



100 Maryland Avenue NE, Room 310, Washington, DC 20002 (202) 567-6996

Testimony of Les Bernal, National Director, Stop Predatory Gambling
Before the Subcommittee on Commerce, Manufacturing, and Trade
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Thank you Mr. Chairman and members of the Subcommittee on Commerce, Manufacturing, and Trade for the opportunity to testify about whether government should sponsor internet casinos.

My name is Les Bernal and I am the National Director of Stop Predatory Gambling, a 501c3 organization. We are a national transpartisan coalition of more than 500,000 citizens and groups from diverse backgrounds, religious faiths, political convictions, and life circumstances. We are the most diverse movement in the nation, an affirmation that most Americans share basic core principles and values regardless of their position along the political spectrum.

We have dedicated ourselves to a fundamental national reform – to stop government from sponsoring and promoting gambling.

In 1999, as government's partnership with gambling began to metastasize, the federally-funded National Gambling Impact Study Commission concluded its intensive investigation of gambling in America with a call for a moratorium on further expansion. That recommendation was willfully ignored as many states began promoting more and more extreme forms of gambling in many more locations: \$50 lottery scratch off tickets; Keno games 1500 times a week at the corner convenience store; regional casinos just a short drive away where citizens can lose their money playing slot machines several times a week instead of 1-2 times a year; and now the latest lobbying push is for internet casinos so every bedroom can be turned into an Atlantic City casino and every smart phone can be a portable slot machine, 24 hours a day. And, nearly all of it is targeted at middle-to-low income citizens.

Whether or not you personally participate in government's gambling program, it is a public policy that is having a major impact on our nation as a whole. It is affecting our health, our economics, our politics, our ideas and social values. It appears to be connected in important ways

to the rise of American inequality. And because these changes are new and still developing, they tend to be only partially and often poorly understood by opinion leaders and the general public alike, especially those who have little if any interaction with government sponsored gambling themselves.

I respectfully ask the Committee members to consider these two questions as you examine the issue of government-sponsored gambling on the internet:

- 1) The very fact that state governments have now begun promoting internet gambling to their own citizens invites the question has government sponsorship of casinos and lotteries failed?
- 2) And why would any reasonable person believe the result will be any different if internet gambling is allowed to be sponsored and promoted by the government?

Has government sponsorship of casinos and lotteries failed?

The evidence shows overwhelmingly the answer is yes. While most people understand lotteries are an extension of government, many citizens don't fully realize that the same is true for casinos. Casinos are the creation of state government and its public policies. They are instituted by the states to create a new revenue source separate from direct taxation and in the process, they create regional monopolies for the casinos. They regulate with a finger on the scale, looking to maximize revenues and often in ways that discriminate against other legal businesses. They rescue casinos from bankruptcy. Without the legal, administrative, regulatory, and promotional privileges provided by state governments, casinos would not be spreading into mainstream American life as they are today and would likely still exist only on the fringes of the society.

Government's partnership with gambling has failed in at least three major ways:

- 1) It has transformed gambling from a private and local activity into the public voice of American government, such that ever-increasing appeals to gamble, and ever-expanding opportunities to gamble, now constitute the main ways that our government communicates with us on a daily basis.**
- 2) It has failed to deliver on its over-hyped promises to fund education, lower taxes, or pay for needed public services.**

There is not a state in the country that can point to its gambling program and say it delivered on what was promised citizens. The list of failures seems almost endless...here are two of the most

recent. The four Ohio casinos are on pace to gross about \$868 million this fiscal year, less than half of what was promised in 2009. The Ohio Department of Taxation estimated in 2009, before the vote, that the casinos would generate \$1.9 billion in annual tax revenue. ¹

Last month, Atlantic City officials announced the city itself could face bankruptcy after a recent decision by a New Jersey Tax Court to award the city's largest employer and taxpayer - Borgata Casino - a \$48.8 million property-tax reduction, plus interest, that the city will have to refund. At the same time the casino was reducing its tax liability it was securing the privilege of the first online gambling license in the state.

Atlantic City's substantial decline in gambling revenue since 2006 has already triggered a wave of successful tax-assessment appeals by several casinos between 2009 and 2012. At least two - Atlantic Club and Golden Nugget - said last week they planned to seek new assessments to lower their tax liability even more, shifting the burden to residential and other smaller property taxpayers to make up the city's projected revenue loss.²

But not only have they failed to provide the promised revenue, in many instances, some states are subsidizing failing casinos. When casinos come up short, states usually provide new infusions of money, reduced taxes, reduced funding for gambling addiction measures, or other concessions such as lifting smoking bans, in order to sustain revenues and profitability. Rhode Island, Delaware, and New Jersey have all taken special steps to help casinos that might otherwise fail.

Is there a better example how government's partnership with gambling has failed than Atlantic City? After 40 years of casinos and billions of dollars spent and lost in the city, Atlantic City still has a 30% poverty rate and 18% unemployment rate.ⁱⁱⁱ

3) Perhaps most importantly of all, government-sponsored gambling has contributed to patterns of inequality in America.

As gambling has spread into economically distressed communities, it has lured more Americans in the lower rungs of the income ladder. Low-income workers, retirees, minorities, and the disabled make up disproportionately large shares of regional casino patrons and lottery players.^{iv}

In this way, state-sponsored gambling creates a stratified pattern that parallels the separate and unequal life patterns in education, marriage, work, and play that increasingly divide America into haves and have-nots.^v Those in the upper ranks of the income distribution rarely, if ever, make it a weekly habit to gamble at the local casino or buy lottery tickets regularly. Those in the lower ranks of the income distribution often do. Those in the upper ranks rarely, if ever, contribute a large share of their income to the state's take of gambling revenues. Those in the lower ranks do.

Despite the false claims by gambling operators and the public officials that their player base is from the well-to-do, the abundance of penny and nickel slot machines as well as the locations where regional casinos and lottery retailers are positioned reveals who their audience really is.

Many forces currently contributing to the rise of inequality, such as globalization and technological change, cannot be directly controlled by public policy. But government-sponsored gambling *is* a public policy – and it exists only because policy makers want it to exist.

Why would any reasonable person believe the result will be any different if internet gambling is allowed to be sponsored and promoted by the government?

The fact that states are now forcing internet gambling onto their citizens underscores how extreme government's promotion of gambling has become and how badly the policy has failed. And forcing is the right word: on the day before NJ state government kicked off its internet gambling program, Farleigh Dickinson University released a poll showing voters in the state are still opposed to making casino gambling so accessible to their families.^{vi}

Young People and Gambling

According to a *Wall Street Journal* report, only 1.8 million people played poker for money in the U.S. in 2010- that is only 1/2 of 1% of all Americans.^{vii} The reason for the costly lobbying push is gambling operators want tens of millions of Americans, especially our nation's youth, to lose their money gambling online...a lot more than a tiny 1/2 of 1%.

No demographic is a bigger target for the casino operators lobbying for internet gambling than America's kids. In a very short time, social gaming has mushroomed into a multi-billion dollar industry. Zynga which accounts for 12 per cent of all Facebook's revenues due to its games such as Farmville, launched Zynga Slots in the UK in June 2012, while the world's biggest online gambling company, bwin.party, announced it launched its own social gaming operation.^{viii}

It's patently untrue when proponents say "regulating" internet gambling would lessen the amount of addicted citizens. Land-based casinos- owned by most of the very same gambling operators lobbying for internet casinos – take as much as 60% of their profits from problem gamblers.^{ix} With their long track record of exploiting problem gamblers as a major part of their business model, how can any credible person conclude giving these casino operators the exclusive right to run internet casinos would have a different result?

It's well-established that the younger the children start gambling, the more likely it is they will become habitual gamblers and also problem gamblers.^x By government sponsoring online gambling, it sets up these kids to be problem gamblers as they go through life.

Internet gambling is the most addictive form of gambling. Almost 1 out of 2 internet gamblers (42.7%) can be classified as problem gamblers, according to a report by prominent international gambling addiction researcher Dr. Robert Williams who presented at the National Council on Problem Gambling Conference in 2011.^{xi}

Internet Gambling Represents an Epic Expansion of Government’s Partnership with Gambling

The latest push for internet gambling is another example of the casino gambling lobby’s playbook which has been based on presenting seemingly-innocuous gambling bills to legislators, yet in reality resulted in epic expansions of casino gambling onto Main Street across America.

The current lobbying campaign purports to fix something not broken: no one presently is barred in the United States from playing poker online—they just can’t legally gamble on it for money or other assets of value. People can, however, play poker online without wagering assets or, if wager they must, they can wager valueless points, for example, and still entertain themselves, compete, sharpen skills, and gain prestige as superior players. Thus, the bill’s true purpose is *not* to enable online poker but to enable online *gambling*.

This kind of deceptive campaign was used in 1988 when Congress passed the Indian Gaming “Regulatory” Act which many members were led to believe they were supporting small tribal bingo parlors and card clubs in rural areas of the country. In reality, IGRA was the starting gun for the massive and unrelenting wave of casino gambling that has spread across most states.

Because of the purposely vague way the proponents of IGRA defined the various forms of gambling permitted under the law, casino interests pushed the scope of the law to unimaginable proportions never intended by Congress. While nearly every state has its own story about the failure of IGRA, Connecticut’s may be Exhibit A. Anxious to take advantage of the state’s position between the metro New York and Boston population centers, gambling interests used IGRA to build two of the biggest casinos in the world, hijacking the state’s “Las Vegas Night” law which had allowed charities to conduct occasional social, small stakes gambling nights for fundraising purposes.^{xii}

Another highly-relevant example of the casino gambling lobby’s playbook in action is “bingo.” Like “poker,” most would consider bingo a less extreme form of gambling. Yet in a deliberate effort to circumvent gambling laws, casino interests designed “electronic bingo machines” which are virtually indistinguishable from casino-style slot machines and forced them into states across the U.S. that permitted traditional bingo games.^{xiii} A similar “slotification” of online poker is entirely predictable.

Internet poker casinos represent a very minor portion of the casino business, largely because the house collects a small part (“the rake”) of each pot. For example, live poker in Nevada makes only a tiny piece of overall gambling revenue.^{xiv} The major profits to be had are in online slots

which make up 65%-80% of all gambling traffic.^{xv} Legalizing internet poker casinos is simply to build the framework for casino interests to bring in online slots.

The ultimate goal for gambling proponents is to legalize casino gambling on social media platforms like Facebook which would represent the biggest expansion of casino gambling in history, opening a Las Vegas casino in every bedroom, office, dorm room and smart phone in America, 24 hours a day, seven days a week, 365 days a year.

Internet gambling lobbyists are fond of saying people are already experiencing problem gambling on the internet and argue it is a reason why it should be legalized. Think about the logic of that argument: this is the only social problem where the solution is we need *more* of it. There isn't one harmful, shady activity in the entire United States that we need to increase and officially promote on the grounds that some of the social problems related to it are "already here."

While some people are gambling online already, it's very few. To draw people to their internet casino sites and encourage citizens to gamble online, New Jersey casino operators are now running aggressive ad campaigns on all forms of media.^{xvi}

"Prohibition didn't work."

The policy failure of alcohol prohibition is often held up by gambling operators to rationalize expanding government's partnership with gambling. While the prohibition of alcohol may have been a failed policy, commercial gambling was successfully criminalized nearly everywhere in the United States for most of the 20th century.

But what about this so-called "freedom to gamble" argument? Is it the government's job to prohibit whether people want to gamble? While citizens have every right to engage in a destructive obsession, the government has no business encouraging them. Government, in this case, is not merely permitting private, consensual behavior. It is granting monopolies and awarding regulatory advantages to favored firms.

The misleading cry for "regulation" by those who would gain the privilege of such a monopoly begs this question: if the illegal online gambling operators supposedly cannot be controlled, how can you control and regulate the ones you license? If you can't shut out the illegal operators, how would you possibly shut down licensed operators who don't follow the rules?

There are also some who argue that the amount of illegal gambling will go down if government gets into the gambling business. Whether it is lotteries, casinos or internet gambling, *there is no*

evidence from any jurisdiction that illegal gambling has gone down after legalizing commercial gambling.

With the zeal of a teetotaler, there is one memorable and telling trait that those who employ the “Prohibition doesn’t work” message have in common: they don’t gamble themselves. Gary Loveman, CEO of Caesars, Jim Murren, CEO of MGM and Steve Wynn, just to name a few, don’t lose their money gambling on slot machines or other casino games.^{xvii}

Even the people who design the slot machines don’t use them themselves. In 2004 *New York Times* reporter Gary Rivlin toured the headquarters of International Gaming Technology (IGT), America’s biggest maker of electronic slot machines, and who today has designed a leading platform for internet gambling. Rivlin tells the story of his visit to the IGT building: “Most of the people I met inside I.G.T. told me they never played slot machines on their own time. Even one corporate P.R. staff member couldn’t resist shaking her head in disbelief as she described scenes of people lining up to play a new machine. ”It was unbelievable to me,” she told me. When I asked one I.G.T. artist if he ever plays, he acted as if I had insulted him. ”Slots are for losers,” he spat, and then, coming to his senses, begged me to consider that an off-the-record comment.”^{xviii}

Slots are for losers, he said. The problem here is that some of those “losers” happen to be your constituents.

“We’re providing people entertainment”

David Blankenhorn, a scholar and President of The Institute for American Values in Manhattan, wrote a wonderful column recently examining the highly misleading claim that government’s partnership with gambling is simply nothing more than offering citizens “entertainment.” Here is an excerpt from his column in the Winter 2014 edition of *The American Interest*:

“To hear them tell it, it’s all about how we choose to “entertain” ourselves. Some choose the opera, others prefer baseball games, and some choose casinos. The gambler—sorry, the person being “entertained” by the casino—is alleged to be saying, in effect, “I enjoy betting, and I pay for the pleasure, just as you pay for travel or the theater.”

Sorry. Entertainment, as a dictionary will tell you, is activity that aims to delight, amuse or please. Sometimes it involves a financial exchange (buying a concert ticket), and sometimes it doesn’t (playing charades). When a financial exchange is involved, the exchange (buying the ticket) exists only to facilitate something else (enjoying the concert). But gambling is always and in essence a financial exchange. Any entertainment connected to the exchange—any pleasure, excitement or stimulation—stems from the

exchange itself and cannot exist without it. (Would people go to casinos if no one could win or lose money in them?)

Gambling, then, is a non-instrumental financial exchange, which takes place not in order to facilitate something else, but for its own sake. Conflating the terms “gambling” and “entertainment” therefore constitutes a category mistake. It is disingenuous to claim that the former can be a sub-category of the latter. There is some subtlety to acknowledge here, just as there is subtlety in other comparisons of non-alike experiences. For example, some people prone to violence may be delighted or entertained by killing their enemies. Some people suffering from depression may derive pleasure from getting drunk with their friends. But neither murderers nor drunkards have ever proposed that murder and drunkenness are simply two forms of entertainment, because to do so would constitute an obvious attempt to mislead.

All forms of casino gambling have in common numerous characteristics that don't exist in actual entertainments, such as attending your daughter's soccer game or listening to music. For example:

- No other form of “entertainment” causes significant harm to people who “enjoy” it frequently, including the loss of thousands of dollars per hour.
- No other form of “entertainment” depends on profits generated by those who suffer from problems of addiction linked to the entertainment.
- No other form of “entertainment” is often urged (and typically refuses) to provide information to those being entertained about its risks.
- No other purported form of “entertainment” requires such high levels of taxation, regulation and government oversight when it constitutes a business as opposed to a private, small scale activity and, most regrettable of all:
- No other form of “entertainment”, in recent times, is heavily promoted by government.

Here is the rule of thumb: If a practice is basically dishonest, its advocates will speak of it dishonestly. They will call it by wrong names. They will allege that its purposes are other than what they are. They will engage in this fraudulent language partly to hide the dishonesty of the actual activity, and partly because they themselves are at least somewhat ashamed of what they are doing.^{»xix}

A primary reason why gambling operators promote the impression they represent “entertainment” is to hide the fact that a large proportion of casino revenue comes from problem and pathological gamblers. Problem gamblers account for 40 to 60 percent of slot machine revenues.^{xx} Casual gamblers, despite all the public relations by gambling interests to the contrary, are virtually irrelevant to their profits. A Canadian study found that people who follow responsible gambling guidelines made up 75% of the players *but contributed only 4 percent of net gambling revenue.*^{xxi}

(At the end of my testimony is a copy of the must-read Appendix from “Why Casinos Matter” which offers eleven independent, respected studies that researched the question of “How Much Gambling Revenue Comes from Problem Gamblers?”)

“Only 1% of Americans have a problem”

For many years, gambling operators have avoided denying their business practices led to life-changing addictions for millions of Americans. Instead, they have deliberately sought to minimize the problem. One way they have tried to achieve this is by promoting the notion that only 1% of Americans are hurt by government sponsorship of gambling, notwithstanding the fact they funded the research.

At the 2011 National Conference on Problem Gambling in Boston, I appeared on a panel with Christine Reilly, a spokeswoman for the National Center of Responsible Gaming (NCRG) which does casino-funded gambling addiction research. After Reilly repeated the 1% claim again, I turned to the audience of more than 500 problem gambling treatment professionals from across the U.S. and asked them to raise their hand if they, the people who are on the front lines of helping those with dealing with gambling addiction in America, believe that number was a true indicator of what was happening across the country. *Not a single hand went up in the entire ballroom.*

The NCRG promotes itself as an organization that funds peer-reviewed, independent research on gambling addiction. However, a recent analysis by Barbara Whitehead of The Institute for American Values found

“NCRG’s research funding and agenda is largely devoted to scientific investigations into the biology of pathological gambling, including its diagnosis and treatment. Of the 200 peer reviewed studies it has funded, not a single one investigates the interplay between gamblers and the gambling machines; the addictive nature of modern gambling machines; or the industry’s own research into designing more addictive machines.

Many scholars have criticized the one percent figure as misleading. It is based on a survey of the general adult population—a significant proportion of whom do not gamble

at all. Moreover, it counts only the most severe form of problem gambling—typically people who exhibit three or more clinical symptoms used in the scoring diagnosis of mental health disorders. It excludes gamblers who have less severe gambling problems and people whose lives and livelihoods may be adversely affected by their gambling but who do not meet any of the criteria of a mental health diagnosis.”

Conclusion

Internet gambling presents an opportunity for us as a country to reexamine government sponsorship of gambling. Who has really benefitted from this policy over the last forty years? Only one group can be considered a “winner” and it is the gambling operators themselves.

Government’s experiment with gambling has failed and it’s time we took government back out of the gambling business.

**Appendix excerpted from “Why Casinos Matter” by Barbara Whitehead,
Institute for American Values, September 2013**

How Much Gambling Revenue Comes from Problem Gamblers?

Proponents of casino gambling often say that casinos provide entertainment for many Americans who enjoy occasional gambling. They almost never say that a large proportion of casino revenue comes from problem and pathological gamblers.

Evidence from scholarly studies on the relationship between casino income and problem gambling consistently and robustly points to the conclusion that casinos disproportionately rely on problem and pathological gamblers for their revenue base.

Evidence from Direct Estimates

1. About 35 to 50 percent of casino revenues derive from problem and pathological gamblers.

Source: Earl L. Grinols and J.D. Omorov, “Development or Dreamfield Delusions? Assessing Casino Gambling’s Costs and Benefits,” *Journal of Law and Commerce* 16, no. 1 (1996): 60.

2. About 33.1 to 55 percent of casino revenues derive from problem gamblers (Alberta: 37.2 percent; British Columbia: 33.1; Nova Scotia: 48.7; Iowa: 38.4; New York: 41; Washington: 55).

Sources: Henry R. Lesieur, “Pathological and Problem Gambling: Costs and Social Policy,” Testimony before the Rhode Island House Gambling Commission, October 15, 2002. Henry R. Lesieur, “Costs and Treatments of Pathological Gambling,” *Annals of the American Academy of Political and Social Science* 556, no. 153 (March 1998):

3. About 37.3 percent of gambling expenditure was accounted for by residents with gambling problems.

Source: Tremayne, Kell, Helen Masterman-Smith, and Jan McMillen, *Survey of the Nature and Extent of Gambling and Problem Gambling in the ACT* (Sydney: University of Western Sydney, Australian Institute for Gambling Research, 2001), 10.

4. About 38.4 percent of gaming machine and casino table game revenue derives from problem gamblers.

Source: Australian Government Productivity Commission, *Australia's Gambling Industries, Inquiry Report*, no. 10 (Canberra: Australian Government Productivity Commission, 1999), vol. 3: appendices, 12, http://www.pc.gov.au/__data/assets/pdf_file/0006/82554/gambling3.pdf.

5. About 47.5 percent of gaming machine and casino table game revenue derives from problem gamblers.

Source: Tremayne, Kell, Helen Masterman-Smith, and Jan McMillen, *Survey of the Nature and Extent of Gambling and Problem Gambling in the ACT* (Sydney: University of Western Sydney, Australian Institute for Gambling Research, 2001), derived from p. 114, table 25.

Evidence from Relative Gambling Losses

6. About 50.2 percent of casino revenues derive from problem gamblers.

Australian problem players lose 17 times more than non-problem players. Nine percent of machine players are problem gamblers. Implies 62.7 percent of machine revenue is from problem gamblers. $.627 * .8 = 50.2$ percent. (The .8 multiplier in this note and notes 7–11 derives from 80 percent of casino revenues coming from slot machines.)

Source: Henry R. Lesieur, "Pathological and Problem Gambling: Costs and Social Policy," Testimony before the Rhode Island House Gambling Commission, October 15, 2002.

7. About 54.2 percent of casino revenues derive from problem gamblers. Nova Scotian problem players lose 16 times more than non-problem players. Sixteen percent of machine players are problem gamblers. Implies 67.8 percent of machine revenue is from problem gamblers. $.678 * .8 = 54.2$ percent.

Source: Henry R. Lesieur, "Pathological and Problem Gambling: Costs and Social Policy," Testimony before the Rhode Island House Gambling Commission, October 15, 2002.

Evidence from Gambling Machine Revenue Shares

8. About 33.8 percent of casino revenues derive from problem gamblers.

About 42.3 percent of EGM (electronic gaming machine) revenue came from people with gambling problems.

Source: Australian Government Productivity Commission, *Australia's Gambling Industries, Inquiry Report*, no. 10 (Canberra: Australian Government Productivity Commission, 1999); $0.8 \times .423 \Rightarrow 33.8$ percent.

9. About 38.6 percent of casino revenues derive from problem gamblers.

About 48.2 percent of EGM revenue came from people with gambling problems.

Source: Tremayne, Kell, Helen Masterman-Smith, and Jan McMillen, *Survey of the Nature and Extent of Gambling and Problem Gambling in the ACT* (Sydney: University of Western Sydney, Australian Institute for Gambling Research, 2001), 114; $0.8 \times .482 \Rightarrow 38.6$ percent.

10. About 48 percent of casino revenues derive from problem gamblers.

Given the variability associated with different sample sizes and methods for calculating the shares, the combined risk category CPGI 3+ [Canadian Problem Gambling Index] probably gives a more reliable estimate of the relative spending of higher risk gamblers. It ranges from 42 to 74 percent [of total gaming machine spending], with an average of 60 percent.

Source: Australian Government Productivity Commission, *Gambling: Productivity Committee Inquiry Report*, no. 50 (Canberra: Australian Government Productivity Commission, 2010), vol. 2, app.B, B11, http://www.pc.gov.au/__data/assets/pdf_file/0003/95682/gambling-report-volume2.pdf; $0.6 \times .8 \Rightarrow 48$ percent.

11. About 49.6 percent of casino revenues derive from problem gamblers.

About 62 percent of machine revenue is derived from problem gamblers.

Source: Robert Williams and Robert Wood, *The Demographic Sources of Ontario Gaming Revenue, Final Report*, prepared for Ontario Problem Gambling Research Centre (Ontario:

Ontario Problem Gambling Research Centre, 2004), 42, table 17, “Proportion of Revenue Derived from Problem Gamblers as a Function of Type of Gambling”; $0.8 * .62 \Rightarrow 49.6\%$

ⁱ *The Columbus Dispatch*, Dec. 8, 2013 <http://www.dispatch.com/content/stories/local/2013/12/08/casinos-fall-short-of-revenue-projections.html>

ⁱⁱ “Stung by tax ruling, Atlantic City braces for the worst,” By Suzette Parmley, *Philly Inquirer* Staff Writer, October 28, 2013

ⁱⁱⁱ “Millions spent on casinos didn't help Atlantic City,” *USA Today*, June 11, 2013 <http://www.usatoday.com/story/news/nation/2013/06/11/atlantic-city-casinos-money-squandered/2412791/>

^{iv} “Why Casinos Matter” by Barbara Whitehead, Institute for American Values, Sept. 2013

^v “Why Casinos Matter” by Barbara Whitehead, Institute for American Values, Sept. 2013

^{vi} Farleigh Dickinson University PublicMind Poll, Dec. 2013 <http://publicmind.fdu.edu/2013/doubt/>

^{vii} *The Wall Street Journal*, April 18, 2011, <http://blogs.wsj.com/in-charge/2011/04/18/time-to-fold-em/>

^{viii} *The Daily Mail UK*, July 15, 2012. “Facebook 'creating a generation of gambling addicts because of site's Las Vegas style games.’” <http://www.dailymail.co.uk/news/article-2174024/Facebook-creating-generation-gambling-addicts-sites-Las-Vegas-style-games.html>

^x National Council on Problem Gambling, 2012. <http://www.ncpgambling.org/i4a/pages/index.cfm?pageid=3390#kidsteens>

^{xi} “Internet Gambling: Prevalence, Patterns, Problems, and Policy Options,” by Dr. Robert Williams, <http://www.gamblingresearch.org/content/research.php?appid=2285>

^{xii} *Boston Globe Magazine*, Charlie Pierce. “High Stakes.” July 30, 2006 http://www.boston.com/news/globe/magazine/articles/2006/07/30/high_stakes/

^{xiii} “Is It Bingo, Or A Slot Machine?” *Gambling and the Law*, Professor I. Nelson Rose, Whittier Law School, 2002. <http://www.gamblingandthelaw.com/columns/90-82nigcregulations.html>

^{xiv} *Card Player*, December 3, 2012. <http://www.cardplayer.com/poker-news/14556-commercial-casinos-in-full-court-press-to-legalize-online-poker-during-lame-duck>

^{xv} “Why are online slots so popular?” *Casino City Times*, June 8, 2011. <http://www.casinocitytimes.com/news/article/why-are-online-slots-so-popular-197594>

^{xvi} “Bet on it: Online gaming ads to swamp market,” *Ashbury Park Press* (NJ), Dec. 2, 2013 <http://www.app.com/article/20131202/NJNEWS10/312020013/Bet-Online-gaming-ads-swamp-market>

^{xvii} “The Smartest Guys NOT in the Room,” <http://www.youtube.com/watch?v=a0IVTsTrgcs>, 2012

^{xviii} [The Tug of the Newfangled Slot Machines](#) by Gary Rivlin, *The NY Times Magazine*, May 9, 2004

^{xix} “Wanna Bet,” Winter 2014 edition of *The American Interest*, by David Blankenhorn, Institute for American Values
New York’s Promise: Why Sponsoring Casinos Is a Regressive Policy of a Great State,” by David Blankenhorn, Institute for American Values, Oct. 2013

^{xx} “Addiction By Design,” by Dr. Natasha Schull of The Massachusetts Institute of Technology, 2012.
<http://press.princeton.edu/titles/9156.html>

^{xxi} “Addiction By Design,” by Dr. Natasha Schull of The Massachusetts Institute of Technology, 2012.
<http://press.princeton.edu/titles/9156.html>