

February 9, 2021
HCR 3012 Internet Live Poker

Good morning, Chairman Klemin and the members of the committee

My name is Collette Brown from Warwick, representing the Spirit Lake Tribe. My professional title in the gaming industry is, Gaming Commission Executive Director of the Gaming Regulations and Compliance Department, our casino is located seven miles south of Devils Lake. I am here to oppose HCR 3012.

I firmly believe this bill needs to be study so you all can truly understand all the aspects of internet poker. The study should look at the other states that have introduced any internet poker game types.

I believe your study should identify:

- Full background of any federal laws that will apply to this type of games offered
- define what games are poker games, will it only be ultimate Texas hold'em or any carnival card game
- costs associated with a creation of a division under the AG or a whole new Regulation division or maybe an actual Gaming Control Board
- the cost of an IT infrastructure for cyber security and data privacy
- the location of servers, and backup processes of servers will they be in the state or out of state
- A complete financial background of the vendor provider and all parties associated with those vendors
- dissemination and enforcement of state laws, and regulations
- testing, approving and/or disapproving software, hardware, and other equipment
- payment processors and entities that provide customer identity, age verifications along with geo-location services costs
- Federal Title 31 reporting, unusual or suspicious activity standards are needed, a Know your customer program as well, and who will be responsible for those filings with the department of treasury or the financial crimes network.
- will there be a constant surveillance of wagers to help identify problem gamblers
- development of the cost of a license to offer internet poker along with a tax structure
- Who will stay on top of the constant evolution of regulations and games
- How many FTE's will be needed for all these areas?

Those are my reasons that must be considered and identified. This House Concurrent Resolution should be amended to a Legislative Management Study.