



June 6, 2010

Attorney General Martha Coakley
Office of the Attorney General
One Ashburton Place
Boston, MA 02108

Dear Attorney General Coakley:

On behalf of the grassroots volunteer leaders across the Commonwealth making up United to Stop Slots in Massachusetts (USS Mass), I would like to thank you for your previous testimony cautioning the Legislature on the multitude of criminal, corruption and law enforcement matters related to legalizing expanded predatory gambling, slots and casinos.

We were particularly pleased when you led the state's District Attorneys and a group of legislators in filing "An Act to Combat Economic Crime," a critically important bill meant to protect the people of the Commonwealth we know fall victim to the culture which inevitably follows casinos. At the time of the bill's release, you said, "it is critical that we have the statutory structure in place to address the types of financial crimes and corruption that may be associated with legalized gaming." When asked what the regulatory framework would cost you replied "very expensive." Yet, no cost analysis has been performed.

That is why your current silence on the weak and, in many cases, non-existent consumer protection provisions in the proposals to expand predatory gambling, slots and casinos is particularly concerning. We reiterate requests we and our supporters have made to your office that you offer an analysis of and changes to these provisions in testimony before the Senate in its lone public hearing Tuesday.

There are multiple consumer protections that must be brought forth to the Legislature and enforced by the AGO.

Some of those we recommend would:

- Require slot machine designs in use in Massachusetts to be certified as non-addictive by a group of qualified Massachusetts-based neurologists and specialists;
- Require a whistleblower provision that would allow any family member who was concerned about a growing gambling problem to call a hotline number and have that person automatically placed on the watch or do-not-play lists;

- Require that any gambling law must meet or exceed the strongest recommendations made by the Massachusetts Council on Compulsive Gambling -- or best practice nationally -- as personally certified by the Attorney General and the Governor;
- Require that the state Treasurer certify annually and publicly that casino gambling has not damaged the Lottery, or state aid, or caused an increase in any other financial costs to the state, or an increase in compulsive gambling;
- Require CORI background checks for all owners, developers, investors in proposed class III gambling bids prior to final licensing;
- Require slot machines to pause, clear screen of all usual visual clutter, and on an otherwise blank screen, notify customer how much they have lost with every multiple of \$25 lost. Require customer to click "OK" in order to proceed to next bet;
- Establish a betting limit per credit card, and set up machines so that both losses (charges) and payout (credit) accrue to the credit card;
- Require that the odds of winning and expected payout on a dollar bet be posted on every slot machine and at every gaming table.

The lack of consumer protections by the House, including outright rejection of thoughtful and prudent amendments proposed on this topic is of grave concern to USS Mass and should be to your office, to the eight District Attorneys and seven members of the House and five Senators who stood with you.

Our coalition is requesting your presence, your powerful voice and recommendations for the strongest consumer protection guidelines and standards regarding slots/casinos at the public hearing on Tuesday which is, sadly, the lone time the public will be heard in this fast-moving legislative debate.

Taxpayers of the Commonwealth deserve to know that you and the Legislature have addressed – before this legislation passes – the obvious and measurable economic, criminal and societal damage casino gambling will bring and the very real ways it will deteriorate the fabric of our state over time.

We are certain that you would agree based on your past testimony, that criminal and consumer protections with no unfunded mandates must be paramount in any proposed gambling legislation. An independent cost analysis which you, Governor Patrick and many other thoughtful statewide leaders support has not been performed for this bill, its economic, criminal or consumer protections.

Specifically, an analysis of the costs for new technology, equipment, surveillance, personnel, court, corrections and local law enforcement has been apparently ignored by leadership in both

the House and Senate in their rush for what they wrongly perceive as an easy revenue and jobs payday.

We regret that you have not yet publicly exercised your leadership in this important debate and its meaningful impact on the areas your office is specifically charged with regulating and enforcing and we call upon you to direct the full resources of the Attorney General's Office to address these critical issues at the upcoming hearing.

We would like to share our appreciation of the efforts by Assistant Attorney General Jennifer Stark, who has served as a liaison to USS Mass. We look forward to hearing from you as soon as possible and hearing your testimony at the public hearing on Tuesday.

Warm regards,

Kathleen Conley Norbut

Kathleen Conley Norbut, M.Ed., LMHC

President

United to Stop Slots in Massachusetts

Cc: Governor Deval L. Patrick
Senate President Therese Murray
Speaker Robert DeLeo
Governor Michael Dukakis
Former AG, Scott Harshbarger
USS Mass Board of Directors