tracks have been sending their racing broadcasts and wagering rights to North Dakota OTBs since the early 90's until December, 2020, as there was ban on live greyhound racing in Florida. It is still legal in Florida to wager on simulcast greyhounds at the tracks/OTBs and through the ADWs. US Off-Track is also licensed as an Account Deposit Wagering Service Provider ("ADW") in the State of North Dakota offering wagers on foreign and domestic horse and greyhound racing. Seven of the 16 North Dakota- licensed ADWs offer wagering on greyhounds to their account holders.

A little background:

In 1989, North Dakota passed legislation to allow racetracks and OTBs located within the State to wager on out-of-state horse and dog/greyhound racing. The North Dakota simulcast network opened in 1990 and was a huge success for the State, contributing new tax revenues, generating the funds to run the North Dakota Racing Commission, contributing to nonprofit organizations and building an award winning statewide industry. For over three decades, wagering on greyhounds and horses at OTB locations has continued in the State of North Dakota.

In December 1999, with the advent of legislation in the State of Oregon to permit multi-jurisdictional hubs, US Off-Track d/b/a Greyhound Channel applied for and was issued a license to conduct account wagering. In April, 2000, equipped with a state-of-the art AmTote International multi-community totalizator hub supported by a highly trained staff of wagering operators and customer service representatives commenced taking wagers on horse and dog racing. We also offer services to other ADWs licensed in other jurisdictions. In May 2023, US Off-Track applied for and was granted a Multi-Jurisdictional Service Provider and Account Deposit Wagering License from the North Dakota Racing Commission.



In 2007, the State passed legislation which allowed for licensing and regulation of Simulcast and Account Deposit Wagering Service Providers (ADWs). ND Admin Code Section 69.5-01-11-01 "Account Wagering" or "Account Deposit Wagering" ("ADW") means a form of pari-mutuel wagering in which an individual deposits money in an account and uses the account balance to pay for pari-mutuel wagers.

These ADW providers allow individuals (national and international) to establish an account for the purpose of placing pari-mutuel wagers telephonically or electronically on races conducted at domestic- and foreign-licensed horse and greyhound tracks. Prior to licensure, all ADWs are required to contract with a non-profit charity and negotiate a portion of all wagers to said charity. All contracts vary between ADW's and the charities. Taxes are .25% with a cap of \$420,000 annually per ADW. The .25% tax is broken down as follows: 1/16th to the General Fund, 1/16th to the Breeders' Fund, 1/16th to the Purse Fund and 1/16th to the the Promotional Fund. Also, 100% of all breakage (the portion of a pari-mutuel pool which is computed by the totalizator/certificate system rounding down to the nearest multiple of 10 cents and is not distributed to the contributors or withheld by the host track) goes to the Promotional Fund that caps at the first 20 million annually wagered per each ADW. There is also an initial license/application fee; background checks and annual license fee for the entities and individual staff members that is paid to the State/Racing Commission.

It is very important to understand that there is a vast difference between conducting a live greyhound race meet and wagering on greyhound racing. At this time, there are approximately 20 States that allow wagering on domestic and foreign greyhound racing. There are two live tracks in West Virginia and many international tracks.

In 2024, approximately 75% of our customer's wagers were placed on US and International greyhound racing. If Senate Bill 2384 is passed as written, US Off-Track will lose valuable content for it's simulcast operations and it's continued business viability in North Dakota will be threatened.

US Off-Track, LLC urges you to **Vote No** on Senate Bill 2384

+1 (727) 812-3221



lorilee.goodall@usofftrack.com





**1240 Coral Way, Singer Island, FL 33404**

Members of the N Dakota Legislature;

I am Michael Weiss, President of PariBet LLC, an Advanced Deposit Wagering Company licensed in North Dakota.

Racing is not just a Sport, Racing is a business that stretches from jockeys, to fans, veterinarians, farms and communities. Racing has a very strong impact on the economy, agriculture and so much more in the community in which it operates.

As a business licensed in your state, my company has paid to the State of North Dakota over 5 million in tax dollars and has contributed another 1.5 million dollars in support of horsemen and the racetrack. I do not understand how one group, without any ties or business in North Dakota, that does not care for Greyhound racing, can step into your State, submit a self-serving bill and manipulate the livelihoods of individuals and companies that have supported and contributed so much to your state's economy for decades. If this bill is passed as written, companies such as my own would be forced to either leave North Dakota or close. Either option will definitely send some of my employees to the unemployment line.

Also, I personally, have donated my time to reopen and manage the Fargo Racetrack (Horse Racing North Dakota), HRND. PariBet has created the "PRISE" PROGRAM (Paribet Racing Student Experience - see brochure below.) in which my wife and I train and mentor University Students and help them find jobs and careers at our own expense. One student, in particular, is your current racing manager, Hugh Drexler.

**My request today is for changes to SB #2347, which states it being illegal to wager on Greyhound racing.**

**Specifically:**

**Section 1. Amendment. section 53-06.2-01 of the North Dakota Century Code #15. Please leave as originally written:**

**15. Racing means live or simulcast horse racing under the certificate system or simulcast dog racing under the certificate system.**

**And**

**Section 5. Amendment. Section 53-06.2-07 #4. Please strike this from the Bill:**

**4. A licensee, including totalizator provider or service provider may not offer bets or wagers on dog races.**

I also must point out that PariBet currently has customers that reside internationally. There are countries in the world in which Greyhound racing is revered and highly regulated. The way the Bill is currently being proposed, my international customers would not be allowed to wager on a legal international jurisdiction.

Ireland, for example, has a huge Greyhound celebration which includes the Irish Greyhound Derby. The Derby is a highly regulated event and a huge festival! People come from all over the world for the event.

For example, a customer of ours, in Switzerland would like to wager on Irish greyhounds, or Australian Greyhounds, Countries where Greyhound racing is regulated and legal. We should not be telling our customers they are forbidden. They would move their business somewhere else. I would certainly lose customers, including the business they do with me in the horse industry worldwide.

My wife and I have enjoyed our years of being licensed in North Dakota. We support the State and Racing with our Tax and Charitable donations of not only monies, but our time.

Again, I respectfully ask that SB No 2347 not be passed as written.

Thank you,

Michael Weiss  
President, PariBet LLC  
(614) 496-8383



The students that saved the track.

11

## About PariBet

[www.pariбет.com](http://www.pariбет.com) is a pari-mutuel ADW (advanced deposit wagering) service, providing legal and secure online account wagering for Horse and Greyhound racing with partner tracks from across the world. PariBet LLC is licensed in the State of North Dakota, USA and is regulated by the North Dakota Racing Commission. All wagers placed through [pariбет.com](http://pariбет.com) are commingled with contracted and partnered host tracks pari-mutuel pools.

PariBet works to strengthen the racing industry through educational partnerships providing real world experience for students.

## Rillito Racetrack

Historic Rillito Racetrack, the birthplace of Quarter Horse Breeding and Racing, opened in 1943. It is listed in the National Registry of Historic Places. The Rillito Park Foundation is a non-profit organization founded by area businessmen desiring to save the track along with the adjacent Jelks Stud Farm.

The Foundation hired PariBet's Michael Weiss to bring his expertise to this endeavor. They have been working together for the past five years. Successful continuance of racing and turning the Jelks Farm into a museum that will enhance the experiences of both citizens and visitors to Tucson is the Foundation's focus.

*"A big thank you to Mike Weiss of Rillito Park and PariBet and to Rillito Park Foundation for all they are doing to change the lives of students from The University of Arizona College of Agriculture and Life Sciences."*

-- Dr. Shane Burgess

Vice President and Charles-Sander Dean Agriculture, Life and Veterinary Sciences, and Cooperative Extension  
The University of Arizona

## **P.R.I.S.E. Program**

PariBet Racing Industry Student Experience (P.R.I.S.E.) was created by Michael Weiss, President of PariBet and RTIP Alum, as an educational outreach program. PRISE represents a partnership between PariBet, the Rillito Park Foundation, the University of Arizona College of Agriculture and Life Sciences and its RaceTrack Industry Program. Through this program, internship positions have been created at Rillito Park Racetrack in Tucson, Arizona. Students interested in working at a racetrack get hands on, in the trenches experience working in the racing office, media centers, mutuels, hospitality, admissions and management. Every aspect involving creating the racetrack experience for racing fans is handled by the interns in the PRISE program. Students receive payment during their internship as well as college credit toward their degree.

A new program, Equine Wellness, is being developed by the PRISE program. The Track Veterinarian and Stewards are working with College of Agriculture and Life Sciences students not involved through the RTIP. One goal is to educate trainers in equine nutrition and new training methods. Another is to develop a program which will be used to evaluate the soundness and health of the horses participating in the race meet. Ultimately, the goal is to enhance the health of the athletes and protect the integrity of the sport.

PRISE program interns have been highlighted in the Paulick Reports. A "must read" among racing industry members and fans. Bios can be found at **[www.paulickreport.com/features/racing-industry-student-experience](http://www.paulickreport.com/features/racing-industry-student-experience)**. Also look for the "Where are They Now" features on P.R.I.S.E. participants.

PariBet, through its connections in the racing industry, has also been instrumental in helping graduating students find full time employment and undergrads find internships. Past students mentoring at PRISE have been placed in strong leadership positions in Breeding Farms, Tote Companies, The New York Jockey Club and top racetracks.

## **PariBet Gives Back!**

Other projects include working with the North Dakota Racing Commission to manage the North Dakota Horse Park. In 2012, live racing returned to Fargo, North Dakota, after a two-year absence. Michael Weiss, from PariBet, was instrumental in reopening the successful live meet, which has continued to run each July.

PariBet, to date, has given contributions exceeding \$5,000,000 and hundreds of man hours back to the industry. PariBet's contributions support live racing, the P.R.I.S.E. student program, Thoroughbred and

Quarter Horse Associations, student scholarships, and a partnership with World Breeders Cup Championships, Breeds funds and racing promotion funds as well as Disabled Jockeys.

## **University of Arizona**

### **College of Agriculture**

### **and Life Sciences**

The shining jewel of the College of Agriculture & Life Sciences at the University of Arizona is the Race Track Industry Program (RTIP). Established in 1970, the program educates the future leaders of the racetrack industry.

Many of the RTIP Alumni are current luminaries in the industry including two-time triple crown winning trainer, Bob Baffert. P.R.I.S.E students have proven to become the racing industry's future. They help to run Rillito Racetrack by participating in active roles such as: Assistant General Manager, placing judge, photo finish operator, TV graphics, racing office, handicappers, program development, social media, outriding and much more. This experience has prepared them to take active roles in moving racing into the future and exposing new and younger audiences to the sport.



February 4, 2025

Senate Judiciary Committee  
State Capitol  
Bismarck, ND 58505



SB 2384—Do Not Pass

Dear Chairwoman Larson and members of the Committee,

My name is Brook Lyter, and I am the President of FPN Gaming. I have been a licensed North Dakota distributor since 2009, with sixteen (16) full-time employees and warehouses in Bismarck, Fargo, and Devils Lake.

I strongly OPPOSE and urge you to vote DO NOT PASS on Senate Bill 2384.

I am opposed to the key aspect of this bill, which proposes changing the distribution model in North Dakota to allow manufacturers to market directly to organizations. This bill would effectively threaten the livelihood of North Dakota-based distributors and their employees and open up a big can of worms for the apparent benefit of a single outside interest.

All of our manufacturing partners and customers support the existing distribution model, so this bill is quite a surprise.

Here are a few points for consideration:

First, it would be blatantly unfair to pull the rug on distributors after having made significant investments and literally performed the heavy lifting in the field to get where the industry is today.

Second, a key feature of the existing distribution model ensures that charities have abundant options and convenient access to all products while only needing one (1) phone number to call for service, a considerable benefit many charities enjoy. Easy access leads to diversification of the products themselves, and due to this structure, all manufacturers, regardless of size, are on a level playing ground in North Dakota.

Third, eliminating distributors would not necessarily reduce pricing on electronic pull tabs in North Dakota. On the contrary, it could increase prices for other products such as pull tabs, bingo supplies, tables and equipment, etc. I also fear that, given the opportunity, a large manufacturer could aggressively attempt to gain more control and

monopolize the market, leading to job losses and fewer choices for licensed organizations.

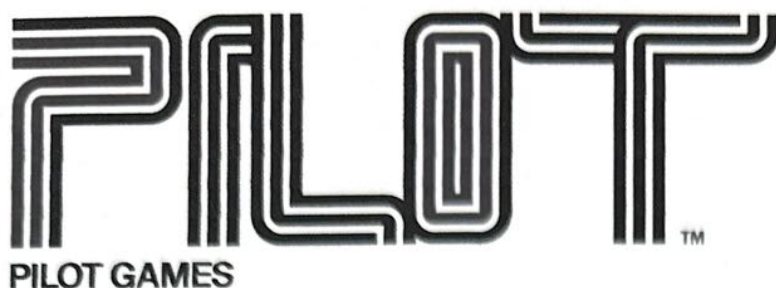
In conclusion, please vote DO NOT PASS on SB 2384. Doing so will protect North Dakota jobs, maintain efficient and cost-effective distribution for charities, and uphold the integrity of our local charitable gaming industry.

Thank you for your time and consideration.

Sincerely,

Brook Lyter  
FPN Gaming/President





February 4th, 2025

Senate Judiciary Committee  
State Capitol  
Bismarck, ND 58505

SB 2384 – Do Not Pass

Dear Chairwoman Larson and Members of the Committee,

My name is Abhinay Bhagavatula, and I serve as the Chief Product Officer at Pilot Games. We are a manufacturer of gaming equipment, based in Minnetonka, MN; Detroit, MI; Atlanta, GA; and Reno, NV, and have been operating in North Dakota since 2019.

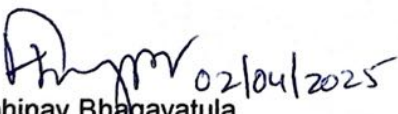
We urge you to oppose SB 2384 and vote for a DO NOT PASS resolution.

The existing gaming model in North Dakota has proven successful for decades, supporting local businesses and contributing to community development through significant investments by distributors. We are concerned that SB 2384 could harm or potentially eliminate many of these North Dakota distributors, reduce competition, and lead to industry consolidation, which would adversely affect the market.

We respectfully request that you vote DO NOT PASS on SB 2384.

Thank you for considering our position on this matter.

Sincerely,

  
Abhinay Bhagavatula  
Chief Product Officer, Pilot Games  
630-267-6840

Pilot Games, Inc.  
4737 County Road 101 #309  
Minnetonka, MN 55345

 [www.pilotgames.com](http://www.pilotgames.com)  
 [info@pilotgames.com](mailto:info@pilotgames.com)



13011 W. Highway 42, Suite 107  
Prospect, KY 40059, USA  
Office: (502) 292-1075 Fax: (502) 292-1076

February 4, 2025

Subject: Letter in Opposition to Senate Bill 2384

Dear Members of the North Dakota Legislature,

AmWest Entertainment, LLC has been processing pari-mutuel wagers on horse and greyhound racing for over twenty-one years. We are the largest independent ADW in the North American market. Originally, we were an operator of off-track betting facilities and shifted to online wagering ([www.AmWager.com](http://www.AmWager.com)) as customer and market preferences changed.

Proudly, in 2024 we received licensure from the North Dakota Racing Commission as an Advanced Deposit Wagering (ADW) company to accept wagers from residents from inside and outside the State of North Dakota on horse and greyhound racing.

We are writing in opposition to SB2384.

**SB2384**

Regardless of where the customer lives, an ADW customer's wagers are considered North Dakota wagers. SB2384 intends to ban wagering on Greyhound racing by all our customers and all residents of North Dakota. While there are only two remaining greyhound tracks in the US that operate live racing, there are many tracks worldwide that offer the sport. Our clientele enjoys the sport of greyhound racing and wagering on it. On any given day, over 10% of our wagering is done on greyhound racing. Many of our customers wager on greyhound racing exclusively, and another significant portion of our customer base makes most of their wagers on greyhound races and a much smaller amount on horse racing.

Even though there is no live greyhound racing in North Dakota, wagering on the sport of greyhound racing supports live horse racing in the state. The fees in which all ADW operators pay go to support horse racing prize money known as "purse money", breeding funds, and to the Racing Commission.

If SB2384 becomes law, ADWs would lose a significant amount of customers. The cohort of customers who wager all or a predominant amount of their money on greyhound racing will disappear and the horse racing industry in North Dakota would be left hurting, dealing with the unnecessary negative financial consequences.

We urge you to support the farmers and horsemen of North Dakota by opposing SB2384. It is harmful to the economy and residents of North Dakota.



13011 W. Highway 42, Suite 107  
Prospect, KY 40059, USA  
Office: (502) 292-1075 Fax: (502) 292-1076

Thank you for the opportunity to provide this testimony.

Yours Truly

A handwritten signature in black ink, appearing to read 'Nelson Clemmens', written in a cursive style.

Nelson Clemmens

Founder & CEO  
AmWest Entertainment, LLC

**SENATE JUDICIARY COMMITTEE**  
**Testimony on Senate Bill 2384**

February 5<sup>th</sup>, 2025

Submitted by Janelle Mitzel, Development Homes, Inc.

Madam Chairperson Larson & Committee Members,

Thank you for your consideration of a **Do Not Pass** on SB 2384. This bill allows for the international gaming manufacturers to sell electronic products directly to the ND charities.

**Development Homes, Inc:**

- DHI is a non-profit organization in Grand Forks providing community-based support services to persons with disabilities from all over ND.
- DHI has residential services including seven group homes, two duplex facilities, a multi-unit autism living center, two transitional living centers and multiple independent living settings.
- DHI provides vocational services including job training and placement, and family services including respite care and in-home support.
- DHI serves approximately two hundred individuals from children to adults, serving through all stages of life.
- DHI is currently the 12<sup>th</sup> largest employer in Grand Forks, employing 450 to 500 people. Our economic footprint is vital to this community.

This bill essentially eliminates North Dakota gaming distributors from selling and distributing gaming electronic products. Many seem to think eliminating the distributors will lower the cost of electronics, however, we have found the ND charitable gaming distributors are working hard to keep prices competitive, while international companies want to dictate and control the entire pricing structure.

The charitable gaming organizations are concerned if the distributors are not required to sell, the limited number of manufacturers will monopolize the market with price demands and a take-it-or-leave-it strategy. International manufacturers do not care about local charities and ND; North Dakota distributors do.

This bill is funded by international companies interfering in the ND charitable gaming market. Charitable gaming distributors are local, employee local people, and reside in North Dakota.

Keep North Dakota charitable gaming local and vote **NO** on **SB 2384**.

t. 1 415 464 4882

f. 1 859 559 0536

www.watchandwager.com

700 Larkspur Landing Cir, Ste 199  
Larkspur, CA 94939Tuesday 4<sup>th</sup> February 2025

To: Members of the North Dakota Senate Judiciary Committee

Cc: North Dakota Racing Commission

**RE: Opposition to Draft Bills SB2347 and SB2384 – Written Testimony**

Dear Members of the North Dakota Senate Judiciary Committee

**Purpose of letter**

The purpose of this letter (and the testimony provided) is to express our strong objection to Bills SB2347 and SB2384. Both the Bills suggest the potential banning of wagers placed on greyhound racing under our current advanced deposit wagering (ADW) licence with the NDRC. The rationale for this opposition is detailed below.

**Executive Summary**

In summary we believe it would have a significant impact on the NDRC, the General Fund, the Horse Breeders Fund, the Promotional Fund and the General Operating Fund, plus the Charities that we support, and therefore the State of ND. This would mean that we will review our licensing strategy both domestically in the USA and internationally, so impacting our licensed presence in ND.

We consider this to be a serious situation, motivated by external operators, with no real interest in the ND economy, and Horseracing in the State. This particularly applies to the potential for the legalization of Historic Horse Racing Machines (HHR), which has only been framed to support large operators from outside of the State. We consider they are poor pieces of draft legislation drafted to benefit State operators.

Without talking for them we believe there is strong support for the opposition amongst all the major licensed ADW operators in the State, and all other interested parties, including our charitable partners and of course the future of horseracing and an agricultural way of life in the State of ND.

Hence our testimony, our strong objection and recommendation for a NO position on both Bills.

**Company Overview**

A quick reminder of the credentials of WatchandWager.com. I am the President and have over 30 years industry experience. We are fully owned by Webis Holdings (UK). We run two main operations in the US – the principle being our ADW operations at [www.watchandwager.com](http://www.watchandwager.com). We have been licensed by the NDRC since inception in 2012. Below I highlight our key metrics since inception. These figures can and have been audited internally by KPMG. In addition, they are available via our Settlement Agent CHRIMS if required. So, they are factually correct and of course there are significant sums of money and contributions to the State of ND, now seriously under threat.

A handwritten signature in black ink, appearing to be "WJ", located in the bottom right corner of the page.



**Impact on Handle**

WAW has handled just above USD \$430million across all breed types under its current ADW Operator license through the NDRC. Trends have been stable per annum since inception.

**Impact upon North Dakota – General Fund**

As a result, Payments of Betting Duty to ND State (the Four Funds listed above) have totaled over USD \$1million.

**Impact upon Charities**

As a result, Payments to our contracted ND Charities have totaled over USD \$430, 000.

**Impact overall**

These are significant sums of funds for the State of ND and would be at threat. In the avoidance of doubt, it would be highly likely that WAW would not seek a license renewal in ND for 2026, if these Bills were passed.

Whilst of course we do not know the figures for the other ADW operators currently licensed by the NDRC – I would assume that our figures stated below would multiply by many times, when the sums from all licensed operators are impacted from this change.

**Motives for such changes**

I would opine that the motive behind both Bills is simply to allow Out of State operators to benefit from two very poor draft bills in regard of HHR. The wording is restrictive in nature and only of benefit of Out of State operators – so money going out of North Dakota.

**Exacta Systems**

It is believed that the above-named supplier could be the principal supplier of the machines. It should be noted that at time of writing we do not believe that technology is pari-mutuel in nature. These raise significant legal concerns.

**Other Options for WatchandWager**

Management is already considering other options should these Bills pass forward. We must protect our business, and the scenario would be that we would not apply for a license renewal as an ADW under the NDRC for 2026.



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[www.watchandwager.com](http://www.watchandwager.com)

700 Larkspur Landing Cir, Ste 199  
Larkspur, CA 94939

## Summary

In summary our view is these are badly thought-out Bills, drafted to take revenue out of the State. They will have a significant negative impact on levy (through the Funds) and charitable contributions. This would have a knock-on effect on the viability of Horseracing, jobs and a whole agricultural way of life in North Dakota.

We strongly oppose opposition to both Bills and a NO Vote.

Any questions, let me know, my details below.

Yours sincerely

A handwritten signature in black ink, appearing to read "Ed Comins", with a long, sweeping underline.

Ed Comins

President

WatchandWager.com LLC

[www.webisholdingsplc.com](http://www.webisholdingsplc.com)

[www.watchandwager.com](http://www.watchandwager.com)

c: +1 925 336 4499



# Enhancing Our Impact

## 2024 Annual Report

### Our Purpose

NDAD (the North Dakota Association for the Disabled) is a nonprofit, charitable organization that assists people with health challenges in North Dakota. Our mission is to enhance the quality of lives of individuals facing health challenges.

### Who We Help

Here are a few people from each of our regions who have shared their NDAD story with us. See all at [ndad.org](https://ndad.org).



#### Kristi Dilger

(Bismarck)

Condition: Juvenile Rheumatoid Arthritis

**How NDAD helped:**  
Medical Equipment



#### Anne Compton

(Grand Forks)

Condition: Parkinson's Disease

**How NDAD helped:**  
Community Fundraiser



#### Roger Wilson

(Dickinson)

Condition: Lymphoma

**How NDAD helped:**  
Prescription Assistance  
Medical Travel, Lodging



#### Lynette Deaver

Condition: Anxiety, Depression, Arthritis

**Larry Hanson**  
Condition: Anxiety, Depression, Epilepsy  
(Minot)

**How NDAD helped:**  
Paratransit Assistance

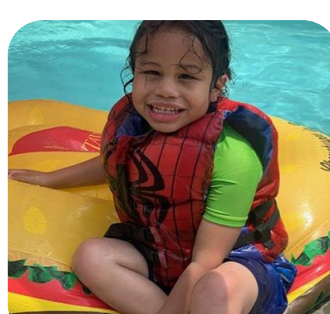


#### Greg Lane

(Fargo)

Condition: Diabetes, Chronic Kidney Disease, Coronary Artery Disease

**How NDAD helped:**  
Prescription Assistance, Equipment, Paratransit Assistance



#### Geno Williams

(Williston)

Condition: Autism

**How NDAD helped:**  
Adaptive Recreation Assistance



# Community Impact

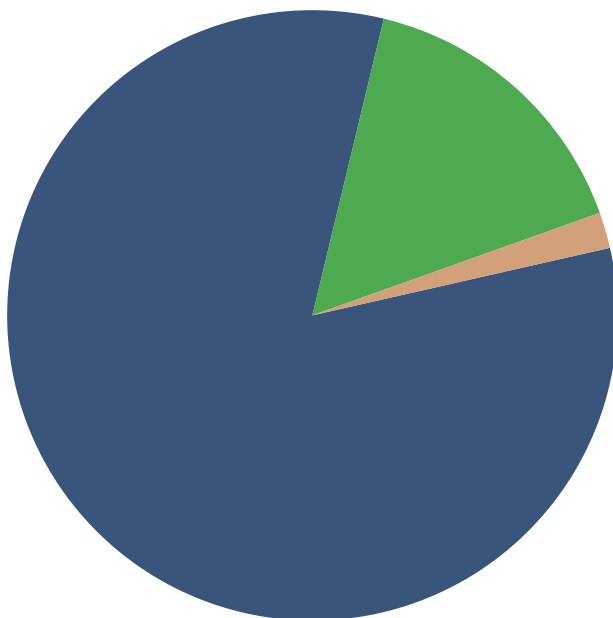
- Direct Financial Assistance
  - Prescription Medication
  - Medical Equipment & Supplies
  - Medical Travel
  - Accessibility & Paratransit
- Healthcare Equipment Loan Program
- Adaptive Recreation Events & Activities
- Community Fundraising Projects
- Organ Transplant Fund
- Information, Referral and Advocacy

To read more about these programs, visit [ndad.org](https://ndad.org)

## 2024 at a Glance

- Loaned **5,424 pieces of medical equipment** to **2,940 individuals** saving North Dakota residents **over \$664,040**
- **6,121 prescriptions** filled
- **2,134 medical trips** funded
- Purchased **328 pieces of medical equipment** and **567 medical supplies**
- **Wheelchair-accessible van** loaned to 126 individuals **for 246 trips.**
- Funds totaling **\$100,050 awarded to 24 organizations** to either assist individuals with disabilities or those otherwise at risk
- **8,049 accessible rides** funded for employment, shopping, and community events
- **4,465 hours** personal attendant care, respite care provided
- **50,665 interactions made**, such as phone calls, emails and other communication

## Financial Impact\*



**82.4%**

Program  
Services

**\$2,235,103**

**15.8 %**

Management &  
General

**\$428,292**

**1.9%**

Fundraising

**\$53,248**

**SB 2384**  
**Senate Judiciary Committee**  
**Submitted by Don Santer for NDAD**  
**02/05/2025**

Chairman Larson and Committee Members,

Thank you for the opportunity to provide information regarding the charitable gaming industry of North Dakota. My name is Don Santer, representing the North Dakota Association for the Disabled (NDAD). For 50 years, NDAD has been dedicated to improving the quality of life for persons with disabilities and health challenges across North Dakota. NDAD is **Opposed** to **SB 2384**.

NDAD is a non-profit, charitable organization serving individuals with health concerns and disabilities throughout the state from our six locations in Bismarck, Dickinson, Fargo, Grand Forks, Minot, and Williston. In 2024, NDAD assisted thousands of North Dakota residents with more than **\$2.23 million** in services and resources that may have been otherwise unavailable to them. We work diligently to avoid duplicating services provided by other state or local entities, making us a crucial last resort for many individuals.

In 2024, NDAD funded most of its services through charitable gaming funds, which enabled us to make a significant impact on the lives of people with health challenges and their families:

- **6,121 prescriptions for covered medications:** Ensuring individuals have access to necessary medications to manage their health conditions.
- **2,134 out-of-town medical travel trips:** Providing transportation for essential medical appointments, reducing the burden on individuals and their families.
- **8,049 accessible rides for employment, shopping, and community events:** Facilitating independence and participation in daily activities.
- **24 organizations were awarded \$100,050 in funds to assist individuals with disabilities or those otherwise at risk:** Supporting other organizations in their efforts to improve the lives of people with disabilities and health challenges.
- **328 pieces of medical equipment and 567 medical supplies purchased:** Ensuring individuals have the tools they need to manage their health and maintain their independence.
- **40-50 individuals assisted with adaptive recreational activities annually:** Promoting physical and mental well-being through inclusive recreational opportunities.
- **Healthcare Equipment Loan Program (HELP):** Serving several thousand households with 5,424 pieces of equipment, equating to a savings of more than \$664,000 for North Dakota residents.

Additionally, NDAD administers the North Dakota Transplant Fund and provides information, referral, and public awareness to North Dakota residents. Our mission is to

serve the residents of North Dakota, and it is through charitable gaming that we are able to fulfill this mission.

The services provided by NDAD are not just beneficial but essential for improving the lives of people with disabilities and health challenges. They offer the support needed to overcome barriers, achieve personal goals, and live fulfilling lives. By ensuring access to these services, we create a more inclusive and equitable society for everyone.

SB 2384 is an attempt by an out-of-state manufacturer to capture a larger share of the revenue from charitable gaming in North Dakota. Our local distributors provide essential jobs and services to charities and should not be excluded. Charities rely on these local service providers not just for bingo cards and pull tabs, but also for maintaining all gaming equipment, including electronic gaming devices. Quick service is crucial, and our local distributors offer almost 24/7 support, which an out-of-state manufacturer may not provide.

Local distributors are vital to the economy, providing jobs and services. Eliminating them will lead to job losses and negatively impact the local economy.

Proponents claim bypassing distributors will lower the price of electronic gaming devices (etabs). However, the bill lacks provisions to enforce this. Manufacturers are not obligated to reduce prices, and without competition, prices may increase. This could also lead to higher prices for other gaming products sold by distributors.

The bill could limit choices for charities, giving manufacturers more control over who can access their machines. This could force charities into long-term contracts, creating mini monopolies. Local distributors encourage market stability and maintain quality through competition.

NDAD stands behind North Dakota-based gaming distributors. SB 2384 could significantly harm local distributors and the charities they serve. It is crucial to consider these potential consequences and ensure that any changes do not harm the local economy or limit options for charities.

NDAD respectfully asks for a **Do Not Pass** recommendation on **SB 2384**.

Thank you, Madam Chairperson and members of the committee.

Respectfully,

Don Santer, NDAD  
dsanter@ndad.org

**Senate Judiciary Committee**  
**Testimony in Opposition to SB 2384**  
**Bill Kalanek, Charitable Gaming Association of ND**  
**February 5<sup>th</sup>,2025**

Chair Larson and members of the Senate Judiciary Committee, my name is Bill Kalanek and I'm before you today on behalf of CGAND, the Charitable Gaming Association of ND.

CGAND stands opposed to SB 2384, which would allow international manufacturers to sell electronic gaming products directly to North Dakota charities. North Dakota charitable gaming distributors have played an important role in the ND gaming market. Many years ago North Dakota legislators wisely created a three-tiered system, setting statutory parameters for North Dakota companies to be the go-between entities of charities and international manufacturers. Locally licensed ND distributors are responsible for selling and distributing gaming equipment used to conduct charitable gaming.

Currently North Dakota has 16 licensed gaming distributors scattered across the state selling gaming products and providing technical services to ND charities. Charities have been satisfied with the current structure, allowing for competitive prices and a wide range of products available. Distributors are locally owned, employ local people, and are considered experts in North Dakota market.

North Dakota currently does not have a licensed manufacturer in the state. If manufacturers are allowed to sell directly to charities competition will decrease and services will suffer.

The three-tiered system has been beneficial, and this bill is an overreach by manufacturers to dictate and control the industry. A few manufacturers will dominate the market, raising prices and eliminating North Dakota jobs.

CGAND encourages the committee to give a DO NOT PASS recommendation to **SB 2384**.

## Northland Gaming

7101 Chrisan Blvd  
Fargo ND 58104

Senate Judiciary Committee  
ND State Legislature  
Bismarck ND 58505

SB2384 for consideration of a Do Not Pass vote.

Dear Chairwoman Larson and fellow members of the Committee,

My name is William Garrett and I am the Owner operator of Northland Gaming a licensed Distributor in the state of North Dakota located in Fargo ND, I have been licensed in the state of North Dakota for the last 23 years and have been in the industry for 32 years and counting.

This bill directly targets distributors and is intended to put many of us out of business in short order if this bill were to pass. We would have no choice but to lay off employees that have good paying jobs here in the state of North Dakota. Our employees live here, have homes here, and spend their money here in our state. This Bill SB2384 would allow already out of state manufacturer's, to take even more of the money out of the state of ND. The current model (manufacturer to distributor to charitable organization to bar owners) in North Dakota has worked successfully for decades both in terms of regulatory and competition in the marketplace.

SB2384 if passed, would result in consolidation of gaming by reducing the number of distributors and possibly reducing the number of manufacturers in the marketplace, therefore reducing choices for the charities and creating the possibility of a monopoly by an out of state company.

Please consider a DO NOT PASS on Bill SB2384

Sincerely  
William Garrett  
Northland Gaming

**AMERICAN BIKERS AIMING TOWARD EDUCATION**

1001 South 22<sup>nd</sup> St Bismarck, ND 58504 • 701-223-5609 • [www.abatend.com](http://www.abatend.com)

Dear Senate Judiciary Committee Members,

My Name is Lonnie Bertch, I am the Charitable Gaming Manager for Abate of North Dakota. I am not able to attend the meeting today in person due to another commitment.

I am strongly opposed to senate bill 2384. It is my understanding that one of the reasons that the Manufacturers are giving to bypass ND Distributors, is Service. I can list a number of reasons this bill should not pass but I want to focus on service. When I need service on the Electronic E Tabs or other gaming equipment in my site, I contact the distributor. The distributor I use is a local ND business and can generally be at the site within a very short time. When I have had to contact the Manufacturers directly, I have had much slower service. The distributor is at the site monthly providing preventive service by keeping the machines clean and in good working order. These Distributors are North Dakota companies, they are our business partners and I respectfully request you oppose SB 2384.

Sincerely,

Lonnie Bertsch  
Executive Director  
ABATE of ND  
701-223-5609

TESTIMONY IN SUPPORT OF SENATE BILL 2384  
SENATE JUDICIARY COMMITTEE  
FEBRUARY 05, 2025

Good Afternoon Madam Chair and Senate Judiciary Committee. My name is Claire Cory. I am a North Dakota State Senator representing District 42, which includes northwest Grand Forks. I stand as the prime sponsor of Senate Bill 2384.

This bill does three things. It allows charities conducting gaming to work directly with the manufacturer of an electronic game, if they so choose. It cleans up some language related to physical stamps on electronic machines, which are no longer needed because the machines have serial numbers. Finally it eliminates wagering on dogs through the ADW system (as heard this morning on SB2347. Should 2347 pass, this language can be removed or amended to mirror it, as it currently does not include a phase out date.

I'm going to focus mostly on section 1 of the bill to explain what it does and does not do and why it's important.

- o Currently in ND charitable organizations conducting gaming MUST work through a distributor to get their gaming machines, fix the machines, file reports, etc.
- o The charity pays the manufacturer who in turn pays the distributor. This fee can be as high as 50-55% of the proceeds a charity is allowed to keep. Those agreements are confidential and many times a charity has no idea how much goes to the distributor or to the manufacturer. Distributors claim they get paid very little, other times manufacturers say they get paid very little.
- o Each individual situation could be different
- o Some of these large distributors have huge market share, upwards of 60% of all machine locations. There is almost no competition or bargaining power for charities.
- o In many other states, manufacturers are allowed to choose to work through a distributor or work directly with the charity or end user.
- o All this bill would do is give charities and manufacturers that want to work directly, an option to do so.



- o Charities that like their distributor can keep using them; those that don't or feel they don't have any bargaining power, could look at other options.
- o It brings competition and increased transparency—a charity will know when working directly with a manufacturer exactly how much they are getting paid; this has the potential to reduce costs for the charities through increased competition or not going through a middle-man.
- o It also streamlines issues when they arise. The machines and software are proprietary to the manufacturer—they are their machines, not the distributors. When things go wrong with them, charities have to work through a distributor to get them fixed. Sometimes this goes well, but other times it doesn't. Mfrs need to be able to deal directly with the charities on education and maintenance and repair.
- o Just a few things I was told when considering this bill:
  - Distributors do not have the necessary technical skills nor staff to fix machines,
  - They make frequent errors when filing reports
  - They have been found in at least one instance, but likely others, to be exploiting charities
  - Manufacturers have had servers pulled out without the proper reports being filed, causing headaches to the charities and to the state.
  - Distributors don't always install the machines properly.
  - Servers have been lost, so no one can recapture data.
  - The distributors have no financial interest in the equipment so they often don't care what happens to it.
- o This bill would allow manufacturers to protect their equipment and interests

I want to reiterate that this section does not eliminate distributors. Many manufacturers may still contract with a distributor to have boots on the ground, but this would allow for direct communication and access that is currently prohibited, which would streamline and solve many of the issues manufacturers and charities are seeing.

## Section 2

- o This is simply clean up language. There are issues of buying stamps and trying to put stamps on electronic games, which is unnecessary because they have serial numbers, so it strikes the need for stamps for those games.

## Section 3

- o Same changes as SB 2347 removing wagering on greyhounds



Madam Chair and committee members, this concludes my testimony. I will stand for any questions.

Respectfully submitted,

A handwritten signature in blue ink that reads "Claire Cory". The signature is written in a cursive style, with the first name "Claire" and the last name "Cory" clearly visible. A long, sweeping flourish extends from the end of the signature.

Claire Cory

# Regulatory OVERSIGHT

Reviewing, analyzing, and navigating compliance, enforcement, investigation, and litigation developments and trends in the state and federal regulatory landscape

## North Dakota Settles With Three Gaming Companies Accused of Exploiting Nonprofit



By Troutman Pepper Locke State Attorneys General Team on July 14, 2023

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allegations, the respondents acknowledged that their representatives committed conduct violating North Dakota gaming laws. The settlement agreement, subsequently, delineated multiple crucial elements:

1. David L. Wisdom and his immediate family were to be removed from ownership and involvement in the respondents' operations, indicating a significant shakeup in the companies' organizational structure.
2. The respondents were ordered to pay a considerable fine of \$125,000, in addition to attorney fees and costs, highlighting the financial repercussions of gaming law violations.
3. The agreement imposed a "deferred revocation" of the respondents' licenses, a provision emphasizing the consequences of repeated misconduct over a three-year probationary period.

Along with the settlement, Wrigley issued the following statement: "These gaming violations undermine the integrity of charitable gaming in North Dakota. Those responsible for these improper actions violated the public trust and the trust of the charities that relied on them. The last year has brought a new day in gaming enforcement, and the public can be assured that law enforcement and the outstanding professionals in the Attorney General's Gaming Division are working hard to protect the integrity of the limited charitable gaming that is permitted under North Dakota law."

Gaming Division Director Deb McDaniel also issued a statement: "Western Distributing, Plains Gaming Distributing, and Midwest Gaming Distributing intentionally used Wall of Honor to circumvent the gaming site rent limits set in law. The Gaming

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ensuring they operate within the bounds of the law. The enforcement action and settlement reinforce the importance of abiding by gaming laws and regulations to avoid severe penalties, including hefty fines and potential revocation of licenses. This case serves as a stark reminder to all stakeholders of the importance of lawful conduct and the severe consequences of falling foul of the rules.

## Troutman Pepper State Attorneys General Team







	<p><b><u>Ashley Taylor</u></b> – Co-leader and Firm Vice Chair</p> <p>Ashley is a partner in the firm's Regulatory Investigations, Strategy + Enforcement (RISE) Practice Group and co-leader of the State Attorneys General practice. He focuses primarily on federal and state government regulatory and enforcement matters involving state attorneys general, the Consumer Financial Protection Bureau (CFPB), and the Federal Trade Commission (FTC). Drawing upon his experience as a deputy attorney general, Ashley has developed an extensive consumer practice with regard to the consumer financial services industry.</p>
	<p><b><u>Clay Friedman</u></b> – Co-leader</p> <p>Clay is a partner in the firm's Regulatory Investigations, Strategy + Enforcement (RISE) Practice Group and co-leader of the State Attorneys General practice. Informed by nearly a decade in a state attorneys general office, and more than 25 years in private practice, Clay spends much of his time representing clients in singular or multistate regulatory actions. Clay has repeatedly led teams before all 50 state attorneys general and also handles matters with the Federal Trade Commission, the Consumer Financial Protection Bureau, and other local, state and federal agencies.</p>
	<p><b><u>Judy Jagdmann</u></b></p>

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	<p><b><u>Avi Schick</u></b></p> <p>A former deputy attorney general of New York, Avi applies his experience in bet-the-company matters, representing clients in criminal and civil investigations and enforcement actions before state and federal regulators, prosecutors and enforcement agencies.</p>
	<p><b><u>Michael Yaghi</u></b></p> <p>Michael handles high-profile state attorneys general, FTC, and CFPB investigations by advising clients through these complex government inquiries. He assists clients through the entire life cycle of investigations, from regulatory enforcement through formal litigation.</p>
	<p><b><u>Ketan Bhirud</u></b></p> <p>As a former government official at the state and federal level, Ketan leverages extensive experience in the public and private sectors to skillfully represent client interests.</p>
	<p><b><u>Tim Bado</u></b></p> <p>Tim is an attorney in the firm's Regulatory Investigations, Strategy + Enforcement (RISE) Practice Group, with a primary focus on financial services litigation.</p>
	<p><b><u>Chris Carlson</u></b></p> <p>Chris represents clients in regulatory, civil and criminal investigations and litigation. In his practice, Chris regularly employs his prior regulatory experience to benefit clients who are interacting with and being investigated by state attorneys general.</p>
	<p><b><u>Natalia Jacobo</u></b></p> <p>Natalia is an associate in the firm's business litigation practice. She recently received her J.D from the University of California, Davis School of Law.</p>
	<p><b><u>Namrata Kang</u></b></p> <p>Namrata is an associate in the firm's Regulatory Investigations, Strategy + Enforcement (RISE) Practice Group, based in the Washington, D.C. office. Her work includes advising clients in regulatory investigations and compliance matters, in addition to representing</p>

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Agree

Decline

	litigation involving the Telephone Consumer Protection Act (TCPA), Fair Credit Reporting Act (FCRA), Fair Debt Collection Practices Act (FDCPA), and other consumer privacy statutes. Susan also represents banks, fintechs, and financial services companies in connection with regulatory examinations and investigations brought by the CFPB, state attorneys general, and the California Department of Financial Protection and Innovation.
	<p><b><u>John Sample</u></b></p> <p>John represents clients in a wide variety of general and complex litigation matters, shareholder disputes, products liability, and privacy claims.</p>
	<p><b><u>Whitney Shephard</u></b></p> <p>Whitney is an attorney in the firm's Regulatory Investigations, Strategy + Enforcement (RISE) Practice Group. She represents clients facing state and federal regulatory investigations and enforcement actions, as well as related civil litigation.</p>
	<p><b><u>Trey Smith</u></b></p> <p>Trey is an associate in the firm's Regulatory Investigations, Strategy + Enforcement practice. His experience includes serving as a summer associate at the firm in 2021.</p>
	<p><b><u>Daniel Waltz</u></b></p> <p>An experienced litigator, Daniel advises and represents regional, national and international companies, financial institutions and insurers in all facets of business, complex commercial and insurance coverage litigation. He is committed to working with his clients to find creative solutions to meet their needs.</p>
	<p><b><u>Stephanie Kozol</u></b></p> <p>Stephanie is Troutman Pepper's senior government relations manager in the state attorneys general department.</p>

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Agree

Decline





February 5<sup>th</sup>, 2025

Senate Judiciary Committee

State Capital

Bismarck, ND 58505

SB 2384 – Recommendation of Do Not Pass

Dear Chairwoman Larson and Committee Members

Good day, my name is Joe Hoffert, an owner/partner of Western Distributing Company. Western Distributing Company has been a licensed Distributor working with Charities in North Dakota since 1992. We presently have 21 Full Time employees working around the State of North Dakota, with employees located in Bismarck, Minot, Fargo, Valley City and Minto.

I had previously sent an email stating my reasons to oppose SB 2384 and I would also like to submit written testimony to the committee.

The idea that allowing the manufacturers to market directly to the licensed organizations in North Dakota being beneficial to the organizations is fictional at best. Presently the manufacturers have a set Manufacturer Suggested Retail Price which is given to the distributors in the state. If they are presently providing an MSRP for Electronic Pull Tabs, why would they make an adjustment to the MSRP if they were allowed to market directly? With sixteen licensed distributors in the State of North Dakota there is certainly enough competition to provide aggressive pricing to the charities. If large out of state manufacturers are allowed to market direct, they will push out the distributors and smaller manufacturers and dictate the pricing to licensed organizations. Distributors have already been subjected to other gaming equipment increases due to inflation and have absorbed those cost increases due to competition. Without distributor competition these manufacturers can control the pricing and use inflation as a reason to continue pushing the pricing higher. If these manufacturers are using inflation as a reason to increase pricing on other gaming equipment, what is to stop them from doing the same thing with Electronic Pull Tabs?

We, along with the other distributors in the State of North Dakota have made a significant investment in our companies to provide the best services and products to the licensed organizations. We have sales and service people throughout the state along with vehicles and



admin@westerndistributingco.com  
www.westerndistributingco.com



**Office**  
701-223-0154  
**Service Dept.**  
877-743-8227



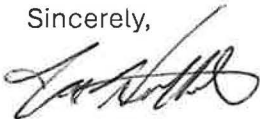
120 W Sweet Ave.  
Bismarck, ND 58504  
PO Box 832 58502

equipment to provide prompt service. If this bill were allowed to pass their livelihoods would be threatened and our investments significantly impacted.

In conclusion, please vote "DO NOT PASS" on SB 2384 to protect North Dakota businesses, jobs and charitable organizations.

Thank You for your time and consideration.

Sincerely,

A handwritten signature in black ink, appearing to read "Joe Hoffert", written in a cursive style.

Joe Hoffert

Western Distributing Company







# SPIRIT LAKE TRIBE

P.O. BOX 359 • FORT TOTTEN, ND 58335 • PHONE 701-766-4221 • FAX 701-766-4126

February 5, 2025

## Chairperson and Members of the Committee,

My name is Lonna J. Street, and I am the chairwoman of the Spirit Lake Tribe.

The Spirit Lake Tribe strongly opposes Senate Bill 2384, which seeks to authorize historic horse race wagering in North Dakota. This legislation represents yet another attempt by the state to expand gaming without consulting tribal nations, despite the legal protections afforded to us under federal law. This is a direct infringement on our sovereignty, an economic attack on our ability to provide for our people, and a continuation of the state's long-standing pattern of disregarding tribal rights in gaming policy.

The Indian Gaming Regulatory Act (IGRA) (25 U.S.C. § 2701 et seq.) was passed by Congress to ensure that tribes have exclusive rights to regulate gaming on their lands, recognizing gaming as a critical tool for economic self-sufficiency. By allowing non-tribal businesses to engage in pari-mutuel wagering on historic horse races, SB 2384 violates the intent of IGRA and undermines the Spirit Lake Tribe's ability to maintain control over gaming within our jurisdiction.

This state-sanctioned expansion of gambling was proposed without consultation with the Spirit Lake Tribe or any other tribal nations. That alone is unacceptable. Under Executive Order 13175 (Consultation and Coordination with Indian Tribal Governments), states government to engage in meaningful consultation with tribes before enacting policies that impact us. We have compacts and agreements with the state. Yet, once again, we were excluded from discussions while state leaders worked behind closed doors to pass legislation that will economically harm our people.

The Spirit Lake Casino and Resort is one of the primary economic engines for our community. Gaming revenue funds healthcare, education, elder services, and infrastructure for our people. When the state previously introduced electronic pull tab machines without consultation, it caused severe financial damage to tribal casinos, taking millions in revenue away from Native communities and redirecting it into the state's hands. SB 2384 follows the same pattern—authorizing a new form of gambling that will divert revenue away from tribal casinos and into non-tribal businesses.

This is not just about money; it is about our ability to be self-sufficient and to provide for our people. The state's continuous expansion of gaming without tribal input is a direct assault on our economic stability.

The State of North Dakota has a well-documented history of failing to engage in fair gaming negotiations with tribal nations. The introduction of pull-tab machines without tribal consultation shattered trust between the state and our nations, and now, with SB 2384, the state must not continue this pattern of disrespect and disregard for our rights.

Our gaming compact with North Dakota was negotiated under IGRA's requirement that the state act in good faith (25 U.S.C. § 2710(d)(3)(A)). If the state expands gaming opportunities for non-tribal entities while refusing to allow tribes the same opportunities, this is a clear violation of good faith negotiations.

Additionally, the bill allocates revenue from historic horse race wagering to state and local funds but excludes tribal governments entirely. This is yet another example of the state profiting from gaming while shutting tribes out of the conversation. If the state wants to expand gaming, then tribes must be included as equal partners.

February 5, 2025

Senate Judiciary Committee  
North Dakota Senate

Re: OPPOSE SB 2384

Chairwoman Larson and Members of the Committee

My name is Robert Harms, I am speaking for myself and ask you to OPPOSE SB 2384. I'm a partner in Western Distributing. We have 20 employees, 9 of whom are service techs who serve dozens of charities we do business with. The bill is bad for our state. Here's why:

**It's bad for ND BUSINESSES.** Distributors are ND companies. They've been in business for decades. They help grow the business and employ ND people. They support ND communities; live in and pay ND taxes. This bill hurts them in favor of an Ohio company.

**The bill hurts competition.** It consolidates gaming to a few large companies. It stifles competition from new, small manufacturers who won't have ND distributors to help introduce new products (competition) to ND charities. The result will be a few multi-national manufacturers dominating charitable gaming in ND.

**SB2384 is brought by ONE manufacturer** Arrow International Inc., in Cleveland Ohio, and is owned by Platinum Equity, with headquarters in LA, and offices in London and Singapore. Platinum has been consolidating gaming nationwide. The bill is an attempt to acquire market share and dominate the market through Legislation. That's wrong.

**The current model serves the state well.** Distributors, whether located in Fargo, Bismarck, Devils Lake or Williston provide close contact with charities, to meet their needs and provide prompt service. This relationship has produced millions of dollars to local communities for public radio, the arts, local sports organizations, economic development, and fraternal and veterans' organizations. This model produced \$74 million to charities and \$20 million in state taxes in 2022. It works.

The current model provides effective regulatory authority (Attorney General) through close contact with distributors who work in the industry daily, rather than dealing with multi-national organizations located in Cleveland, Ohio (or LA).

There is NO legitimate policy reason to disrupt the current model that serves well, our State's charitable gaming. Please vote DO NOT PASS on SB 2384.



Robert W. Harms,  
Williston, North Dakota

## Testimony

SB2384

Chairman Larson

Good afternoon, Chairman Larson and members of the Judiciary committee, my name is Rikki Iverson, Gaming Manager with Fraser, Ltd.

Thank you for your time today. I'm not in favor of this bill because it will potentially eliminate the exceptional customer service experience, support, and quality that we expect and receive from our state distributors. If manufacturers are allowed to sell, market, or distribute directly to licensed organizations the effect would be disastrous. The exceptional customer service we as charities, the bar/business owners we work with, and our managers experience now as the norm would end. We understand what the service techs provide and without that service our support and day-to-day gaming flow and function is going to epically fail. Machines are NOT fail proof and when they fail, they are incredible headaches for the sites/bars they are in, the charities they are earning dollars for, and the player standing in front of them. At this time, we can answer their questions, problem solve and troubleshoot solutions with quick calls to support techs in our local areas. Most of these techs are available to be onsite right away or within hours. We work with our distributors to dispatch them as they are needed.

If you make larger national, out of state entities capable of direct marketing to us, this amazing and responsive customer service, that frankly we expect, is no longer going to be the industry standard. The calm and easy atmosphere surrounding the machines will in all likelihood disappear. And as customers begin to experience dissatisfaction, as well as bar owners and managers, not to mention the charities that were promised the same service,

remember, this service has always, just been here. If it stops it will be so devastating, that there will be screaming from all levels, wondering who are we supposed to call. I can assure you that everyone will be calling. I also am sure that there is no one in this room that wants their number to be the one that's called. There will be consequences for all of us. It will be far reaching and I don't think you are anticipating the range that this action will have. These are more than smooth day-to-day operations you also must understand that these are jobs and careers of a significant number of North Dakotans.

My bottom line in speaking to you today is that this bill will result in long lists of complaints and concerns to whoever takes on the oversight of charitable gaming whether it continues to be the office of the Attorney General or another entity. So please consider this when you vote on this bill and vote no so we can all continue to experience smooth operations in the day-to-day running of our sites and benefit from the gaming industry.

This concludes my testimony.

# 2025 SENATE STANDING COMMITTEE MINUTES

## Judiciary Committee Peace Garden Room, State Capitol

SB 2384  
2/10/2025

Relating to the authorized sale of electronic gaming devices by manufacturers and live or simulcast horse racing.

4:43 p.m. Chair Larson opened the hearing.

Members present:

Chair Larson, Vice Chairman Paulson, Senators: Castaneda, Cory, Luick, Myrdal, Braunberger.

### Discussion Topics:

- Maintenance collaboration
- Manufacturer notification requirements

4:43 p.m. Senator Cory proposed verbal amendment to allow manufacturers to assist organizations with electronic pull tab maintenance, require notice for repairs, and phase out greyhound racing.

4:44 p.m. Senator Cory moved Amendment LC# 25.1323.01001.

4:44 p.m. Senator Myrdal seconded.

4:45 p.m. Voice Vote - Motion Passed.

4:45 p.m. Senator Luick moved a Do Pass as Amended and rerefer to Appropriations Committee.

4:46 p.m. Senator Cory seconded the motion.

Senators	Vote
Senator Diane Larson	Y
Senator Bob Paulson	Y
Senator Ryan Braunberger	N
Senator Jose L. Castaneda	Y
Senator Claire Cory	Y
Senator Larry Luick	Y
Senator Janne Myrdal	Y

Motion Passed 6-1-0.

4:46 p.m. Chair Larson will carry the bill.

4:46 p.m. Chair Larson closed the hearing.

Senate Judiciary Committee

SB 2384

2/10/2025

Page 2

*Kendra McCann, Committee Clerk*

Reconsidered SB 2384 on 2/11/2025.



Sixty-ninth  
Legislative Assembly  
of North Dakota

**PROPOSED AMENDMENTS TO**

**SENATE BILL NO. 2384**

Introduced by

Senators Cory, Patten

Representatives Hagert, Meier

2-10-25

fb 1085

1 A BILL for an Act to amend and reenact section 53-06.1-14, subsection 11 of section  
2 53-06.2-01, and sections 53-06.2-07 and 53-06.2-10 of the North Dakota Century Code, relating  
3 to the authorized sale of electronic gaming devices by manufacturers and live or simulcast  
4 horse racing; and to provide an effective date.

5 **BE IT ENACTED BY THE LEGISLATIVE ASSEMBLY OF NORTH DAKOTA:**

6 **SECTION 1. AMENDMENT.** Section 53-06.1-14 of the North Dakota Century Code is  
7 amended and reenacted as follows:

8 **53-06.1-14. Distributors and manufacturers.**

9 1. A manufacturer of pull tabs, bingo cards, electronic quick shot bingo systems and  
10 devices, or bingo card marking devices shall apply annually for a license and pay a  
11 license fee of five thousand five hundred dollars. A manufacturer of electronic pull tab  
12 systems and devices shall apply annually for a license and pay a license fee of ten  
13 thousand dollars. The attorney general shall deposit one thousand five hundred dollars  
14 of these fees into the charitable gaming technology fund under section 53-06.1-12.4. A  
15 manufacturer of paper pull tab dispensing devices shall apply annually for a license  
16 and pay a license fee of one thousand five hundred dollars. The attorney general shall  
17 deposit five hundred dollars of this fee into the charitable gaming technology fund  
18 under section 53-06.1-12.4. A manufacturer of electronic raffle systems shall apply  
19 annually for a license and pay a license fee of one thousand dollars. The attorney  
20 general shall deposit five hundred dollars of this fee into the charitable gaming

JB 2015

technology fund under section 53-06.1-12.4. A distributor shall apply annually for a license and pay a license fee of two thousand dollars. The attorney general shall deposit five hundred dollars of this fee into the charitable gaming technology fund under section 53-06.1-12.4. Application must be made before the first day of April in each year on a form prescribed by the attorney general.

2. A licensed distributor may not sell, market, or distribute gaming equipment except to a licensed distributor, licensed organization, organization that has a permit, or other person authorized by gaming rule or the attorney general. A manufacturer of a pull tab dispensing device, pull tab, ~~electronic pull tab device~~, bingo card marking device, bingo card, or fifty-fifty raffle system may only sell, market, or distribute the manufacturer's pull tab dispensing device ~~and processing chip encoded with proprietary software~~, pull tab, ~~electronic pull tab device~~, bingo card marking device, bingo card, or fifty-fifty raffle system to a licensed distributor. A manufacturer of an electronic pull tab device, electronic quick shot bingo system or device, or other electronic gaming device may sell, market, or distribute the manufacturer's electronic pull tab device, electronic quick shot bingo system or device, or other electronic gaming device to a licensed distributor or licensed organization. A licensed distributor may purchase or acquire a pull tab dispensing device and processing chip encoded with proprietary software, pull tab, electronic pull tab device, bingo card marking device, bingo card, ~~or~~ fifty-fifty raffle system, or other electronic gaming device only from a licensed manufacturer or licensed distributor. However, a distributor may purchase or acquire a used pull tab dispensing device or electronic pull tab device from a licensed organization. A distributor may not duplicate a manufacturer's processing chip encoded with proprietary software. No gaming equipment or prize may be sold or leased at an excessive price.

3. A licensed distributor shall affix a North Dakota gaming stamp to each deal of paper pull tabs, raffle board, punchboard, sports pool board, calcutta board, and series of paddlewheel ticket cards sold or otherwise provided to a licensed organization or organization that has a permit and shall purchase the stamps from the attorney general for thirty-five cents each. Ten cents of each stamp sold by the attorney general, up to thirty-six thousand dollars per biennium, must be credited to the



Jim 305

attorney general's operating fund to defray the costs of issuing and administering the gaming stamps. If an organization hosts an event with a raffle board and only sells numbered squares on the day of event, the organization is exempt from the requirements under this subsection.

4. A licensed organization, organization that has a permit, licensed manufacturer, or North Dakota wholesaler of liquor or alcoholic beverages may not be a distributor or stockholder of a distributor. A distributor may not be a stockholder of a manufacturer.
5. In addition to the license fee, the attorney general may require advance payment of any fee necessary to pay the cost of a record check of an applicant according to subdivision c of subsection 5 of section 53-06.1-06.
6. A licensed manufacturer may not refuse to sell deals of pull tabs, paper bingo cards, or gaming equipment to a licensed distributor unless:
  - a. A specific deal of pull tabs is sold on an exclusive basis;
  - b. The manufacturer does not sell deals of pull tabs, paper bingo cards, or gaming equipment to any distributor in the state;
  - c. A gaming law or rule prohibits the sale;
  - d. The distributor has not provided the manufacturer with proof of satisfactory credit or is delinquent on any payment owed to the manufacturer; or
  - e. The distributor has not met the manufacturer's standard minimum order quantity and freight terms.

7. A manufacturer may work directly with an licensed organization to ensure proper maintenance and address technical or software issues with an electronic pull tab device. A distributor or manufacturer of an electronic pull tab device shall notify a licensed organization of scheduled maintenance or repair and allow an organization to have a representative present when any maintenance or repair is performed.

**SECTION 2. AMENDMENT.** Subsection 11 of section 53-06.2-01 of the North Dakota Century Code is amended and reenacted as follows:

11. "Racing" means live or simulcast horse racing under the certificate system or simuleast dog racing under the certificate system.

**SECTION 3. AMENDMENT.** Section 53-06.2-07 of the North Dakota Century Code is amended and reenacted as follows:

JD 4/25/5

1       **53-06.2-07. Issuance of licenses - Applications.**

- 2       1. On compliance by an applicant with this chapter and the approval of the attorney  
3       general, the commission may issue a license to conduct races. The attorney general  
4       may not grant a license denied by the commission.
- 5       2. An application for a license to conduct a racing meet must be signed under oath and  
6       filed with the commission. The application must contain at least the following:
- 7       a. The name and post-office address of the applicant.
- 8       b. The location of the racetrack and whether it is owned or leased. If the racetrack is  
9       leased, a copy of the lease must be included.
- 10       c. A statement of the applicant's previous history and association sufficient to  
11       establish that the applicant is an eligible organization.
- 12       d. The time, place, and number of days the racing meet is proposed to be  
13       conducted.
- 14       e. ~~The type of racing to be conducted.~~
- 15       f. Other information the commission requires.
- 16       3. At least thirty days before the commission issues or renews a license to conduct  
17       races, the applicant shall deliver a complete copy of the application to the local  
18       jurisdiction governing body. The application to the commission must include a  
19       certificate verified by a representative of the applicant, indicating delivery of the  
20       application copy to the governing body. If the governing body of the local jurisdiction  
21       adopts a resolution disapproving the application for license or renewal and so informs  
22       the executive director within thirty days of receiving a copy of the application, the  
23       license to conduct races may not be issued or renewed.
- 24       4. A totalizator or service provider licensee may not use its license to offer bets or wagers  
25       on dog races.

26       **SECTION 4. AMENDMENT.** Section 53-06.2-10 of the North Dakota Century Code is  
27       amended and reenacted as follows:

28       **53-06.2-10. Certificate system - Rules.**

29       The certificate system allows a licensee to receive money from any person ~~present at~~ on a  
30       live horse race, ~~or simulcast horse race, or simulcast dog race~~ who desires to bet on any entry in  
31       that race. A person betting on an entry to win acquires an interest in the total money bet on all

Am 505

1 entries in the race, in proportion to the amount of money bet by that person, under rules  
2 adopted by the commission. The licensee shall receive the bets and for each bet on a live or  
3 simulcast horse race shall issue a certificate to the bettor on which is at least shown the number  
4 of the race, the amount bet, and the number or name of the entry selected by the bettor. The  
5 commission may adopt rules for place, show, quinella, combination, or other types of ~~betting~~  
6 usually connected with racingwagering on live or simulcast horse races.

7 **SECTION 5. EFFECTIVE DATE.** Sections 2, 3, and 4 of this Act become effective on  
8 August 1, 2027.

# 2025 SENATE STANDING COMMITTEE MINUTES

## Judiciary Committee Peace Garden Room, State Capitol

SB 2384  
2/11/2025

Relating to the authorized sale of electronic gaming devices by manufacturers and live or simulcast horse racing.

3:03 p.m. Chair Larson opened the hearing.

Members present:

Chair Larson, Vice Chairman Paulson, Senators: Castaneda, Cory, Luick, Braunberger.  
Senator Myrdal absent.

### Discussion Topics:

- Miscommunication in discussions
- Maintenance and repair by licensed organizations
- Committee action

3:03 p.m. Senator Cory moved to reconsider.

3:05 p.m. Senator Luick seconded.

Senators	Vote
Senator Diane Larson	Y
Senator Bob Paulson	Y
Senator Ryan Braunberger	Y
Senator Jose L. Castaneda	Y
Senator Claire Cory	Y
Senator Larry Luick	Y
Senator Janne Myrdal	A

Motion Passed 6-0-1.

3:06 p.m. Senator Cory introduced the amendment and submitted testimony #38362.

3:07 p.m. Senator Cory moved amendment LC# 25.1323.01002.

3:07 p.m. Senator Luick seconded.

3:12 p.m. Voice Vote - Motion Passed.

3:13 p.m. Senator Cory moved a Do Pass as amended and rerefer to Appropriations committee.

3:13 p.m. Senator Luick seconded the motion.

<b>Senators</b>	<b>Vote</b>
Senator Diane Larson	Y
Senator Bob Paulson	Y
Senator Ryan Braunberger	Y
Senator Jose L. Casteneda	Y
Senator Claire Cory	Y
Senator Larry Luick	Y
Senator Janne Myrdal	A

Motion Passed 6-0-1.

3:14 p.m. Senator Cory will carry the bill.

3:14 p.m. Chair Larson closed the hearing.

*Kendra McCann, Committee Clerk*



Sixty-ninth  
Legislative Assembly  
of North Dakota

**PROPOSED AMENDMENTS TO**

**SENATE BILL NO. 2384**

Introduced by

Senators Cory, Patten

Representatives Hagert, Meier

2-11-25  
JB 1085

1 A BILL for an Act to amend and reenact section 53-06.1-14, subsection 11 of section  
2 53-06.2-01, and sections 53-06.2-07 and 53-06.2-10 of the North Dakota Century Code, relating  
3 to the ~~authorized sale of electronic gaming devices by manufacturers and live or simulcast~~  
4 ~~horse racing~~ maintenance of electronic pull tab devices and the elimination of dog racing; and to  
5 provide an effective date.

6 **BE IT ENACTED BY THE LEGISLATIVE ASSEMBLY OF NORTH DAKOTA:**

7 **SECTION 1. AMENDMENT.** Section 53-06.1-14 of the North Dakota Century Code is  
8 amended and reenacted as follows:

9 **53-06.1-14. Distributors and manufacturers.**

10 1. A manufacturer of pull tabs, bingo cards, electronic quick shot bingo systems and  
11 devices, or bingo card marking devices shall apply annually for a license and pay a  
12 license fee of five thousand five hundred dollars. A manufacturer of electronic pull tab  
13 systems and devices shall apply annually for a license and pay a license fee of ten  
14 thousand dollars. The attorney general shall deposit one thousand five hundred dollars  
15 of these fees into the charitable gaming technology fund under section 53-06.1-12.4. A  
16 manufacturer of paper pull tab dispensing devices shall apply annually for a license  
17 and pay a license fee of one thousand five hundred dollars. The attorney general shall  
18 deposit five hundred dollars of this fee into the charitable gaming technology fund  
19 under section 53-06.1-12.4. A manufacturer of electronic raffle systems shall apply  
20 annually for a license and pay a license fee of one thousand dollars. The attorney

Ag 2015

1 general shall deposit five hundred dollars of this fee into the charitable gaming  
2 technology fund under section 53-06.1-12.4. A distributor shall apply annually for a  
3 license and pay a license fee of two thousand dollars. The attorney general shall  
4 deposit five hundred dollars of this fee into the charitable gaming technology fund  
5 under section 53-06.1-12.4. Application must be made before the first day of April in  
6 each year on a form prescribed by the attorney general.

7 2. A licensed distributor may not sell, market, or distribute gaming equipment except to a  
8 licensed distributor, licensed organization, organization that has a permit, or other  
9 person authorized by gaming rule or the attorney general. A manufacturer of a pull tab  
10 dispensing device, pull tab, electronic pull tab device, bingo card marking device,  
11 bingo card, or fifty-fifty raffle system may only sell, market, or distribute the  
12 manufacturer's pull tab dispensing device and processing chip encoded with  
13 proprietary software, pull tab, electronic pull tab device, bingo card marking device,  
14 bingo card, or fifty-fifty raffle system to a licensed distributor. ~~A manufacturer of an~~  
15 ~~electronic pull tab device, electronic quick shot bingo system or device, or other~~  
16 ~~electronic gaming device may sell, market, or distribute the manufacturer's electronic~~  
17 ~~pull tab device, electronic quick shot bingo system or device, or other electronic~~  
18 ~~gaming device to a licensed distributor or licensed organization.~~ A licensed distributor  
19 may purchase or acquire a pull tab dispensing device and processing chip encoded  
20 with proprietary software, pull tab, electronic pull tab device, bingo card marking  
21 device, bingo card, or fifty-fifty raffle system, ~~or other electronic gaming device~~ only  
22 from a licensed manufacturer or licensed distributor. However, a distributor may  
23 purchase or acquire a used pull tab dispensing device or electronic pull tab device  
24 from a licensed organization. A distributor may not duplicate a manufacturer's  
25 processing chip encoded with proprietary software. No gaming equipment or prize  
26 may be sold or leased at an excessive price.

27 3. A licensed distributor shall affix a North Dakota gaming stamp to each deal of ~~paper~~  
28 pull tabs, raffle board, punchboard, sports pool board, calcutta board, and series of  
29 paddlewheel ticket cards sold or otherwise provided to a licensed organization or  
30 organization that has a permit and shall purchase the stamps from the attorney  
31 general for thirty-five cents each. Ten cents of each stamp sold by the attorney



JB 3085

- 1 general, up to thirty-six thousand dollars per biennium, must be credited to the  
2 attorney general's operating fund to defray the costs of issuing and administering the  
3 gaming stamps. If an organization hosts an event with a raffle board and only sells  
4 numbered squares on the day of event, the organization is exempt from the  
5 requirements under this subsection.
- 6 4. A licensed organization, organization that has a permit, licensed manufacturer, or  
7 North Dakota wholesaler of liquor or alcoholic beverages may not be a distributor or  
8 stockholder of a distributor. A distributor may not be a stockholder of a manufacturer.
- 9 5. In addition to the license fee, the attorney general may require advance payment of  
10 any fee necessary to pay the cost of a record check of an applicant according to  
11 subdivision c of subsection 5 of section 53-06.1-06.
- 12 6. A licensed manufacturer may not refuse to sell deals of pull tabs, paper bingo cards, or  
13 gaming equipment to a licensed distributor unless:
- 14 a. A specific deal of pull tabs is sold on an exclusive basis;  
15 b. The manufacturer does not sell deals of pull tabs, paper bingo cards, or gaming  
16 equipment to any distributor in the state;  
17 c. A gaming law or rule prohibits the sale;  
18 d. The distributor has not provided the manufacturer with proof of satisfactory credit  
19 or is delinquent on any payment owed to the manufacturer; or  
20 e. The distributor has not met the manufacturer's standard minimum order quantity  
21 and freight terms.
- 22 7. A manufacturer may work directly with a licensed organization to ensure proper  
23 maintenance of and address technical or software issues with an electronic pull tab  
24 device. A distributor or manufacturer of an electronic pull tab device shall notify a  
25 licensed organization of scheduled maintenance or repair and allow an organization to  
26 have a representative present when any maintenance or repair is performed.

27 **SECTION 2. AMENDMENT.** Subsection 11 of section 53-06.2-01 of the North Dakota  
28 Century Code is amended and reenacted as follows:

- 29 11. "Racing" means live or simulcast horse racing under the certificate system or  
30 ~~simulcast dog racing under the certificate system.~~

JB 4 of 5

**SECTION 3. AMENDMENT.** Section 53-06.2-07 of the North Dakota Century Code is amended and reenacted as follows:

**53-06.2-07. Issuance of licenses - Applications.**

1. On compliance by an applicant with this chapter and the approval of the attorney general, the commission may issue a license to conduct races. The attorney general may not grant a license denied by the commission.
2. An application for a license to conduct a racing meet must be signed under oath and filed with the commission. The application must contain at least the following:
  - a. The name and post-office address of the applicant.
  - b. The location of the racetrack and whether it is owned or leased. If the racetrack is leased, a copy of the lease must be included.
  - c. A statement of the applicant's previous history and association sufficient to establish that the applicant is an eligible organization.
  - d. The time, place, and number of days the racing meet is proposed to be conducted.
  - e. ~~The type of racing to be conducted.~~
  - f. Other information the commission requires.
3. At least thirty days before the commission issues or renews a license to conduct races, the applicant shall deliver a complete copy of the application to the local jurisdiction governing body. The application to the commission must include a certificate verified by a representative of the applicant, indicating delivery of the application copy to the governing body. If the governing body of the local jurisdiction adopts a resolution disapproving the application for license or renewal and so informs the executive director within thirty days of receiving a copy of the application, the license to conduct races may not be issued or renewed.
4. A totalizator or service provider licensee may not use its license to offer bets or wagers on dog races.

**SECTION 4. AMENDMENT.** Section 53-06.2-10 of the North Dakota Century Code is amended and reenacted as follows:

JB 5085

1       **53-06.2-10. Certificate system - Rules.**

2       The certificate system allows a licensee to receive money from any person ~~present at~~ on a  
3 ~~live horse race, or~~ simulcast horse race, ~~or simulcast dog race~~ who desires to bet on any entry in  
4 that race. A person betting on an entry to win acquires an interest in the total money bet on all  
5 entries in the race, in proportion to the amount of money bet by that person, under rules  
6 adopted by the commission. The licensee shall receive the bets and for each bet on a live or  
7 simulcast horse race shall issue a certificate to the bettor on which is at least shown the number  
8 of the race, the amount bet, and the number or name of the entry selected by the bettor. The  
9 commission may adopt rules for place, show, quinella, combination, or other types of ~~betting~~  
10 ~~usually connected with racing~~ wagering on live or simulcast horse races.

11       **SECTION 5. EFFECTIVE DATE.** Sections 2, 3, and 4 of this Act become effective on  
12 August 1, 2027.

**REPORT OF STANDING COMMITTEE  
SB 2384**

**Judiciary Committee (Sen. Larson, Chairman)** recommends **AMENDMENTS** ([25.1323.01002](#)) and when so amended, recommends **DO PASS** and **BE REREFERRED** to the **Appropriations Committee** (6 YEAS, 0 NAYS, 1 ABSENT AND NOT VOTING). SB 2384 was placed on the Sixth order on the calendar. This bill does not affect workforce development.



25.1323.01002  
Title.

Prepared by the Legislative Council  
staff for Senator Cory  
February 11, 2025

Sixty-ninth  
Legislative Assembly  
of North Dakota

## PROPOSED AMENDMENTS TO

### SENATE BILL NO. 2384

Introduced by

Senators Cory, Patten

Representatives Hagert, Meier

1 A BILL for an Act to amend and reenact section 53-06.1-14, subsection 11 of section  
2 53-06.2-01, and sections 53-06.2-07 and 53-06.2-10 of the North Dakota Century Code, relating  
3 to the ~~authorized sale of electronic gaming devices by manufacturers and live or simulcast~~  
4 ~~horse racing~~ maintenance of electronic pull tab devices and the elimination of dog racing; and to  
5 provide an effective date.

6 **BE IT ENACTED BY THE LEGISLATIVE ASSEMBLY OF NORTH DAKOTA:**

7 **SECTION 1. AMENDMENT.** Section 53-06.1-14 of the North Dakota Century Code is  
8 amended and reenacted as follows:

9 **53-06.1-14. Distributors and manufacturers.**

10 1. A manufacturer of pull tabs, bingo cards, electronic quick shot bingo systems and  
11 devices, or bingo card marking devices shall apply annually for a license and pay a  
12 license fee of five thousand five hundred dollars. A manufacturer of electronic pull tab  
13 systems and devices shall apply annually for a license and pay a license fee of ten  
14 thousand dollars. The attorney general shall deposit one thousand five hundred dollars  
15 of these fees into the charitable gaming technology fund under section 53-06.1-12.4. A  
16 manufacturer of paper pull tab dispensing devices shall apply annually for a license  
17 and pay a license fee of one thousand five hundred dollars. The attorney general shall  
18 deposit five hundred dollars of this fee into the charitable gaming technology fund  
19 under section 53-06.1-12.4. A manufacturer of electronic raffle systems shall apply  
20 annually for a license and pay a license fee of one thousand dollars. The attorney

1           general shall deposit five hundred dollars of this fee into the charitable gaming  
2           technology fund under section 53-06.1-12.4. A distributor shall apply annually for a  
3           license and pay a license fee of two thousand dollars. The attorney general shall  
4           deposit five hundred dollars of this fee into the charitable gaming technology fund  
5           under section 53-06.1-12.4. Application must be made before the first day of April in  
6           each year on a form prescribed by the attorney general.

7           2. A licensed distributor may not sell, market, or distribute gaming equipment except to a  
8           licensed distributor, licensed organization, organization that has a permit, or other  
9           person authorized by gaming rule or the attorney general. A manufacturer of a pull tab  
10          dispensing device, pull tab, electronic pull tab device, bingo card marking device,  
11          bingo card, or fifty-fifty raffle system may only sell, market, or distribute the  
12          manufacturer's pull tab dispensing device and processing chip encoded with  
13          proprietary software, pull tab, electronic pull tab device, bingo card marking device,  
14          bingo card, or fifty-fifty raffle system to a licensed distributor. ~~A manufacturer of an~~  
15          ~~electronic pull tab device, electronic quick shot bingo system or device, or other~~  
16          ~~electronic gaming device may sell, market, or distribute the manufacturer's electronic~~  
17          ~~pull tab device, electronic quick shot bingo system or device, or other electronic~~  
18          ~~gaming device to a licensed distributor or licensed organization.~~ A licensed distributor  
19          may purchase or acquire a pull tab dispensing device and processing chip encoded  
20          with proprietary software, pull tab, electronic pull tab device, bingo card marking  
21          device, bingo card, or fifty-fifty raffle system, ~~or other electronic gaming device~~ only  
22          from a licensed manufacturer or licensed distributor. However, a distributor may  
23          purchase or acquire a used pull tab dispensing device or electronic pull tab device  
24          from a licensed organization. A distributor may not duplicate a manufacturer's  
25          processing chip encoded with proprietary software. No gaming equipment or prize  
26          may be sold or leased at an excessive price.

27          3. A licensed distributor shall affix a North Dakota gaming stamp to each deal of ~~paper~~  
28          pull tabs, raffle board, punchboard, sports pool board, calcutta board, and series of  
29          paddlewheel ticket cards sold or otherwise provided to a licensed organization or  
30          organization that has a permit and shall purchase the stamps from the attorney  
31          general for thirty-five cents each. Ten cents of each stamp sold by the attorney



- 1           general, up to thirty-six thousand dollars per biennium, must be credited to the  
2           attorney general's operating fund to defray the costs of issuing and administering the  
3           gaming stamps. If an organization hosts an event with a raffle board and only sells  
4           numbered squares on the day of event, the organization is exempt from the  
5           requirements under this subsection.
- 6       4. A licensed organization, organization that has a permit, licensed manufacturer, or  
7       North Dakota wholesaler of liquor or alcoholic beverages may not be a distributor or  
8       stockholder of a distributor. A distributor may not be a stockholder of a manufacturer.
- 9       5. In addition to the license fee, the attorney general may require advance payment of  
10       any fee necessary to pay the cost of a record check of an applicant according to  
11       subdivision c of subsection 5 of section 53-06.1-06.
- 12       6. A licensed manufacturer may not refuse to sell deals of pull tabs, paper bingo cards, or  
13       gaming equipment to a licensed distributor unless:
- 14           a. A specific deal of pull tabs is sold on an exclusive basis;  
15           b. The manufacturer does not sell deals of pull tabs, paper bingo cards, or gaming  
16           equipment to any distributor in the state;  
17           c. A gaming law or rule prohibits the sale;  
18           d. The distributor has not provided the manufacturer with proof of satisfactory credit  
19           or is delinquent on any payment owed to the manufacturer; or  
20           e. The distributor has not met the manufacturer's standard minimum order quantity  
21           and freight terms.
- 22       7. A manufacturer may work directly with a licensed organization to ensure proper  
23       maintenance of and address technical or software issues with an electronic pull tab  
24       device. A distributor or manufacturer of an electronic pull tab device shall notify a  
25       licensed organization of scheduled maintenance or repair and allow an organization to  
26       have a representative present when any maintenance or repair is performed.

- 27       **SECTION 2. AMENDMENT.** Subsection 11 of section 53-06.2-01 of the North Dakota  
28       Century Code is amended and reenacted as follows:
- 29       11. "Racing" means live or simulcast horse racing under the certificate system ~~or~~  
30       ~~simulcast dog racing under the certificate system.~~



1       **SECTION 3. AMENDMENT.** Section 53-06.2-07 of the North Dakota Century Code is  
2 amended and reenacted as follows:

3       **53-06.2-07. Issuance of licenses - Applications.**

- 4       1. On compliance by an applicant with this chapter and the approval of the attorney  
5       general, the commission may issue a license to conduct races. The attorney general  
6       may not grant a license denied by the commission.
- 7       2. An application for a license to conduct a racing meet must be signed under oath and  
8       filed with the commission. The application must contain at least the following:
- 9       a. The name and post-office address of the applicant.
- 10       b. The location of the racetrack and whether it is owned or leased. If the racetrack is  
11       leased, a copy of the lease must be included.
- 12       c. A statement of the applicant's previous history and association sufficient to  
13       establish that the applicant is an eligible organization.
- 14       d. The time, place, and number of days the racing meet is proposed to be  
15       conducted.
- 16       e. ~~The type of racing to be conducted.~~
- 17       f. Other information the commission requires.
- 18       3. At least thirty days before the commission issues or renews a license to conduct  
19       races, the applicant shall deliver a complete copy of the application to the local  
20       jurisdiction governing body. The application to the commission must include a  
21       certificate verified by a representative of the applicant, indicating delivery of the  
22       application copy to the governing body. If the governing body of the local jurisdiction  
23       adopts a resolution disapproving the application for license or renewal and so informs  
24       the executive director within thirty days of receiving a copy of the application, the  
25       license to conduct races may not be issued or renewed.
- 26       4. A totalizator or service provider licensee may not use its license to offer bets or wagers  
27       on dog races.

28       **SECTION 4. AMENDMENT.** Section 53-06.2-10 of the North Dakota Century Code is  
29 amended and reenacted as follows:

1       **53-06.2-10. Certificate system - Rules.**

2       The certificate system allows a licensee to receive money from any person ~~present at~~ on a  
3 ~~live horse race, or~~ simulcast horse race, ~~or simulcast dog race~~ who desires to bet on any entry in  
4 that race. A person betting on an entry to win acquires an interest in the total money bet on all  
5 entries in the race, in proportion to the amount of money bet by that person, under rules  
6 adopted by the commission. The licensee shall receive the bets and for each bet on a live or  
7 simulcast horse race shall issue a certificate to the bettor on which is at least shown the number  
8 of the race, the amount bet, and the number or name of the entry selected by the bettor. The  
9 commission may adopt rules for place, show, quinella, combination, or other types of ~~betting~~  
10 ~~usually connected with racing~~ wagering on live or simulcast horse races.

11       **SECTION 5. EFFECTIVE DATE.** Sections 2, 3, and 4 of this Act become effective on  
12 August 1, 2027.

**2025 HOUSE JUDICIARY**

**SB 2384**

# 2025 HOUSE STANDING COMMITTEE MINUTES

**Judiciary Committee**  
Room JW327B, State Capitol

SB 2384  
3/17/2025

Relating to the maintenance of electronic pull tab devices and the elimination of dog racing; and to provide an effective date.

9:58 a.m. Chairman Klemin opened the hearing.

Members Present: Chairman Klemin, Vice-Chairman Karls, Vice-Chairman Vetter, Representatives Christianson, Henderson, Hoverson, Johnston, McLeod, Satrom, Tveit, VanWinkle, Wolff, Schneider

## **Discussion Topics:**

- North Dakota horse racing industry
- Account Deposit Wagering
- Dog racing betting process
- Cartel involvement with North Dakota horse racing

10:00 a.m. Carey Theil, Executive Director of GREY2K USA, testified in favor and provided testimony #41604, #41655.

10:15 a.m. Senator Claire Cory, North Dakota Senator for District 42, introduced the bill and provided testimony #42311.

10:21 a.m. Mark Jorritsma, North Dakota Family Alliance Legislative Action, testified in favor and provided testimony #41870.

10:24 a.m. Deb McDaniel, Director of Charitable Gaming Division for the Office of the Attorney General, testified in favor.

10:27 a.m. Rory Goree, Former Arizona Racing Commissioner over Greyhound Racing, testified in favor and provided testimony #41633.

10:29 a.m. Jonathan Krutz, Board President of the Stop Predatory Gambling Foundation, testified in favor and provided testimony #41644.

10:32 a.m. Bruce Johnson, Executive Director of the North Dakota Racing Commission, testified in opposition and provided testimony #42331.

11:01 a.m. Scott Horst, President of the North Dakota Thoroughbred Association, testified in opposition and provided testimony #42038.

11:11 a.m. Craig Valnes, Lead Customer Service and Tech Support Agent for FPN Gaming, testified in opposition and provided testimony #42115.

11:14 a.m. William Garrett, Northland Gaming, testified in opposition and provided testimony #42131.

11:17 a.m. Lance Hagen, Western Distributing, testified in opposition.

11:27 a.m. Leigh Backhaus, Director of North Dakota Horse Park, testified in opposition.

11:32 a.m. Leslie Csokasy, Director of the National Greyhound Association testified in opposition and provided testimony #41694, #41695.

11:38 a.m. James Gartland, Executive Director of the National Greyhound Association, testified in opposition and provided testimony #41593.

11:41 a.m. Michael Weiss, President of PariBet LLC, testified in opposition and provided testimony #41585.

**Additional written testimony:**

In Favor:

#41696

In Opposition:

#41636, #41693, #41707, #41862, #41959, #41987, #42071, #42074, #42090, #42094, #41635, #41699, #42007

11:48 a.m. Chairman Klemin closed the hearing.

*Wyatt Armstrong, Committee Clerk*



1240 Coral Way, Singer Island, FL 33404

Members of the N Dakota Legislature;

I am Michael Weiss, President of PariBet LLC, an Advanced Deposit Wagering Company that has been licensed in North Dakota for 10 years. My wife, Patty and I recommend you **DO NOT PASS SB 2384**. This is the third attempt by a group from Massachusetts to slip verbiage into a bill making it illegal to wager on greyhound racing **regardless of jurisdiction** of said racing. This group's goal has no relation to the bill's primary purpose.

Racing is not just a Sport. Racing is a business that stretches from jockeys, to fans, veterinarians, farms and communities. Racing has a very strong impact on the economy, agriculture and so much more in the community in which it operates.

**PariBet, a family owned business, licensed in your state, has paid to the State of North Dakota over 5 million in tax dollars and has contributed another 1.5 million dollars in support of horsemen and the racetrack.** I do not understand how one group, without any ties or business in North Dakota, that does not care for Greyhound racing, can step into your State and submit a self-serving bill which manipulates the livelihoods of individuals and companies that have supported and contributed so much to your state's economy for decades. If this bill is passed as written, companies such as my own would be forced to either leave North Dakota or close. Either option will definitely send some of my employees to the unemployment line.

Also, I personally, have donated my time to reopen and manage the Fargo Racetrack (Horse Racing North Dakota), HRND. PariBet has created the "PRISE" PROGRAM (Paribet Racing Industry Student Experience - see brochure below.) in which my wife and I train and mentor University Students and help them find jobs and careers at our own expense. One student is your current racing manager, Hugh Drexler.

**My wife and I implore you DO NOT PASS SB 2384 which was introduced by a group who has had no ties to North Dakota racing and has contributed zero dollars to preserve racing of any kind or to enhance your communities in North Dakota.**

PariBet currently has customers that reside locally as well as internationally. There are countries in the world in which Greyhound racing is revered and highly regulated. Australia has 17 greyhound tracks. Ireland, for example, has a huge Greyhound celebration which includes the Irish Greyhound Derby. The Derby is a highly regulated event and a huge festival. People come from all over the world for the event. The bill, as written, would mean that my customers would not be able to wager in a legal, regulated international jurisdiction. My customers would move their business somewhere else, including the business they do with me in the horse industry worldwide.



My wife and I have enjoyed our years of being licensed in North Dakota. We support the State and Racing with our Tax and Charitable donations of not only monies, but our time. We are asking that the State we have supported not be a party to forcing us to move out of North Dakota.

Again, we respectfully recommend that **YOU DO NOT PASS SB 2384** as written.

Thank you,

Michael Weiss  
President, PariBet LLC  
(614) 496-8383



The students that saved the track.

11

## About PariBet

[www.pariбет.com](http://www.pariбет.com) Is a pari-mutuel ADW (advanced deposit wagering) service, providing legal and secure online account wagering for Horse and Greyhound racing with partner tracks from across the world. Pariбет LLC is licensed in the State of North Dakota, USA and is regulated by the North Dakota Racing Commission. All wagers placed through [pariбет.com](http://pariбет.com) are commingled with contracted and partnered host tracks pari-mutuel pools.

PariBet works to strengthen the racing industry through educational partnerships providing real world experience for students.

## Rillito Racetrack

Historic Rillito Racetrack, the birthplace of Quarter Horse Breeding and Racing, opened in 1943. It is listed in the National Registry of Historic Places. The Rillito Park Foundation is a non-profit organization founded by area businessmen desiring to save the track along with the adjacent Jelks Stud Farm.

The Foundation hired PariBet's Michael Weiss to bring his expertise to this endeavor. They have been working together for the past five years. Successful continuance of racing and turning the Jelks Farm into a museum that will enhance the experiences of both citizens and visitors to Tucson is the Foundation's focus.

*"A big thank you to Mike Weiss of Rillito Park and PariBet and to Rillito Park Foundation for all they are doing to change the lives of students from The University of Arizona College of Agriculture and Life Sciences."*

-- Dr. Shane Burgess

Vice President and Charles-Sander Dean Agriculture, Life and Veterinary Sciences, and Cooperative Extension  
The University of Arizona

## **P.R.I.S.E. Program**

PariBet Racing Industry Student Experience (P.R.I.S.E.) was created by Michael Weiss, President of PariBet and RTIP Alum, as an educational outreach program. PRISE represents a partnership between PariBet, the Rillito Park Foundation, the University of Arizona College of Agriculture and Life Sciences and its RaceTrack Industry Program. Through this program, internship positions have been created at Rillito Park Racetrack in Tucson, Arizona. Students interested in working at a racetrack get hands on, in the trenches experience working in the racing office, media centers, mutuels, hospitality, admissions and management. Every aspect involving creating the racetrack experience for racing fans is handled by the interns in the PRISE program. Students receive payment during their internship as well as college credit toward their degree.

A new program, Equine Wellness, is being developed by the PRISE program. The Track Veterinarian and Stewards are working with College of Agriculture and Life Sciences students not involved through the RTIP. One goal is to educate trainers in equine nutrition and new training methods. Another is to develop a program which will be used to evaluate the soundness and health of the horses participating in the race meet. Ultimately, the goal is to enhance the health of the athletes and protect the integrity of the sport.

PRISE program interns have been highlighted in the Paulick Reports. A "must read" among racing industry members and fans. Bios can be found at **[www.paulickreport.com/features/racing-industry-student-experience](http://www.paulickreport.com/features/racing-industry-student-experience)**. Also look for the "Where are They Now" features on P.R.I.S.E. participants.

PariBet, through its connections in the racing industry, has also been instrumental in helping graduating students find full time employment and undergrads find internships. Past students mentoring at PRISE have been placed in strong leadership positions in Breeding Farms, Tote Companies, The New York Jockey Club and top racetracks.

## **PariBet Gives Back!**

Other projects include working with the North Dakota Racing Commission to manage the North Dakota Horse Park. In 2012, live racing returned to Fargo, North Dakota, after a two-year absence. Michael Weiss, from PariBet, was instrumental in reopening the successful live meet, which has continued to run each July.

PariBet, to date, has given contributions exceeding \$5,000,000 and hundreds of man hours back to the industry. PariBet's contributions support live racing, the P.R.I.S.E. student program, Thoroughbred and

Quarter Horse Associations, student scholarships, and a partnership with World Breeders Cup Championships, Breeds funds and racing promotion funds as well as Disabled Jockeys.

## **University of Arizona**

### **College of Agriculture**

### **and Life Sciences**

The shining jewel of the College of Agriculture & Life Sciences at the University of Arizona is the Race Track Industry Program (RTIP). Established in 1970, the program educates the future leaders of the racetrack industry.

Many of the RTIP Alumni are current luminaries in the industry including two-time triple crown winning trainer, Bob Baffert. P.R.I.S.E students have proven to become the racing industry's future. They help to run Rillito Racetrack by participating in active roles such as: Assistant General Manager, placing judge, photo finish operator, TV graphics, racing office, handicappers, program development, social media, outriding and much more. This experience has prepared them to take active roles in moving racing into the future and exposing new and younger audiences to the sport.





March 14, 2025

North Dakota House, House Committee on Judiciary and SB2384

On behalf of the National Greyhound Association membership and racing fans across the United States, we respectfully urge you to oppose SB2384 which, among other things, bans wagering on simulcast greyhound racing.

Like many forms of gambling, wagering moved to online platforms and in small business off track betting establishments. These wagers assist in offsetting general funds and governmental regulatory commissions.

This bill would eliminate wagering on a single parimutuel activity that doesn't occur within the state. Racing is heavily regulated by individual state commissions and operates with transparency to protect the racing animals racing and the integrity of the sport.

The NATIONAL GREYHOUND ASSOCIATION takes great pride in being stewards of the greyhound breed.

**INNOVATIVE IN HUMANE STEWARDSHIP.** In 2014, the National Greyhound Association (NGA) expanded its bylaws to include a humane welfare mandate to encompass **all animals** in the care of members, *regardless of breed or species*. Nationwide, The NGA has 33 inspectors and routinely inspects member farms. The NGA has a policy discouraging NGA registered greyhounds from being exported into counties without recognized welfare standards, structured around strong legislation. Any member found guilty of beating, overworking or mistreating a dog – or any animal – will face a lifetime ban from owning any greyhound, working in the industry and no member in good standing may do business with an expelled individual.

**MORE GENEROUS THAN HSUS STANDARDS OF CARE.** The condo style crates that the greyhounds call home are larger than the average crate found in the pet home. In fact, their size exceeds the minimum requirements deemed humane by the HSUS.



Track greyhounds have a staff averaging 4 individuals per kennel business who turn them out multiple times a day, and oversee their daily care, exercise and enrichment. These kennel businesses are inspected weekly by track officials and state boards to ensure that their care is exceptional. An under conditioned or malnourished greyhound will not be permitted to race and maybe impounded by the track veterinarian or steward.

**LEADERS IN PET ADOPTION.** The NGA maintain a 98.75% adoption rate for adoptable greyhounds post career & those that are not competitive at an early age. In fact, many adoption groups are experiencing waitlists of a year or more. Some greyhounds are also retained for breeding or kept as pets by their race owner.

The American Greyhound Council (AGC), a collaborative effort of the NGA, has contributed more than \$3.1 million directly to adoption efforts, and continues to contribute on a regular basis. About 8% of annual allocated donations continues to go to National adoption groups. This does not include track and individual owner contributions.

**NOT OVER-BREEDING. RIGHTSIZING.** Due to fewer national tracks to supply, the NGA acknowledges a 62% downsizing in individual puppies registered from 2010-2020.

NGA greyhounds spend, on average, 2-3 years racing, and then retire as couch potatoes in pre-screened homes. An NGA greyhound will live to be 12-14 years old.

Again, US greyhound specific adoption centers report waitlists of over 1 year for retiring greyhounds.

**MINIMAL RISK, ADVOCATING FOR SAFETY FIRST** Greyhound racing's injury risk is less than 1%. According to official reports from WV state track veterinarians obtained from the Racing Commission, the most common injuries are sprains, muscle strains, webbing splits and lacerations. 78% of injuries were minor and the canine athletes returned to race after rest and care. Any greyhound sustaining a career ending incident was seen medically by a licensed veterinarian and placed into homes as a companion pets.

**RENEWED INTEREST.** While on track attendance and onsite wagering has dropped, overall wagering in West Virginia has seen tremendous growth. Compared to 2019, wagering on WV racing increased from \$124.8 million to \$359 million, or a 187% increase. Much of this increase runs thru North Dakota ADWs and are taxed accordingly.

The NGA has seen a sharp increase in interest and membership diversity. In the first two months of 2024, the National Greyhound Association has had a 15% increase in membership applications and anticipate doubling membership overall for the year.

The NGA and the greyhounds respectfully asks you to vote no on SB2384.

Sincerely,

James Gartland  
National Greyhound Association



# NORTH DAKOTA IS PROPPING UP FOREIGN DOG TRACKS SUPPORT SB 2384

## COMMERCIAL GREYHOUND RACING IS HALLMARKED BY UNSAVORY ACTORS

- Racing greyhounds have tested positive for cocaine, amphetamines, and other illicit drugs.
- In 2022, the former head of a state greyhound association was imprisoned for conspiracy to provide illegal substances to kennel operators in multiple states.
- A cartel-linked Mexican track owner used North Dakota ADW hubs to process bets at his Tijuana dog track for years, only ending with its closure in 2024.

## QUESTIONABLE REGULATION BY FOREIGN GOVERNMENTS

- American greyhound breeders were caught exporting greyhounds to participate in illegal dog races in China.
- Greyhound racing is in decline in the US, the UK and around the world, and has ended in Vietnam. The Conservative Government of New Zealand has just ordered a phase-out of the industry by 2026, citing persistent humane and regulatory issues.

## THE STATE GETS NEXT TO NOTHING FROM GREYHOUND BETS

- Bets on greyhound races processed by North Dakota ADW hubs only generate approximately \$145,000 in tax revenue each year, split among five different state funds.
- Less than 1% of bets placed on dog racing that are processed through the North Dakota ADW hubs were from state residents, according to the Racing Commission.
- Any negligible financial impact can be mitigated by phasing out dog race bets, as has already become the law in Arizona and New Hampshire.

## CONSERVATIVE SUPPORT TO HELP GREYHOUNDS

- Campaigns to end dog racing have been championed by conservative luminaries such as Lara Trump, Attorney General Pam Bondi and Senator Rick Scott.
- Polling conducted in 2023 by Thirty-Ninth Street Strategies found that 75% of North Dakotans oppose allowing foreign dog tracks to use North Dakota to process dog bets.

### North Dakota Monitor

#### ANIMAL ADVOCACY GROUP HOPES DOG RACE BETTING IS ON ITS LAST LEGS IN NORTH DAKOTA

MICHAEL ACHTERLING  
Published Jun 24, 2024 | 6:42 AM

BISMARCK, N.D. (North Dakota Monitor) — A national greyhound advocacy nonprofit is urging North Dakota lawmakers to eliminate betting on remote, out-of-state dog races.

North Dakota and Oregon are the only two states that allow gambling companies to process advance-deposit wagering (ADW) bets on greyhound racing, making North Dakota a "hub" for online dog race wagering, said Carey Theil, executive director for GREY2K USA Worldwide.

"Live greyhound racing is not legal in North Dakota, so I do think it's odd that this is happening," Theil told *the Wednesday*. "A lot of the betting that is going through both Oregon and

### jacksonville.com

#### 12 GREYHOUNDS TEST POSITIVE FOR COCAINE AT BESTBET RACE TRACK IN ORANGE PARK

First Coast News  
Published 6:51 a.m. June 30, 2017

A local greyhound trainer's license has been suspended after 12 dogs in his care tested positive for cocaine.

According to records obtained by First Coast News, the dogs, all racers at Bestbet Orange Park, tested positive for Benzoylcegonine (BZE) — a metabolite of cocaine.

was carefully followed under state law. The bottom line is, the system worked."

Carey Theil disagrees. "The track tells the public the dogs are 'well taken care of at our facility; We're making sure everything is fine.' So they can't have to

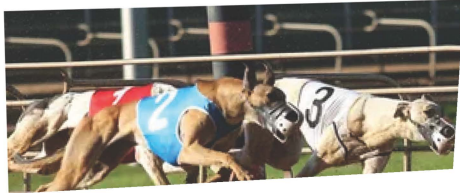
# Des Moines Register

## Greyhound racing is illegal in China. So why were the dogs of Iowa's top breeders being sold there?

After questions from the Reader's Watch groups ban the sale of U.S. greyhounds

Lee Rood

Published 11:35 a.m. April 23, 2019



# AP

## GREYHOUND RACING IS INCREASINGLY RARE WORLDWIDE. NEW ZEALAND NOW PLANS TO OUTLAW THE PRACTICE

CHARLOTTE GRAHAM-McLAY

Published 9:40 PM EST, December 10, 2024

Wellington, New Zealand AP — New Zealand plans to outlaw greyhound racing because too many dogs are hurt or killed, the government said.

and racing because too many dogs are hurt in one of the few countries where it still

last century. But the number of dogs for them after their short careers end, the sport.

the UK and Ireland, with only two tracks

government plans to stop the racing more than 1,000 people employed in the

cent years over its dog safety record, it made progress — but not enough.

grams that send retired New Zealanders have reduced the numbers killed, the said.

# BROWARD PALM BEACH New Times

## BROWARD NEWS

## Are Greyhound Track Owners in Business With a Mexican Cartel Financier?

Michael J. Moore  
Published May

Earlier this year, the Kennel Club, too

At the AGTOA's group's "newes

MIR/Caliente is Tijuana. The majority of everything from "Genghis Hank

A New York State enforcement and particularly with

He's also one of the cheetahs escaped the injured and

## IOWA CAPITAL DISPATCH



## FORMER HEAD OF IOWA GREYHOUND ASSOCIATION SENTENCED TO 15 MONTHS IN PRISON

Clark Kauffman

Published August 1, 2022 1:17 p.m.



The former head of the Iowa Greyhound Association is now facing 15 months in prison for crimes related to the distribution of drugs. (Photo by Getty Images)



# 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.



## 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.



Members of the committee.

My name is Rory S. Goree', and I have had the privilege of serving as a member and leader of the greyhound adoption community for many years, in addition to my role as an Arizona Racing Commissioner for over a decade. Today, I stand before you in strong support of Senate Bill 2384.

The reality is that greyhound racing is a thing of the past. This industry has been on a steady decline for years, and the tracks are no longer profitable. The market has shifted, and as people's interest in greyhound racing continues to dwindle, those who still want to place bets will simply shift their attention to horse racing. This transition is inevitable and reflects the changing landscape of the racing industry.

As a former Racing Commissioner, I've witnessed firsthand the struggles of greyhound racing in Arizona. More importantly, I've also seen the greyhound community's failure to always meet the highest standards of welfare and regulation. A few years ago, we learned the hard truth when members of the greyhound community were caught training with live bait, a practice that is both inhumane and illegal. This moment highlighted just how much oversight is needed, and frankly, it raised serious concerns about whether the greyhound industry is fully complying with the laws meant to protect these animals.

It's clear that greyhound racing no longer serves the best interests of these animals, and the concerns over their well-being persist. The practice of racing greyhounds is out of step with our values as a society, and it's time for us to embrace a future where we prioritize animal welfare, public health, and the shifting trends in sports betting.

By supporting SB 2384, we are making a bold statement that North Dakota is ready to move forward. We are supporting a future where we can invest in alternatives that are both economically viable and ethically sound. Greyhound adoption efforts, like those I've been involved with, will only continue to grow and flourish as more communities choose to focus on helping these dogs find loving homes instead of supporting an outdated and declining industry.

I urge you to support SB 2384. Let's be a part of the solution, not the problem. Thank you.



13011 W. Highway 42, Suite 107  
Prospect, KY 40059, USA  
Office: (502) 292-1075 Fax: (502) 292-1076

March 14, 2025

Subject: Letter in Opposition to Senate Bill 2384

Dear Members of the North Dakota Legislature,

AmWest Entertainment, LLC has been processing pari-mutuel wagers on horse and greyhound racing for over twenty-one years. We are the largest independent Advance Deposit Wagering (ADW) company in the North American market. Originally, we were an operator of off-track betting facilities and shifted to online wagering ([www.AmWager.com](http://www.AmWager.com)) as customer and market preferences changed.

Proudly, in 2024 we received licensure from the North Dakota Racing Commission as an ADW to accept wagers from residents from inside and outside the State of North Dakota on horse and greyhound racing.

We are writing in opposition to SB2384.

#### **SB2384**

Regardless of where the customer lives, an ADW customer's wagers are considered North Dakota wagers. SB2384 intends to ban wagering on Greyhound racing by all our customers and all residents of North Dakota. While there are only two remaining greyhound tracks in the US that operate live racing, there are many tracks worldwide that offer the sport. Our clientele enjoys the sport of greyhound racing and wagering on it. On any given day, over 10% of our wagering is done on greyhound racing. Many of our customers wager on greyhound racing exclusively, and another significant portion of our customer base makes most of their wagers on greyhound races and a much smaller amount on horse racing.

Even though there is no live greyhound racing in North Dakota, wagering on the sport of greyhound racing supports live horse racing in the state. The fees in which all ADW operators pay go to support horse racing prize money known as "purse money", breeding funds, and to the Racing Commission.

If SB2384 becomes law, ADWs would lose a significant amount of customers. The cohort of customers who wager all or a predominant amount of their money on greyhound racing will disappear and the horse racing industry in North Dakota would be left hurting, dealing with the unnecessary negative financial consequences.



13011 W. Highway 42, Suite 107  
Prospect, KY 40059, USA  
Office: (502) 292-1075 Fax: (502) 292-1076

We urge you to support the farmers and horsemen of North Dakota by opposing SB2384. It is harmful to the economy and residents of North Dakota.

Thank you for the opportunity to provide this testimony.

Yours Truly

A handwritten signature in black ink, appearing to read "Nelson Clemmens", written in a cursive style.

Nelson Clemmens

Founder & CEO  
AmWest Entertainment, LLC

**SB 2384**  
**House Judiciary Committee**  
**Submitted by Don Santer for NDAD**  
**03/17/2025**

Chairman Klemin and Committee Members,

Thank you for the opportunity to provide information regarding the charitable gaming industry of North Dakota. My name is Don Santer, representing the North Dakota Association for the Disabled (NDAD). For 50 years, NDAD has been dedicated to improving the quality of life for persons with disabilities and health challenges across North Dakota. NDAD is **Opposed** to **SB 2384**.

NDAD is a non-profit, charitable organization serving individuals with health concerns and disabilities throughout the state from our six locations in Bismarck, Dickinson, Fargo, Grand Forks, Minot, and Williston. In 2024, NDAD assisted thousands of North Dakota residents with more than **\$2.23 million** in services and resources that may have been otherwise unavailable to them. We work diligently to avoid duplicating services provided by other state or local entities, making us a crucial last resort for many individuals. For your convenience and information, I have attached our annual report to the end of this testimony.

The services provided by NDAD are not just beneficial but essential for improving the lives of people with disabilities and health challenges. They offer the support needed to overcome barriers, achieve personal goals, and live fulfilling lives. Funds raised through charitable gaming help ensure access to these services and create an environment that allows greater participation in everyday activities that most people take for granted.

**SB 2384** was an attempt by out-of-state manufacturers trying to capture larger shares of the revenue from charitable gaming in North Dakota. Our local distributors provide essential jobs and services to charities and should not be excluded. Charities rely on these local service providers not just for bingo cards and pull tabs, but also for maintaining all gaming equipment, including electronic gaming devices. Quick service is crucial, and our local distributors offer almost 24/7 support, which an out-of-state manufacturer may not provide.

Although this bill was amended to take out the direct sales to charities, we are still concerned the manufacturers will use the opportunities this bill will afford them to have one-on-one communications with site owners in an attempt to influence game choice and undermining relationships with the existing charity and the local distributor. Our local distributors are vital to the economy, providing jobs and services. Eliminating them will lead to job losses and negatively impact the local economy.

NDAD stands behind **North Dakota-based** gaming distributors. SB 2384 can significantly harm local distributors and the charities they serve. It is crucial to consider these potential consequences and ensure that any changes do not harm the local economy or limit options for charities.

NDAD respectfully asks for a **Do Not Pass** recommendation on **SB 2384**.

Thank you, Chairman Klemin and members of the committee. Please feel free to contact me with any questions or concerns.

Respectfully,

Don Santer, NDAD  
[dsanter@ndad.org](mailto:dsanter@ndad.org)



# Enhancing Our Impact

## 2024 Annual Report

### Our Purpose

NDAD (the North Dakota Association for the Disabled) is a nonprofit, charitable organization that assists people with health challenges in North Dakota. Our mission is to enhance the quality of lives of individuals facing health challenges.

### Who We Help

Here are a few people from each of our regions who have shared their NDAD story with us. See all at [ndad.org](https://ndad.org).



#### Kristi Dilger

(Bismarck)

Condition: Juvenile  
Rheumatoid Arthritis

**How NDAD helped:**  
Medical Equipment



#### Anne Compton

(Grand Forks)

Condition: Parkinson's  
Disease

**How NDAD helped:**  
Community Fundraiser



#### Roger Wilson

(Dickinson)

Condition: Lymphoma

**How NDAD helped:**  
Prescription Assistance  
Medical Travel, Lodging



#### Lynette Deaver

Condition: Anxiety,  
Depression, Arthritis

#### Larry Hanson

Condition: Anxiety,  
Depression, Epilepsy  
(Minot)

**How NDAD helped:**  
Paratransit Assistance



#### Greg Lane

(Fargo)

Condition: Diabetes, Chronic  
Kidney Disease, Coronary  
Artery Disease

**How NDAD helped:**  
Prescription Assistance,  
Equipment, Paratransit  
Assistance



#### Geno Williams

(Williston)

Condition: Autism

**How NDAD helped:**  
Adaptive Recreation  
Assistance

# Community Impact

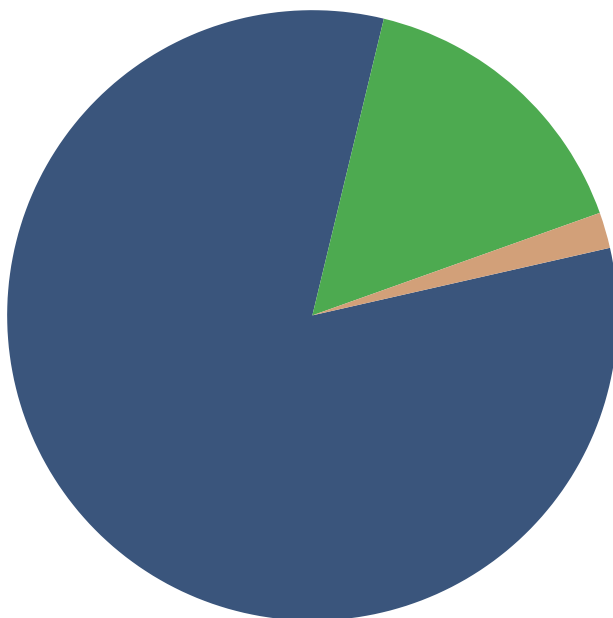
- Direct Financial Assistance
  - Prescription Medication
  - Medical Equipment & Supplies
  - Medical Travel
  - Accessibility & Paratransit
- Healthcare Equipment Loan Program
- Adaptive Recreation Events & Activities
- Community Fundraising Projects
- Organ Transplant Fund
- Information, Referral and Advocacy

To read more about these programs, visit [ndad.org](https://ndad.org)

## 2024 at a Glance

- Loaned **5,424 pieces of medical equipment** to **2,940 individuals** saving North Dakota residents **over \$664,040**
- **6,121 prescriptions** filled
- **2,134 medical trips** funded
- Purchased **328 pieces of medical equipment** and **567 medical supplies**
- **Wheelchair-accessible van** loaned to 126 individuals **for 246 trips**.
- Funds totaling **\$100,050 awarded to 24 organizations** to either assist individuals with disabilities or those otherwise at risk
- **8,049 accessible rides** funded for employment, shopping, and community events
- **4,465 hours** personal attendant care, respite care provided
- **50,665 interactions made**, such as phone calls, emails and other communication

## Financial Impact\*



**82.4%**

Program  
Services

\$2,235,103

**15.8 %**

Management &  
General

\$428,292

**1.9%**

Fundraising

\$53,248

## Testimony in support of Senate Bill 2384

Jonathan Krutz, National Board President  
Stop Predatory Gambling Foundation  
March 17, 2025

Dear Chair Klemin and honorable members of the House Judiciary Committee:

The Stop Predatory Gambling Foundation offers testimony in support of Senate Bill 2384.

Our national organization provides education on the negative impacts of products whose profits depend on exploiting people who are prone to gambling addiction. Online gambling such as advance-deposit wagering on dog racing is one such product.

Gambling addiction is recognized by the American Psychiatric Association<sup>1</sup> as on par with addictions to heroine, meth, cocaine, and opioids. Gambling addiction leads to higher suicide rates<sup>2</sup> than any of the substance abuse addictions.

Online forms of gambling, instantly available 24-7 on cell phones, remove time and geography limits on gambling activities, making such activities an irresistible temptation to the addiction-prone.

Online gambling has been shown by studies in Alberta,<sup>3</sup> Connecticut,<sup>4</sup> and New Jersey,<sup>5</sup> to receive more than 80 percent of its revenue from gamblers who meet one or more gambling addiction criteria.

This bill removes online simulcast dog racing from North Dakota law and further specifies that bets or wagers on dog races may not be offered. For this reason, we are testifying in favor of Senate Bill 2384.

Thank you for your consideration. Please reach out to us if you have any questions.

**Jonathan Krutz**, PhD, MBA, National Board President  
Stop Predatory Gambling Foundation & Campaign for Gambling-Free Kids  
100 Maryland Avenue NE, Room 310 | Washington, DC 20002  
jonathankrutz@boisestate.edu  
M: 208-841-1897 | [stoppredatorygambling.org](https://stoppredatorygambling.org) & [gamblingfreekids.org](https://gamblingfreekids.org)

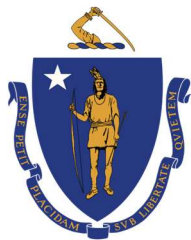
<sup>1</sup> American Psychiatric Association, Diagnostic and Statistical Manual of Mental Disorders (DSM-5), 2023  
<https://www.psychiatry.org/patients-families/gambling-disorder/what-is-gambling-disorder>

<sup>2</sup> Manning V, Koh PK, Yang Y, Ng A, Guo S, Kandasami G, et al. Suicidal ideation and lifetime attempts in substance and gambling disorders. *Psychiatry Res.* (2015) 225:706–9.

<sup>3</sup> Williams, R. J., Belanger, Y., & Arthur, J. (2011). *Gambling in Alberta: History, Current Status and Socioeconomic Impacts*. Alberta Gaming Research Institute (p 110). <https://prism.ucalgary.ca/bitstreams/14831e8c-cd5f-427e-937c-4e9ea1ebc522/download>

<sup>4</sup> Gemini Research. (2024). Impacts of Legalized Gambling in Connecticut. Report commissioned by the Connecticut Department of Mental Health and Addiction Services (DMHAS), January 2024 (p 20).  
<https://portal.ct.gov/-/media/DMHAS/Publications/2023-CT-FINAL-REPORT-Jan312024.pdf>

<sup>5</sup> <https://straighttothepoint.substack.com/p/pulling-back-the-vip-curtain>



THE COMMONWEALTH OF MASSACHUSETTS  
OFFICE OF THE ATTORNEY GENERAL

ONE ASHBURTON PLACE  
BOSTON, MASSACHUSETTS 02108

ANDREA JOY CAMPBELL  
ATTORNEY GENERAL

(617) 727-2200  
[www.mass.gov/ago](http://www.mass.gov/ago)

**DIRECTIVE TO CEASE AND DESIST**

March 14, 2025

**VIA CERTIFIED MAIL**  
**RETURN RECEIPT REQUESTED**  
**AND E-MAIL**

LIEN GAMES RACING LLC  
D/B/A RACEBETWIN.COM & OFFTRACKBETTING.COM  
Attn: Compliance Department

404 4<sup>th</sup> Ave. N., Suite 201  
Fargo, ND 58102-4844  
[compliance@liengamesracing.com](mailto:compliance@liengamesracing.com)

**AND**

P.O. Box 1029  
Fargo, ND 58107-1029

**Re: Unlicensed & Prohibited Dog Race Wagering**

Dear Lien Games Racing LLC:

Please be advised that the Office of the Attorney General for the Commonwealth of Massachusetts ("AGO") has become aware that your company, Lien Games Racing LLC ("You" or "Lien Games Racing"), may currently be or may have recently been engaged in the business of offering wagers on dog races to Massachusetts residents. Accordingly, the AGO directs You to immediately cease and desist from offering any wagers on dog races to Massachusetts residents, as these activities are in direct violation of Massachusetts law.

It is illegal in Massachusetts to engage in commercial gambling except where expressly authorized by the Commonwealth. See Massachusetts General Laws ("G.L.") c. 4, sec. 7 (definition of "illegal gaming"); G. L. c. 23K. Lien Games Racing appears to offer prohibited Advanced Deposit Wagering ("ADW") and/or simulcast wagers on dog races to Massachusetts residents on two of its websites, *RaceBetWin.com* and *OffTrackBetting.com*, and further appears to operate and/or promote ADW and/or simulcast wagers on prohibited dog races to

Massachusetts residents via the *PlayUp.com* racebook (collectively referred to hereafter as the “Websites”).

ADW offerings for dog races are not permitted under Massachusetts law and have not been permitted since 2010. See G.L. c. 128A, sec. 14E, which provides that “all other provisions of this Chapter shall be construed as if they contain no references to dogs, dog racing or dog races.” In addition, even if such ADW offerings were permitted by law, only licensed operators would be able offer them. G.L. c. 128A, sec. 5C. Lien Games Racing does not have a license issued by the Massachusetts Gaming Commission and, therefore, could not lawfully offer ADW on dog racing even if it were permitted.

Massachusetts law further expressly prohibits simulcast transmissions and simulcast wagering on dog racing in the Commonwealth. See G.L. c. 128C, sec. 9. Accordingly, Lien Games Racing may not transmit simulcasts of out-of-state races to Massachusetts residents.

Offering illegal gambling services constitutes an unfair and deceptive trade practice under the Massachusetts Consumer Protection Act, G.L. c. 93A. Any business that “induces consumers to participate in illegal and unregulated forms of gambling by posing as a legitimate business or claiming to offer legitimate sales transactions” is engaged in unfair and deceptive practices. 940 Code Mass. Regs. § 30.01.

You are hereby directed to immediately cease and desist from offering dog race wagers to Massachusetts residents through the Websites or through any other platforms accessible within the Commonwealth. Provide written confirmation within ten (10) business days of your receipt of this letter that You have complied with these directives.

Failure to comply with the terms outlined in this demand may result in legal enforcement action seeking injunctive relief, civil penalties of up to \$5,000 per violation, and costs of the investigation and litigation.

Lien Games Racing LLC  
March 14, 2025  
Page 3 of 3

Please direct any correspondence or confirmation of compliance to my attention at the address listed below.

Sincerely,

/s/ Joshua R. Edlin

Joshua R. Edlin  
*Assistant Attorney General*  
MASSACHUSETTS OFFICE OF THE  
ATTORNEY GENERAL  
Gaming Enforcement Division  
Civil Enforcement Unit  
One Ashburton Place, 18<sup>th</sup> Floor  
Boston MA 02108

cc:

PlayUp Interactive Inc. (d/b/a PlayUp.com)  
**Attn:** Legal Department  
**Mailing Address:** 304 S. Jones Blvd. #7070, Las Vegas, NV, 89107  
**Email:** [help@playupusa.com](mailto:help@playupusa.com)

Plainville Gaming and Redevelopment, LLC (d/b/a/ Plainridge Park Casino)  
**Attn:** Legal Department  
**Mailing Address:** 301 Washington St., Plainville, MA 02762

Todd Grossman, General Counsel, Mass. Gaming Commission (via email)





March 14, 2025

House Judiciary Committee  
State Capitol  
Bismarck, ND 58505

SB 2384----Do Not Pass

Dear Chairman Klemin and members of the Committee,

My name is Bill Breslo and I am the President of Diamond Game. We are a manufacturer of gaming equipment and have been doing business successfully in North Dakota since 2018.

We ask you to OPPOSE and vote DO NOT PASS on SB 2384.

While I understand this bill has been modified from an earlier version, it still represents a thinly-veiled attempt by ONE manufacturer in North Dakota to gain market share. In addition, it will lead to greater confusion for charities and manufacturers. The bill is not supported by the charities, other manufacturers, nor the gaming distributors in North Dakota. It should be defeated, because it represents bad policy for North Dakota. The current model (manufacturer to distributor to charitable organization) in North Dakota has worked successfully for decades and this bill does nothing to improve the model.

Please vote Do NOT Pass on SB 2384.

Sincerely,

*Bill Breslo*

Bill Breslo

President



## Vote No on SB2384

### 1. Greyhound Industry's Commitment to Welfare and Transparency

- Greyhound racing is **highly regulated** with strict oversight ensuring **canine welfare and safety**.
- Greyhound racing regulations are effective in identifying and dealing with violations related to conduct and greyhound care. **Allegations of cocaine were proved false and were dismissed.**
  - **Drug violations are very rare in the United States.** According to the West Virginia Racing Commission, they collect roughly 10,000 greyhound urine samples annually. In 2024, there was **ONE, single drug violation** in WV. It was for **caffeine**.
- Injury rates in greyhound racing are **exceptionally low** (99.5% of race starts occur without incident). State-employed veterinarians oversee rehabilitation and return-to-race protocols for injured dogs.
- The **National Greyhound Association (NGA)** enforces **zero tolerance for neglect or abuse**, permanently banning violators.
- The National Greyhound Association bans members from exporting greyhounds to countries without welfare standards.

### 2. Adoption & Life After Racing

- **100% of U.S. racing greyhounds are adopted** through endorsed programs.
- Retired greyhounds transition well into companion homes due to their structured upbringing. The industry actively supports **responsible breeding and lifetime placement** of all greyhounds.

### 3. Economic Impact on North Dakota

- In **2024, greyhound wagering contributed \$300,000** (\$60,000 to general fund, \$240,000 to purses, promotions, operations and breeder's development funds) to North Dakota's economy through **Advanced Deposit Wagering (ADW) tax**. Additional money is contributed by the ADWs to North Dakota's gaming charities per licensing agreements.
- Tax revenue from greyhound wagering **supports local horse racing meets, breeder's development and purses**.
- A **North Dakota State University study** found that **every \$1 generated by racing contributes \$5.20 back into the economy**.
- No evidence suggests that eliminating greyhound wagering would **improve animal welfare or economic racing conditions** in North Dakota.
- Passage of SB2384 may compel currently licensed **Advance Deposit Wagering (ADW) companies to relocate** wager processing for ALL their clients to out-of-state locations, resulting in a catastrophic loss of revenue for North Dakota's charitable organizations, general fund, North Dakota's horse racing and racing commission.

### Conclusion

- **SB2384 would hurt responsible greyhound racing and our supportive adoption programs but more importantly, it will impact North Dakota's economy and destroy your horse racing industry. Please vote Do Not Pass.**



## Greyhounds Race

Greyhounds Race & are regulated in West Virginia, Australia, Ireland, Great Britain.

There is no licensed greyhound racing in ND. All the races are regulated by their state jurisdictions and laws.



## Wagers

North Dakota ADWs, stream races and collect, payout wagers by bettors in **other states and countries**. OTBs collect and payout wagers in brick and mortar ND establishments. They use their ADW to process wagers.

# ND ADW Wagering



## North Dakota

Greyhound wagers are processed at ND licensed ADW computer centers

"Breakage" -- the 10 cent rounding -- on all ADW/OTB wagers are transferred to ND Promotions Fund



## ND Promotions



ADWs donate a portion of their proceeds to ND Horse Org & disability charities directly as part of licensing requirements



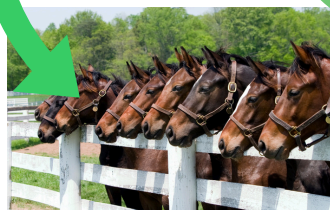
ADW Tax is paid out 1/16th to the General Fund, 1/16th to the Breeders' Fund, 1/16th to the Purse Fund and 1/16th to the the Promotional Fund



## ND Tracks



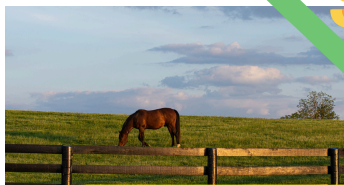
## Purses



## Breeders Dev. Fund



## General Fund



## Indirect Economic Impact

March 14, 2025

Dear North Dakota Legislators,

Thank you for your leadership and service to the state of North Dakota.

This letter is in support of SB 2384.

North Dakotans love common sense.

North Dakotans love dogs.

So it is unacceptable that our state supports an industry that harms dogs.

SB 2384 is a commonsense bill to help dogs.

Please support SB 2384.

Thank you,

Kristie Skunberg



Bill SB 2384

Horse Park Foundation  
5100 19<sup>th</sup> Ave N.  
Fargo, ND. 58102

Horse Race North Dakota  
5180 19<sup>th</sup> Ave N.  
Fargo, ND. 58102

Members of the North Dakota Legislature:

Over the past 20 years the North Dakota Horse park has helped to support Thoroughbred and Quarter horse racing and breeding in the State of North Dakota. The horse park has also made positive contributions to the local economy as well as financial contributions to charitable organizations throughout the State.

The horse park has also partnered with NDSU to share, operate and maintain the land and facilities shared by both organizations on a yearly basis.

Allowing this bill to advance would undoubtedly lead to the gradual and eventual elimination of horse racing in the State of North Dakota.

North Dakota is one of several states that has been licensing and regulating ADW's for the past few decades.

ADW's are advanced deposit wagering companies that provide the ability to wager on horse racing and dog wagering. Not allowing the ADW's to wager on dog racing in the state will lead these companies to move their licenses to other States or overseas.

Losing these ADW's will lead to millions of tax dollars leaving with them. The loss of revenue will lead to a lack of funding to support the North Dakota racing commission which regulates and supports racing and breeding in the State.



This bill is being pushed by a dog organization that has contributed absolutely nothing to the State of North Dakota.

We have recently found firm footing with our racetrack's finances, and this may force us to start over once again. The North Dakota Horse park has been in operation for over 20 years and has worked with NDSU, provided hundreds of jobs, supported the equine racing and breeding program and has had a significantly positive impact on the local economy and tourism. The licensing of our ADW partners helps contribute no less than 30-40% of the racetracks operating budget.

We ask that you please consider the deep racing history in North Dakota not only in Fargo but in Belcourt as well, before considering your final decision. We feel that this bill is not only an attack on dog racing, but on horse racing as well.

We recommend a "do not pass" of SB 2384.

Thank you for your consideration.

Hugh Alan Drexler  
General Manager  
North Dakota Horse Park



Testimony in **Opposition** to Senate Bill 2384

Dear Members of the House Judiciary Committee,

I am Deb Trickel, Vice President of Operations for US Off-Track, LLC, an advanced deposit wagering ("ADW") company licensed and regulated in North Dakota. I am writing to express our strong opposition to SB2384 which proposes the elimination of wagering on simulcast greyhound racing under the certificate system. We urge you to recommend a **DO NOT PASS on SB2384**.

I have worked in the pari-mutuel racing industry at racetracks, off-track betting sites ("OTB") and ADWs in Arizona, Oregon and North Dakota since 1988, and with greyhound adoption since 1994. I can attest that the exceptional care racing greyhounds receive during their careers is precisely why they transition so well into becoming wonderful family pets. I have never witnessed any mistreatment of greyhounds by their racing caretakers and would absolutely disengage from the industry if I had.

Greyhound racing and wagering on greyhound races are two separate activities. North Dakota has never hosted live greyhound racing, but it has legally allowed pari-mutuel wagering on simulcast greyhound races for over 30 years.

The North Dakota Racing Commission has been licensing and regulating ADW companies who offer wagering on simulcast greyhound racing for over two decades. The Commission, which is made up of five members appointed by the Governor, also licenses and regulates live horse racing and simulcast greyhound and horse wagering at off-track betting sites in North Dakota.

The North Dakota Racing Commission receives state funding to conduct its business. This appropriation is offset by taxes collected on greyhound and horse simulcast wagers, which are deposited into the general fund. Simulcast wagering taxes also fund the state's live horse racing and breeding industry through the breeders, purse and promotional fund.

100% of the breakage (the rounding down to the nearest \$0.10 of the return from winning pari-mutuel wagers by the totalizator/certificate system) goes to the Promotional Fund capping at the first \$20 million wagered per year per ADW.

Other payments & fees made to the state/racing commission include the initial license/application fees, background check fees and annual license (for ADW and individual staff).

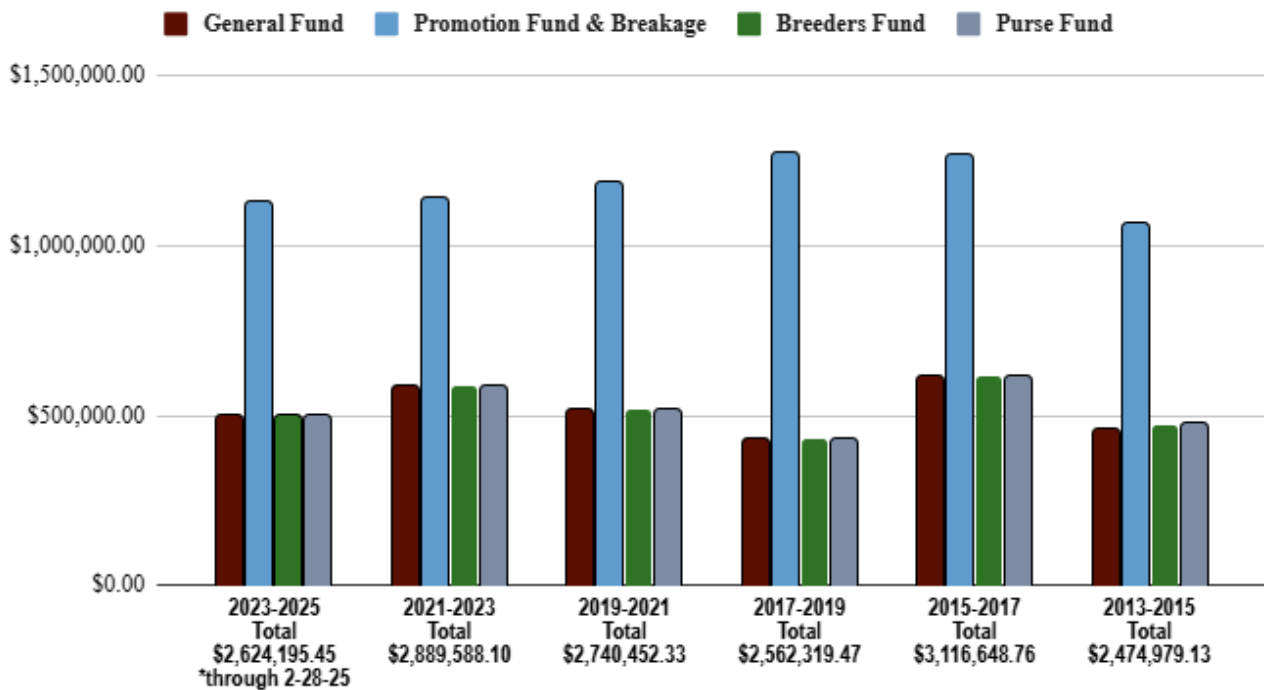
Before being licensed, all ADWs must contract with at least one nonprofit charity and agree to donate a portion of all wagers to benefit said charity or charities.

Seven of the sixteen North Dakota-licensed ADWs currently offer simulcast greyhound and horse wagering and would be negatively affected by SB2384's passage, potentially causing them to relocate to another regulatory jurisdiction. This relocation would result in significant financial losses for the State of North Dakota, charities, horsemen, and horsewomen. Ultimately, the viability of the North Dakota horse racing industry would be in jeopardy, as it relies solely on ADW tax money for funding.

US Off-Track respectfully requests that you recommend a **DO NOT PASS on Senate Bill 2384**. Thank you for your consideration.

Deb Trickel  
Vice President, Operations  
503 253 0234 ext. 70076 (o)  
503 453 5333 (c)

## Biennium ADW Tax Revenue by Fund



### ADW Taxes:

- .25% tax on all wagers (capped at \$420,000/year per ADW), which is then allocated to the following funds:
  - 1/16 to General Fund
  - 1/16 to Breeders Fund
  - 1/16 to Purse Fund
  - 1/16 to Promotional Fund

### Breakage:

- 100% of breakage to Promotional Fund (capped at first \$20 million wagered/year per ADW)

### Charitable Contributions

- Before being licensed, all ADWs must contract with at least one nonprofit charity and agree to donate a portion of all wagers to benefit said charity or charities.

### Fees and Other Payments Made to the State/Racing Commission:

- Initial license/application fees
- Background check fees
- Annual license fees (for ADW and individual staff members)

## HOUSE JUDICIARY COMMITTEE Testimony on Senate Bill 2384

March 17<sup>th</sup>, 2025

Submitted by Janelle Mitzel, Development Homes, Inc.

Chairman Klemin & Committee Members,

Thank you for your consideration of a **Do Not Pass** on SB 2384. The intent of the original bill was to allow for international gaming manufacturers to sell electronic products directly to the ND charities and removing ND distributors in the process. This bill has since been amended; however, the charitable gaming industry believes this is the first step in eliminating our long-standing distributor/charity systems that have been in place for decades. The bill also will dramatically hurt the horse racing industry by paralyzing their funding sources.

### **Development Homes, Inc:**

- DHI is a non-profit organization in Grand Forks providing community-based support services to persons with disabilities from all over ND.
- DHI has residential services including seven group homes, two duplex facilities, a multi-unit autism living center, two transitional living centers and multiple independent living settings.
- DHI provides vocational services including job training and placement, and family services including respite care and in-home support.
- DHI serves approximately two hundred individuals from children to adults, serving through all stages of life.
- DHI is currently the 12<sup>th</sup> largest employer in Grand Forks, employing 450 to 500 people. Our economic footprint is vital to our community.

If passed this bill allows manufacturers to work directly with licensed organizations, bypassing local distributors. Some think eliminating the distributors will lower the cost of electronics, however, we have found the ND charitable gaming distributors are working hard to keep prices competitive, while international companies want to dictate and control the entire pricing structure.

The charitable gaming organizations are concerned if the distributors are not directly involved the limited number of manufacturers will monopolize the market with price demands and a take-it-or-leave-it strategy. International manufacturers do not care about local charities and ND; North Dakota distributors do.

International companies interfering in the ND charitable gaming market are funding this bill. Charitable gaming distributors are local, employee local people, and reside in North Dakota.

Keep North Dakota charitable gaming local and vote **NO** on **SB 2384**.



### **Neutral Testimony for Senate Bill 2384**

Mark Jorritsma, Executive Director  
North Dakota Family Alliance Legislative Action  
March 17, 2025

Dear Chairman Klemin and honorable members of the House Judiciary Committee,

North Dakota Family Alliance Legislative Action would like to render neutral testimony on Senate Bill 2384.

Our organization is opposed to gambling due to its detrimental effect on families, but we appreciate that this bill would amend our Century Code to remove wagering on dog racing and recognize that is a step in the right direction for our state.

There is a nationwide effort to eliminate dog racing through the Greyhound Protection Act<sup>1</sup>. The cruelty suffered by greyhounds around the world is well documented.<sup>2</sup> When greyhounds are not racing around the track, they spend the vast majority of their day confined to small dirty cages. They often are denied veterinary care when they do suffer injuries or trauma. Since dogs are much more inexpensive than racehorses, they are considered easily replaced and little to no financial investment is put into their care. Racehorses are on the opposite end of the spectrum, are quite expensive and therefore receive the highest level of care from their owners who want to protect their hefty investments.

While North Dakota Family Alliance Legislative Action opposes wagering in general, we do appreciate that this bill removes simulcast dog racing from the statute. For this reason, we are testifying in a neutral position on Senate Bill 2384.

Thank you for the opportunity to provide this testimony, and feel free to contact us if you have any questions.

Mark Jorritsma  
Executive Director

---

<sup>1</sup><https://files.grey2kusa.org/pdf/GPA-Fact-Sheet.pdf>

<sup>2</sup><https://www.grey2kusa.org/about/issues.php>

**1515 Burnt Boat Dr., Suite C-148, Bismarck, ND 58503**  
**mark@Ndfamilyalliance.org**  
**701-355-6425**  
**www.ndfamilyalliance.org**



## GWG GROUP LLC

6623 Las Vegas Boulevard South  
Las Vegas, Nevada, USA 89119  
+1 619-313-7100

March 16, 2025

**Re: DO NOT PASS SB 2384**

Dear Chairman, and Members of the Judiciary Committee:

My name is John Woodford, and I write to you in my capacity as Chief Executive Officer of GWG Group LLC ("GWG"), an Advanced Deposit Wagering ("ADW") entity licensed and regulated by the North Dakota Racing Commission.

GWG has operated under a direct North Dakota license for approximately eight years. During the total time GWG has wagered via North Dakota, we have contributed more than \$4,000,000 (4m) in regulatory taxes to the state, as well as charitable contributions in the amount of \$70,000, each year. In addition to wagering on horse racing, GWG customers wager on domestic and international Greyhound racing. This, in turn, generates taxable revenue to the State of North Dakota.

Should this bill be passed, I will be compelled to seek a license outside of North Dakota to ensure the successful continuation of our greyhound wagering business. Ultimately, this would result in GWG - the largest ADW by wagering volume and tax contributions in the state - migrating all activity and the resulting taxable revenues to a different jurisdiction.

Throughout this process, I have been somewhat mystified as to why the state of North Dakota is being targeted in these bills, given there is no greyhound racing run or operated in the state. It is made even more perplexing given GWG customers, who enjoy both domestic and international greyhound racing, will continue to wager on the product regardless of the outcome.

If the bill is passed, it seems to be the case the only loser will be the state, with fiscal contributions made by my company being redirected to a different regulatory framework.

I have had a career in racing and wagering for close to three decades. I also own greyhounds overseas and as an owner, have won several of the classics held in Ireland. Despite what out-of-state special interest groups are attempting to purport, as an industry veteran, wagering specialist, and owner of multiple greyhounds, I have no concerns regarding the industry's animal welfare practices. I can assure you I would not participate from a wagering operations or ownership standpoint, if I had any concerns that greyhound welfare was not paramount for these well-established racing operators.

You may contact me directly should you require any additional information or opinion.

Regards,



John Woodford  
Chief Executive Officer  
GWG Group LLC



March 16, 2025

House Judiciary Committee

State Capital

Bismarck, ND 58505

SB 2384 – Recommendation of Do Not Pass

Dear Representative Klemin and Committee Members

Good morning, my name is Joe Hoffert, an owner/partner of Western Distributing Company. Western Distributing Company has been a licensed Distributor working with Charities in North Dakota since 1992. We presently have 21 Full Time employees working around the State of North Dakota, with employees located in Bismarck, Minot, Fargo, Valley City and Minto.

The proposed language stating a Manufacturer may work directly with a licensed organization etc. will be confusing to the North Dakota Charitable Gaming industry. The licensed organization presently works with licensed distributors and this process has worked well for charities, manufacturers and distributors. Everyone presently knows the process to keep the electronic pull tab machines serviced and maintained. Our company is made up of several well-trained and experienced service technicians. We provide preventive monthly cleaning and provide service as needed when a machine with an issue arises. We average around 3700 service calls per year and have a great track record with our charitable accounts.

We, along with the other distributors in the State of North Dakota have made a significant investment in our companies to provide the best services and products to the licensed organizations. We have sales and service people throughout the state along with vehicles and equipment to provide prompt service. If this bill were allowed to pass their livelihoods would be threatened and our investments significantly impacted.

In conclusion, please vote “DO NOT PASS” on SB 2384 to protect North Dakota businesses, jobs and charitable organizations.

Thank You for your time and consideration.


Sincerely,

Joe Hoffert

Western Distributing Company

 [admin@westerndistributingco.com](mailto:admin@westerndistributingco.com)  
[www.westerndistributingco.com](http://www.westerndistributingco.com)

 **Office**  
701-223-0154  
**Service Dept.**  
877-743-8227

 120 W Sweet Ave.  
Bismarck, ND 58504  
PO Box 832 58502

March 17, 2025

House Judiciary Committee  
North Dakota House of Representatives

**Re: OPPOSE SB 2384**

Chairman Klemin, Vice-Chairwoman Karls and Members of the Committee,

My name is Robert Harms, I am speaking for myself and ask you to OPPOSE SB 2384. I'm a partner in Western Distributing a North Dakota gaming distributor located in Bismarck. We have 20 employees, 9 of whom are service techs who serve dozens of charities we do business with.

As introduced **SB 2384** was to allow gaming manufacturers to sell directly to charities—that was the goal. Here is the bill's history:

- Initially it was introduced as HB 1342; but was withdrawn by the sponsor.
- Strongly Opposed in Senate; 2 in favor; 21 OPPOSED
- Amended; allow manufacturers to “work directly with” charities for maintenance (new); a “foot in the door” for manufacturers--direct sales will follow in 2027.
- Passed the Senate by 1 vote (24 to 23).

**THE BILL IS BAD FOR OUR STATE.** Here's why:

**DOGS:**

- **Prohibits betting on dog-racing;** costs general fund \$60,000 and \$240,000 other funds in 27-29 biennium; Bad practice. The purse, breeders, and promotion funds are vital to North Dakota horse racing. The bill will hurt ND's horse park in Fargo.
- **Hurts ND horse-racing** because dog-racing betting supports ND horse-racing through “other funds” shown above. (Bettors from around the world play in ND).

**GAMING:**

- **Not ONE ND distributor or charity has testified IN FAVOR of SB 2384**
- **Not ONE manufacturer has testified IN FAVOR of SB 2384; all who have expressed a view are OPPOSED to the bill.**
- Charitable Gaming Association of ND (CGAND) is **OPPOSED** SB 2384.
- ND Gaming Alliance **OPPOSED** SB 2384
- **SB 2384 threatens ND businesses.** There are 16 gaming distributors in ND. They are ND companies who have been here for decades. They employ ND people,

support ND communities and pay ND taxes. Their revenues stay IN ND. SB 2384 policies will hurt, if not eventually destroy them.

- **SB 2384 begins to diminish competition.** Allowing manufacturers to “work directly with charities” will lead to direct sales; will erode ND’s distributor network and will stifle competition from new, smaller manufacturers. Eventually a few large multi-national manufacturers will dominate charitable gaming in ND.
- **The current model serves ND well.** Distributors, whether located in Fargo, Devils Lake, Williston or Bismarck are in touch with charities daily, to meet their needs and provide prompt service. This relationship has produced millions of dollars statewide to communities for the arts, sports organizations, economic development, and fraternal and veterans’ organizations. (In 2022: \$74 million went to charities and \$20 million to ND in gaming taxes). *CGAN Economic Impact Study*
- Finally, SB 2384 was brought purportedly as a result of complaints from unnamed charities, who have yet to testify or appear in support of the bill. We should never make public policy in North Dakota based upon innuendo, unsubstantiated complaints and hearsay. If you don’t show up, you shouldn’t influence the result.

There is NO legitimate policy reason to disrupt the current model that serves well, our State’s charitable gaming community. Please vote DO NOT PASS on SB 2384.

Robert W. Harms,  
Williston, North Dakota

Legislatures,

I am the president of the North Dakota Thoroughbred Association (Scott A Horst). The NDTA is registered with the state of ND since 1965, with a long history in supporting the Horse racing industry and Horse men and women of the state. We want to state the importance of the effects of the listed legislature bill being brought forward that will be affecting and will kill the long history of horse racing in our great state of North Dakota.

SB-2384

This bill is designed to eliminate the wagering on dog racing through ND licensed Advanced Deposit Wagering companies (ADW). As we all know there is no Dog racing in ND but there are different jurisdictions in different countries that it is legal and seen as their type of Kentucky Derby. If this bill passes the state of ND will lose millions of dollars contributing to ND general fund tax pool, pursue funds for racing, promotion funds used to conduct races in Fargo and Belcourt, bred fund which supports the ND breeding program for Thoroughbreds and Quarter Horses. DO NOT PASS

Thank you,

NDTA President

Scott A Horst

701-527-0674

horsrcn@hotmail.com

**House Judiciary Committee  
Testimony in Opposition to SB 2384  
Bill Kalanek, Charitable Gaming Association of ND  
March 16th, 2025**

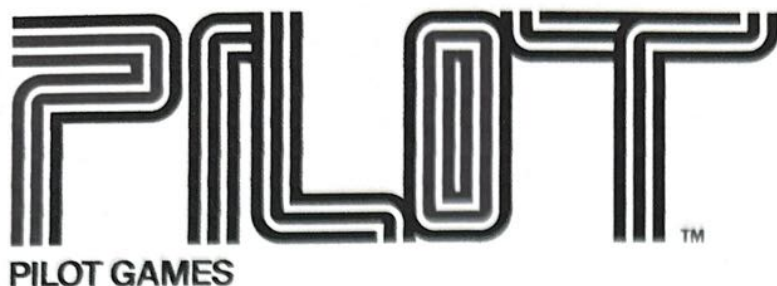
Chairman Klemin and members of the House Judiciary Committee, my name is Bill Kalanek and I'm before you today on behalf of CGAND, the Charitable Gaming Association of ND.

CGAND stands opposed to SB 2384, which would allow international manufacturers to work directly with North Dakota charities. North Dakota charitable gaming distributors have played an important role in the ND gaming market. Many years ago North Dakota legislators wisely created a three-tiered system, setting statutory parameters for North Dakota companies to be the go-between entities of charities and international manufacturers. Locally licensed ND distributors are responsible for selling and distributing gaming equipment used to conduct charitable gaming.

Currently North Dakota has 16 licensed gaming distributors scattered across the state selling gaming products and providing technical services to ND charities. Charities have been satisfied with the current structure, allowing for competitive prices and a wide range of products available. Distributors are locally owned, employ local people, and are considered experts in North Dakota market.

CGAND encourages the committee to give a DO NOT PASS recommendation to **SB 2384**.





**February 4th, 2025**

Senate Judiciary Committee  
State Capitol  
Bismarck, ND 58505

SB 2384 – Do Not Pass

Dear Chairwoman Larson and Members of the Committee,

My name is Abhinay Bhagavatula, and I serve as the Chief Product Officer at Pilot Games. We are a manufacturer of gaming equipment, based in Minnetonka, MN; Detroit, MI; Atlanta, GA; and Reno, NV, and have been operating in North Dakota since 2019.

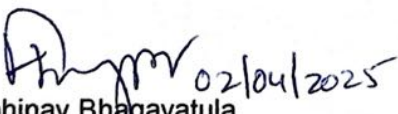
We urge you to oppose SB 2384 and vote for a DO NOT PASS resolution.

The existing gaming model in North Dakota has proven successful for decades, supporting local businesses and contributing to community development through significant investments by distributors. We are concerned that SB 2384 could harm or potentially eliminate many of these North Dakota distributors, reduce competition, and lead to industry consolidation, which would adversely affect the market.

We respectfully request that you vote DO NOT PASS on SB 2384.

Thank you for considering our position on this matter.

Sincerely,

  
Abhinay Bhagavatula  
Chief Product Officer, Pilot Games  
630-267-6840

**Pilot Games, Inc.**  
4737 County Road 101 #309  
Minnetonka, MN 55345

 [www.pilotgames.com](http://www.pilotgames.com)  
 [info@pilotgames.com](mailto:info@pilotgames.com)

March 16, 2025

House Judiciary Committee  
State Capitol  
Bismarck, ND 58505



Subject: Opposition to SB 2384 - Please vote NO (Do Not Pass)

Dear Chairman Klemin and members of the Committee,

I urge you to vote NO on SB 2384. The bill initially aimed to eliminate distributors from the charitable gaming supply chain in North Dakota. Opposition from charities, distributors, and manufacturers led to the amended language allowing manufacturers to service their equipment without the distributor.

To be frank, this is an annoying and ambitious attempt to manipulate the charitable gaming marketplace in North Dakota to benefit an outside interest.

Allowing manufacturers to provide direct service is unnecessary and directly undermines our role as a distributor. Our value proposition is to provide a single point of contact (local person) for service of all gaming equipment, regardless of manufacturer. Without our support, charities must navigate multiple service providers, adding unnecessary complexity and frustration to their operations. This bill not only diminishes the role of distributors but also disrupts the long-standing and successful model that charitable organizations rely on for their gaming needs.

We also have serious concerns that if this bill is passed, it may lead to unforeseen consequences. A bad actor could use this bill as a loophole to redirect sales channels and influence charities.

In conclusion, please vote DO NOT PASS on SB 2384. Doing so will protect North Dakota jobs, maintain efficient and cost-effective distribution for charities, and uphold the integrity of our local charitable gaming industry.

Thank you for your consideration.

Respectfully,

Brook Lyter  
FPN Gaming/President  
Licensed Distributor

House Judiciary Committee

North Dakota State Legislature

Submitted March 16<sup>th</sup>, 2025

By Gerald Parker, Manager Western Distributing Company

Do Not Pass Do Not Amend SB 2384

Dear Chairman Klemin and fellow committee members,

When this language was first introduced as HB 1342, the North Dakota House of Representatives acted quickly and appropriately by eliminating this legislation. The language has since been resurrected, then amended, as SB 2384. This legislation continues as an ongoing attempt to favor massive out of state interests over more than a dozen local distributor businesses. Please do not allow that to happen.

Thank You!

Gerald Parker

Western Distributing Company

March 17, 2025

Dear Chairman Klemin and members of the committee,

My name is Craig Valnes. I am the lead customer service/tech support agent for the Bismarck arm of FPN Gaming. Our company has been licensed as a distributor in ND for 16 years and we currently employ 16 full time individuals with warehouses in Bismarck, Fargo and Devils Lake. I am writing this testimony today to urge you to vote NO on SB 2384!

This bill in its original form, as proposed by Senator Cory, sought to undermine the hard work of the distributors of ND by allowing the manufacturers to sell directly to charities. Please keep in mind that these manufacturers were only asking to sell etabs! They didn't care about the other products necessary for the charities of ND to present a good product to their customers such as paper products, bingo supplies, blackjack tables, etc. They sought only the ability to sell what could easily increase their profit margins and line their out of state pockets!

When it became apparent to them that the bill was not going to go through in its original form, they have now asked for the ability to contact charities directly for the purpose of maintaining and repairing the etab machines. This completely undermines the business model of the distributor and is simply a baby steps approach to getting what they want! It directly attacks the one thing that we pride ourselves on and that is the service of our customers! Service has always been our number one priority and in a very competitive market place, it's the one thing that can distinguish one distributor from another.

Senator Cory claims that this bill was written because several charities were having problems getting their machines serviced from their distributor. I would like to point out 2 things in regards to her statement:

- 1) There is already a system in place for these charities to get their machines serviced. Most charities contact their distributor directly but they may directly contact the manufacturer's customer service line for help as well. Almost all issues can be solved remotely. When service is needed the manufacturer reaches out to the distributor and the distributor dispatches someone to fix the machine. If the distributor is not doing its job and the charity is unhappy in any way, that charity can change which distributor it is using at any time!
- 2) If that statement is true, then why has NOT ONE single charity stood up in favor of this bill. In fact, there is testimony from several charities including the likes of Janelle Mitzel from Development Homes, Inc in Grand Forks, Don Santer the CEO of NDAD in Grand Forks and more as well as several manufacturers themselves that have all said they do not want SB 2384 to pass!

In closing, it is through the hard work and dedication of the distributors of ND that have helped the charities of ND increase their revenues through etab gaming. Without the trust of these charities, we would not be able to do the work that we enjoy so much! Please do not allow

these BIG out of state corporate entities to change the way we do business and threaten the jobs of hard working North Dakotans! Vote No on SB 2384!

Sincerely,

Craig Valnes  
Lead Tech Support/Customer Service  
FPN Gaming

## Northland Gaming

7101 Chrisan Blvd  
Fargo ND 58104

House Judiciary Committee  
ND State Legislature  
Bismarck ND 58505

SB2384 for consideration of a Do Not Pass vote.

Dear Mr. Chairman and fellow committee members.

My name is William Garrett and I am the Owner operator of Northland Gaming a licensed Distributor in the state of North Dakota located in Fargo ND, I have been licensed in the state of North Dakota for the last 23 years and have been in the industry for 32 years and counting.

I am here today to testify against the proposed language under section 1 part 7, where as, language submitted is to allow manufacturers to work directly with charities on maintenance and software issues with their equipment, the language has been changed from the initial Senate version, which allowed for sales and service by manufacturers to charities, to just service. But this bill is still about access by manufactures, directly to charities and the possibility to influence a charity on using only their product. The current 4 tier system, manufacture to distributor, distributor to charity, charity to the bar, is currently in place to prevent such influence by one party over another, and has worked well for decades, and I feel doesn't need to be changed.

Please consider a DO NOT PASS on Bill SB2384

Sincerely  
William Garrett  
Northland Gaming



TESTIMONY IN SUPPORT OF SENATE BILL 2384  
SENATE JUDICIARY COMMITTEE  
March 17, 2025

Good Morning Chair Klemin and House Judiciary Committee. My name is Claire Cory. I am a North Dakota State Senator representing District 42, which includes northwest Grand Forks. I stand as the prime sponsor of Senate Bill 2384.

This bill, once the committee adopts amendments, does two things. It cleans up some language related to physical stamps on electronic machines, which are no longer needed because the machines have serial numbers. Second, it eliminates wagering on dogs through the ADW system.

Section 1, subsection 2 of version 25.1323.01000

- This is simply cleaning up language. It adds the word paper. There are issues of buying stamps and trying to put stamps on electronic games, which is unnecessary because they have serial numbers, so it strikes the need for stamps for those games.

Section 1, subsection 7, strike out section

Section 2,3,4

- is removing wagering on greyhounds

Section 5 (version

- Phase out of elimination of greyhound racing to allow racing commission to adapt to new changes

During the interim Judiciary Committee of the 68th legislative assembly we had discussions on eliminating greyhound racing. I thought it was important to introduce the bill after hearing concerns about Greyhound racing. it is illegal in every state, except West Virginia where they are trying to remove it from their constitution, and as of 2026 it will be illegal in 195 countries. Millions of dollars are funneled through North Dakota and very little revenue goes back into our state. Finally, The sport is not well regulated, unlike horse racing, and has been tied to (bad actors) cartel groups and illicit drugs.

Mr. Chair and committee members, I urge a do pass. I will stand for any questions.

Sixty-ninth  
Legislative Assembly  
of North Dakota

**FIRST ENGROSSMENT**

**ENGROSSED SENATE BILL NO. 2384**

Introduced by

Senators Cory, Patten

Representatives Hagert, Meier

1 A BILL for an Act to amend and reenact section 53-06.1-14, subsection 11 of section  
2 53-06.2-01, and sections 53-06.2-07 and 53-06.2-10 of the North Dakota Century Code, relating  
3 to the maintenance of electronic pull tab devices and the elimination of dog racing; and to  
4 provide an effective date.

5 **BE IT ENACTED BY THE LEGISLATIVE ASSEMBLY OF NORTH DAKOTA:**

6 **SECTION 1. AMENDMENT.** Section 53-06.1-14 of the North Dakota Century Code is  
7 amended and reenacted as follows:

8 **53-06.1-14. Distributors and manufacturers.**

9 1. A manufacturer of pull tabs, bingo cards, electronic quick shot bingo systems and  
10 devices, or bingo card marking devices shall apply annually for a license and pay a  
11 license fee of five thousand five hundred dollars. A manufacturer of electronic pull tab  
12 systems and devices shall apply annually for a license and pay a license fee of ten  
13 thousand dollars. The attorney general shall deposit one thousand five hundred dollars  
14 of these fees into the charitable gaming technology fund under section 53-06.1-12.4. A  
15 manufacturer of paper pull tab dispensing devices shall apply annually for a license  
16 and pay a license fee of one thousand five hundred dollars. The attorney general shall  
17 deposit five hundred dollars of this fee into the charitable gaming technology fund  
18 under section 53-06.1-12.4. A manufacturer of electronic raffle systems shall apply  
19 annually for a license and pay a license fee of one thousand dollars. The attorney  
20 general shall deposit five hundred dollars of this fee into the charitable gaming  
21 technology fund under section 53-06.1-12.4. A distributor shall apply annually for a  
22 license and pay a license fee of two thousand dollars. The attorney general shall

- 1 deposit five hundred dollars of this fee into the charitable gaming technology fund  
2 under section 53-06.1-12.4. Application must be made before the first day of April in  
3 each year on a form prescribed by the attorney general.
- 4 2. A licensed distributor may not sell, market, or distribute gaming equipment except to a  
5 licensed distributor, licensed organization, organization that has a permit, or other  
6 person authorized by gaming rule or the attorney general. A manufacturer of a pull tab  
7 dispensing device, pull tab, electronic pull tab device, bingo card marking device,  
8 bingo card, or fifty-fifty raffle system may only sell, market, or distribute the  
9 manufacturer's pull tab dispensing device and processing chip encoded with  
10 proprietary software, pull tab, electronic pull tab device, bingo card marking device,  
11 bingo card, or fifty-fifty raffle system to a licensed distributor. A licensed distributor may  
12 purchase or acquire a pull tab dispensing device and processing chip encoded with  
13 proprietary software, pull tab, electronic pull tab device, bingo card marking device,  
14 bingo card, or fifty-fifty raffle system only from a licensed manufacturer or licensed  
15 distributor. However, a distributor may purchase or acquire a used pull tab dispensing  
16 device or electronic pull tab device from a licensed organization. A distributor may not  
17 duplicate a manufacturer's processing chip encoded with proprietary software. No  
18 gaming equipment or prize may be sold or leased at an excessive price.
- 19 3. A licensed distributor shall affix a North Dakota gaming stamp to each deal of pull <sup>paper</sup>  
20 tabs, raffle board, punchboard, sports pool board, calcutta board, and series of  
21 paddlewheel ticket cards sold or otherwise provided to a licensed organization or  
22 organization that has a permit and shall purchase the stamps from the attorney  
23 general for thirty-five cents each. Ten cents of each stamp sold by the attorney  
24 general, up to thirty-six thousand dollars per biennium, must be credited to the  
25 attorney general's operating fund to defray the costs of issuing and administering the  
26 gaming stamps. If an organization hosts an event with a raffle board and only sells  
27 numbered squares on the day of event, the organization is exempt from the  
28 requirements under this subsection.
- 29 4. A licensed organization, organization that has a permit, licensed manufacturer, or  
30 North Dakota wholesaler of liquor or alcoholic beverages may not be a distributor or  
31 stockholder of a distributor. A distributor may not be a stockholder of a manufacturer.



- 1       5. In addition to the license fee, the attorney general may require advance payment of
- 2           any fee necessary to pay the cost of a record check of an applicant according to
- 3           subdivision c of subsection 5 of section 53-06.1-06.
- 4       6. A licensed manufacturer may not refuse to sell deals of pull tabs, paper bingo cards, or
- 5           gaming equipment to a licensed distributor unless:
- 6           a. A specific deal of pull tabs is sold on an exclusive basis;
- 7           b. The manufacturer does not sell deals of pull tabs, paper bingo cards, or gaming
- 8           equipment to any distributor in the state;
- 9           c. A gaming law or rule prohibits the sale;
- 10          d. The distributor has not provided the manufacturer with proof of satisfactory credit
- 11          or is delinquent on any payment owed to the manufacturer; or
- 12          e. The distributor has not met the manufacturer's standard minimum order quantity
- 13          and freight terms.
- 14       7. ~~A manufacturer may work directly with a licensed organization to ensure proper~~
- 15          ~~maintenance of and address technical or software issues with an electronic pull tab~~
- 16          ~~device. A distributor or manufacturer of an electronic pull tab device shall notify a~~
- 17          ~~licensed organization of scheduled maintenance or repair and allow an organization to~~
- 18          ~~have a representative present when any maintenance or repair is performed.~~

19       **SECTION 2. AMENDMENT.** Subsection 11 of section 53-06.2-01 of the North Dakota  
20 Century Code is amended and reenacted as follows:

- 21       11. "Racing" means live or simulcast horse racing under the certificate system or
- 22          ~~simuleast dog racing under the certificate system.~~

23       **SECTION 3. AMENDMENT.** Section 53-06.2-07 of the North Dakota Century Code is  
24 amended and reenacted as follows:

25       **53-06.2-07. Issuance of licenses - Applications.**

- 26       1. On compliance by an applicant with this chapter and the approval of the attorney
- 27          general, the commission may issue a license to conduct races. The attorney general
- 28          may not grant a license denied by the commission.
- 29       2. An application for a license to conduct a racing meet must be signed under oath and
- 30          filed with the commission. The application must contain at least the following:
- 31          a. The name and post-office address of the applicant.

- 1           b. The location of the racetrack and whether it is owned or leased. If the racetrack is
- 2           leased, a copy of the lease must be included.
- 3           c. A statement of the applicant's previous history and association sufficient to
- 4           establish that the applicant is an eligible organization.
- 5           d. The time, place, and number of days the racing meet is proposed to be
- 6           conducted.
- 7           e. ~~The type of racing to be conducted.~~
- 8           f. Other information the commission requires.
- 9        3. At least thirty days before the commission issues or renews a license to conduct
- 10       races, the applicant shall deliver a complete copy of the application to the local
- 11       jurisdiction governing body. The application to the commission must include a
- 12       certificate verified by a representative of the applicant, indicating delivery of the
- 13       application copy to the governing body. If the governing body of the local jurisdiction
- 14       adopts a resolution disapproving the application for license or renewal and so informs
- 15       the executive director within thirty days of receiving a copy of the application, the
- 16       license to conduct races may not be issued or renewed.
- 17       4. A totalizator or service provider licensee may not use its license to offer bets or wagers
- 18       on dog races.

19       **SECTION 4. AMENDMENT.** Section 53-06.2-10 of the North Dakota Century Code is  
20       amended and reenacted as follows:

21       **53-06.2-10. Certificate system - Rules.**

22       The certificate system allows a licensee to receive money from any person ~~present at~~ on a  
23       live horse race, or simulcast horse race, or simulcast dog race who desires to bet on any entry in  
24       that race. A person betting on an entry to win acquires an interest in the total money bet on all  
25       entries in the race, in proportion to the amount of money bet by that person, under rules  
26       adopted by the commission. The licensee shall receive the bets and for each bet on a live or  
27       simulcast horse race shall issue a certificate to the bettor on which is at least shown the number  
28       of the race, the amount bet, and the number or name of the entry selected by the bettor. The  
29       commission may adopt rules for place, show, quinella, combination, or other types of betting-  
30       usually connected with racingwagering on live or simulcast horse races.

- 1       **SECTION 5. EFFECTIVE DATE.** Sections 2, 3, and 4 of this Act become effective on
- 2   August 1, 2027.



Testimony in Opposition to SB 2384

69th Legislative Assembly

House Judiciary Committee

March 10, 2025,

Testimony of Bruce A. Johnson, Executive Director, NDRC

Chairman Klemin, members of the House Judiciary Committee, my name is Bruce Johnson, and I am the Executive Director for the North Dakota Racing Commission. This Commission is the state agency responsible for live and simulcast horse and dog racing in North Dakota. I rise today on behalf of the Commission to provide testimony in opposition to Senate Bill 2384. Senate Bill 2384 aims to amend and reenact section 53-06.1-14, subsection 11 of section 53-06.2-01, and sections 53-06.2-07 and 53-06.2-10 of the North Dakota Century Code, relating to the maintenance of electronic pull tab devices and the elimination of dog racing; and to provide an effective date.

The racing commission is not interested in the parts of this bill dealing with e-gaming machines. We are extremely interested, (*concerned*), with the three (3) lines in this bill which seek to eliminate the wagering on Greyhound racing in the state. Since there is no greyhound racing in North Dakota, and only a very small amount of wagering being processed on dog racing thru our licensed OTB's in the state, this bill is directly aimed at our licensed and regulated Account Deposit Wagering companies.

If allowed to pass, SB 2384 will shut off approximately 10% of the race wagering processed thru our 16 ADW partners. This would then trickle down to affect the same 10% in the amount we tax our licensed ADW's. The amount wagered on Greyhound racing in our state is small when compared to how much is wagered on horse racing. What is significant, (one could go even further, and state is an existential threat to our horse racing industry), is the reaction we would face on the part of these ADW operators. Representatives of our five (5) largest revenue producing ADWs have stated to me privately, as well as in public testimony on the senate side, that if SB2384 passes they will immediately begin the process of moving their entire operations to a state that does allow for wagering on Greyhound races. If this happens, they will not need to look far as a license similar to the one we offer in Nd. exists in nearby states. The affect on our live racing program in the state of North Dakota would be devastating.

Currently the racing commission maintains three (3) special funds designed to assist in our small but passionate live racing program in the state. These funds are currently holding just enough for the racing commission to allocate to our site operators to run live races financially attractive enough to keep both horses, and horsemen, coming back every year. At this time, any reduction in tax funds will put us in a position where we would need to cancel live racing as soon as 2026.

Looking elsewhere for funding would only lead back to a need to expand gaming in the state. The racing commission is proud of how it has been able to maintain live racing without needing to expand on gambling in North Dakota or relying upon its own race wagering.

The North Dakota Racing Commission and the horsemen & women in the state it represents is at a serious crossroads. This crossroad was not built by us, yet we are left to navigate through it. This sudden existential issue caused by SB2384 is the result of an attempt by a well-funded, east coast, animal rights group imposing its politically correct, and did I say, well-funded, will on a small state, and an even smaller state agency.

We urge the Nd. House of Representatives to stop this bill now. It barely slipped by the Senate with overwhelming opposition. Let's not make the same mistake here.

Sincerely,

*Bruce A. Johnson*

Bruce A. Johnson

Executive Director

North Dakota Racing Commission

Figures from calendar year 2024

ONLY ND Simulcast Facilities				
2024	Total Wager	Greyhound Race	Horse Race	% of Greyhound Race
Skydancer	91,509.00	11,779.00	79,730.00	12.87%
Williston OTB	3,259.00	0.00	3,259.00	0.00%
Rumors	210,046.00	7,092.00	202,954.00	3.38%
Sidestreet	218,009.00	4,306.35	213,702.65	1.98%
	522,823.00	23,177.35	499,645.65	4.43%

Of the overall wagering handle processed thru our four Nd. "Simulcast" facilities, 4.43% was on Greyhound Racing.

23,177.35 of 522,823.00 was wagered on Greyhound Racing in 2024.

ADW + Simulcast					
ADW Companies (Licensed Service Providers)	Total Wagers	Greyhound Race	Horse Race	% of Greyhound Race To Each Provider	% of Greyhound Race To Total Wager Handle
1 CW's Tech	704.00	40.00	664.00	5.68%	0.0000%
2 Elite Turf Club	19,325,081.00		19,325,081.00	0.00%	0.0000%
3 Global	175,383,045.00	2,891,243.00	172,491,802.00	1.65%	0.7220%
4 HOJO OTB	116,585.20	1,834.00	114,751.20	1.57%	0.0005%
5 HRND	307,474.70		307,474.70	0.00%	0.0000%
6 Lien Games	24,409,454.00	6,021,772.00	18,387,682.00	24.67%	1.5037%
7 Hartlane	16,176,213.00		16,176,213.00	0.00%	0.0000%
8 Paribet	143,874,998.00	15,189,700.00	128,685,298.00	10.56%	3.7930%
9 Play-Up	2,073,350.00	26,793.00	2,046,557.00	1.29%	0.0067%
10 Rumors	210,046.00	7,092.00	202,954.00	3.38%	0.0018%
11 US Offtrack	3,969,691.00	2,978,068.00	991,623.00	75.02%	0.7436%
12 Watch & Wager	14,098,162.00	7,126,559.00	6,971,603.00	50.55%	1.7796%
13 Xpressbet			0.00		
ND Simulcast Outlets	522,823.00	23,177.35	499,645.65	4.43%	0.0058%
14 Skydancer	91,509.00	11,779.00	79,730.00		
15 Williston	3,259.00	0.00	3,259.00		
16 Rumors	210,046.00	7,092.00	202,954.00		
17 Sidestreet	218,009.00	4,306.35	213,702.65		
All Service Providers	400,467,626.90	34,266,278.35	366,201,348.55	8.56%	
	361,735,350.00	38,732,276.90		9.97%	

Of the overall wagering handle processed thru all 16 of our Nd. licensed "ADW" facilities, (which includes our 4 simulcast outlets), 0.0058% was on Greyhound Racing. INSIDE NORTH DAKOTA

Just 23,177.35 of 400,467,626.90 was wagered on Greyhound Racing. INSIDE NORTH DAKOTA

Of all our taxable wager dollars processed in 2024 thru our licensed ADW operators, 8.56% was on Greyhound Racing.

Of a Total, 400,467,626.90 wagered Thru ADW & Simulcast on Racing in 2024, 34,266,278.35 was wagered on Greyhound Racing.

361,735,350.00 of 400,467,626.90 would be approximately how much taxable revenue we would stand to lose when our highest performing ADW companies head for other states which do offer Greyhound Race.

38,732,276.90 in taxable revenue would be a 95% Decrease in tax dollars.



**North Dakota Racing Commission**  
**General Fund Payments into General Fund**

	General Fund	2023-2025 Biennium	2021-2023 Biennium	2019-2021 Biennium	2017-2019 Biennium	2015-2017 Biennium	2013-2015 Biennium	Total	Comments
	Original Appropriation	\$475,006.00	\$407,894.00	\$399,072.00	\$379,621.00	\$387,821.00	\$389,244.00	\$2,438,658.00	Through February 28, 2025 for the current biennium
	Taxes from ADW's to General Fund	\$498,946.66	\$583,591.72	\$518,301.71	\$429,266.69	\$615,433.34	\$457,561.03	\$3,103,101.15	
		\$23,940.66	\$175,697.72	\$119,229.71	\$49,645.69	\$227,612.34	\$68,317.03	\$664,443.15	This is additional \$ into the General Fund after the appropriation \$ were paid back
								</	

# 2025 HOUSE STANDING COMMITTEE MINUTES

**Judiciary Committee**  
Room JW327B, State Capitol

SB 2384  
3/24/2025

Relating to the maintenance of electronic pull tab devices and the elimination of dog racing; and to provide an effective date.

2:45 p.m. Chairman Klemin opened the hearing.

Members Present: Chairman Klemin, Vice-Chairman Karls, Vice-Chairman Vetter, Representatives Christianson, Henderson, Johnston, McLeod, S. Olson, Satrom, Tveit, VanWinkle, Wolff, Schneider

Members Absent: Representative Hoverson

## **Discussion Topics:**

- Global dog racing locations
- Live horse racing in North Dakota
- Account deposit wagering

2:51 p.m. Representative Tveit moved a Do Not Pass and rerefer to Appropriations.

2:51 p.m. Representative S. Olson seconded the motion.

<b>Representatives</b>	<b>Vote</b>
Representative Lawrence R. Klemin	Y
Representative Karen Karls	N
Representative Steve Vetter	N
Representative Nels Christianson	Y
Representative Donna Henderson	Y
Representative Jeff Hoverson	A
Representative Daniel Johnston	Y
Representative Carrie McLeod	N
Representative SuAnn Olson	Y
Representative Bernie Satrom	N
Representative Mary Schneider	Y
Representative Bill Tveit	Y
Representative Lori VanWinkle	N
Representative Christina Wolff	Y

3:07 p.m. Motion passed 8-5-1

3:07 p.m. Representative Tveit will carry the bill.

After the hearing it was determined that the bill would not be rereferred to Appropriations.

Judiciary Committee  
SB 2384  
March 24, 2025  
Page 2

3:07 p.m. Chairman Klemin closed the hearing.

*Wyatt Armstrong, Committee Clerk*



**REPORT OF STANDING COMMITTEE  
ENGROSSED SB 2384 ([25.1323.03000](#))**

**Judiciary Committee (Rep. Klemin, Chairman)** recommends **DO NOT PASS** (8 YEAS, 5 NAYS, 1 ABSENT OR EXCUSED AND NOT VOTING). SB 2384 was placed on the Fourteenth order on the calendar.