

Joe Richardson commentary on MIGA testimony of March 1, 2019 – House Commerce Committee.

Black & Red text is McCarthy's testimony highlighted  
Blue text in brackets is my commentary

On: Minnesota Tribal Gaming Association Letterhead  
Dated: February 28, 2019

Madam Chair Halverson and Representative Lien:

The Minnesota Indian Gaming Association (MIGA) represents all eleven of the federally recognized native American tribes across the state. On behalf of our elected tribal leaders, the association appreciates the ability to provide concerns regarding HF356, a **bill that would authorize an electronic form of paddlewheel.** *[Electronic forms of paddlewheel are in statute; however, the statute continues to require paper tickets being used with each and every wager, even when an electronic table could replace such expensive paper.]*

Since its inception, MIGA **has opposed all expansion of gambling in Minnesota.** After careful study and review of HF356, MIGA believes the change in law would **drastically alter the nature of the current Paddlewheel game** and would in fact expand gambling in the state. *[The paddlewheel with table and chips has been used since 1987 in Minnesota. How is reducing the wasteful paper "drastically altering the nature" of the game?]*

If enacted, HF365 [sic] would authorize an **increase in the number of electronic gaming devices in bars** *[the 2012 legislation provided for electronic paddlewheels. This bill reduces the paper and provides a regulatory process.]* and restaurants and **raise the prize limits on and individual wager from \$70 to \$1,000.** *[Mystic Lake Casino has over a million dollar prize from slot machines: <https://www.mysticlake.com/casino/progressive-slots> and \$5,000 pull tab prizes and \$36,000 Bingo Jackpots]* The bill would also **allow players to bet on up to 10 upcoming bets on one "ticket,"** *[to environmentally minded people the reduction in paper is a virtue. Not only is the existing paper printed in Nebraska, shipped in by truck and used for only a couple minutes, the losing paper tickets are placed in local Minnesota landfills. We have an alternative that will reduce waste. Less paper doesn't change what happens with a lot more paper except less paper reduces errors, costs and time taken in auditing a whole lot of paper tickets.]* and **allow the use of symbols on the wheel instead of the simple numbers currently allowed.** *[if an image of a gopher appears on a wheel instead of a numeral – what difference does it make – other than the gopher has more character than the numeral.]* These updates would **change the play and look of the game significantly.** *[players still pick the numbers and symbols on a wheel they wish to bet and are awarded a prize*

*based on their having guessed the number or symbol that appears at the top of the stopped wheel.] Also concerning is the use of random number generation (RNG) through a central server. RNG technology in gaming devices is generally associated with video slot machines, and is the same technology used in similar class III video roulette games found in casinos across the country. [Now we know none of their technical people were involved in writing this testimony. Random number generators or RNGs are a process or mathematically based software program that picks randomly among a set. RNGs are in every electronic game whether or not that game is for amusement or wagering. RNGs operate in electronic pull tabs, raffles and bingo. Having the RNG reside in a central computer networked to the games is far more secure than having such controlling software in dozens of vulnerable and localized computers. The Gambling Control Board requires all electronic games to have their RNG functions scrutinized for fairness – randomness. Would someone want Non-random Number Generators? I note that CAGE used this same very curious argument]*

Again, MIGA appreciates the Committee's attention to its concerns with HF356. The bill's author, Rep. Lien, has always made good faith efforts to consult the state's tribes to craft legislation that would strengthen Minnesota's charitable gaming industry without harming the critically important tribal gaming operations that support tribal members and communities. *MIGA and its representative hope to continue these discussions in the future, but at this time must oppose HF356. [They have stopped similar legislation since the 2013 session without once attempting to have a serious conversation over the details. I have called and emailed Mr. McCathy on numerous occasions over the years asking for a meeting and they do not care to get back. They have been invited to provide input by Rep. Lien and have yet to present any ideas. They have been to my Websites looking at the proposed electronic wheel game adaptations from the existing manual games. They sound as though they are surprised to see the legislation – after years of their leaning on committee chairs in the House to keep it from being heard.*

*This is a wholly disingenuous statement aimed at sounding reasonable to those who don't know the history of this corrective legislation. They just want to punt it down the road again, and again, and again...]*

Signed: John McCarthy, Executive Director, Minnesota Indian Gaming Association  
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