

# GREY2K USA WORLDWIDE



## Directors

Christine A. Dorchak, Esq.  
*President*

Eric Jackson, *Vice President*  
*Greyhound Companions of*  
*New Mexico*

Fred Barton, *Secretary*  
*Michigan Greyhound Connection*

Sherry Mangold, *Treasurer*  
*Animal Protection of New Mexico*

Kelly Driscoll

Tom Grey  
*Stop Predatory Gambling*

Jay Kirkus

Albano Martins  
*ANIMA Macau*

Darren Rigg  
*Greyhound Adoption Center*

Charmaine Settle

Jeroen van Kernebeek  
*Four Paws*

Carey M. Theil  
*Executive Director*

## Directors Emeritus

Dr. Jill Hopfenbeck, DVM  
Kevin Neuman KREGAP  
Michael Trombley, CPA

## In Memoriam

Kathy Pelton

*Organization Listing is for*  
*Identification Purposes Only*

February 8, 2022

Chair Floyd Prozanski  
Senate Committee on Judiciary and Ballot Measure 110 Implementation  
900 Court St. NE  
Salem, OR 97301

RE: Testimony in support of Senate Bill 1504

Dear Chair Prozanski,

On behalf of our more than 150,000 supporters, I would like to thank you for the opportunity to provide testimony in support of Senate Bill 1504. I hope this information is helpful as you consider this good legislation.

### Current status of the greyhound racing industry in the U.S.

Greyhound races are currently held at four tracks in the United States: Iowa Greyhound Park in Dubuque, Southland Park in Arkansas, Wheeling Island in West Virginia, and Tri-State Greyhound Track in West Virginia.<sup>i</sup> Iowa Greyhound Park and Southland have both announced they are permanently ending racing in 2022.<sup>ii</sup> With those closures, only two operational dog tracks will exist nationwide.<sup>iii</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 nearly \$3.5 billion was wagered on greyhound races annually.<sup>iv</sup> Today, this number has been reduced to \$500 million nationwide.<sup>v</sup>

Greyhound racing is currently illegal in 41 states.<sup>vi</sup> In 2018 Florida citizens voted to outlaw dog racing by a decisive vote of 69% to 31%.<sup>vii</sup> A decade earlier, Massachusetts voters abolished dog racing by a tally of 56% to 44%.<sup>viii</sup> As a result of animal welfare concerns, state legislatures have recently outlawed greyhound racing in Arizona (2016),<sup>ix</sup> Colorado (2014),<sup>x</sup> New Hampshire (2010),<sup>xi</sup> and Rhode Island (2010).<sup>xii</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 dogs 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>xiii</sup>
- Between 2008 and 2019, a total of 16,713 greyhound injuries were documented nationwide. The most commonly reported injury was a broken leg. Other injuries included head trauma, electrocution, and broken backs.<sup>xiv</sup> During the last year of racing at Oregon's only track, Multnomah Greyhound Park, 107 injuries were reported including dogs that suffered broken legs, lacerations, and other broken bones.<sup>xv</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>xvi</sup>
- Female greyhounds are routinely given doses of a dangerous anabolic steroid, methyltestosterone, to prevent a loss of race days.<sup>xvii</sup> Also, greyhounds have repeatedly tested positive for cocaine at racetracks in multiple states.<sup>xviii</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>xix</sup>

### Oregon's role in propping up greyhound racing

A majority of dog race wagers are now made over the internet, via Advance Deposit Wagering companies. Oregon is one of only two states, with North Dakota,<sup>xx</sup> that allow internet gambling companies to process racetrack bets.<sup>xxi</sup> These gambling hubs operate under the dubious legal theory that bets placed by gamblers wagering from outside Oregon occur in Oregon, because that is where the processing centers are located.<sup>xxii</sup> The last operational dog track in Oregon, Multnomah Greyhound Park, closed in 2004. However, state law still allows commercial greyhound racing, and gambling on dog races.

We estimate that roughly 97% of all ADW bets being processed in Oregon are on horse races, and only 3% on greyhound racing.<sup>xxiii</sup> Approximately \$200 million in dog race wagers is being funneled through the Oregon ADW hubs, which would represent 40% of all greyhound gambling in the United States.<sup>xxiv</sup>

### Involvement of foreign dog tracks

Foreign dog tracks in Ireland, the United Kingdom, Australia and Mexico are using the Oregon ADW Hubs to facilitate bets from American gamblers.<sup>xxv</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 the stated goal to “keep bettors engaged and drive betting revenue.”<sup>xxxvi</sup> This new betting service coincided with the end of greyhound racing in Florida, and is intended to prop up greyhound racing in the United Kingdom and Ireland. These wagers are being processed in Oregon.

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 are necessary to sustain racing, and unwanted greyhounds are sometimes killed at slaughterhouses.<sup>xxvii</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>xxviii</sup> In May 2021, the British government included greater protections for greyhounds in its official agenda and Queen’s speech.<sup>xxix</sup> Similar efforts are underway in Wales,<sup>xxx</sup> Scotland,<sup>xxxi</sup> and New Zealand.<sup>xxxii</sup>

We are particularly concerned about the welfare of dogs at a racetrack in Tijuana, Mexico, named Agua Caliente. There are no animal welfare standards at Caliente, and the facility is one of the worst dog tracks in the world. Several companies, including US Off Track, are currently using the Oregon hubs to process wagers on races from Caliente. Dogs at Caliente regularly compete with fewer rest days than at American dog tracks.<sup>xxxiii</sup> This likely leads to higher injury rates, although Caliente does not provide the public with any data on greyhound injuries or deaths. The owner of Caliente, Jorge Hank Rhon, has also been linked to the trafficking of endangered wildlife on numerous occasions. In 1991 he 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. 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>xxxiv</sup>

### Regulatory failures

In 2021 we asked the Oregon Racing Commission for data on the total amount gambled via ADW companies on horse races versus dog races. The Commission responded by stating, in part:

*“The Oregon Racing Commission does not get totalizator reports for our advanced deposit wagering handle broken out for different breeds or animals.”<sup>xxxv</sup>*

It appears to us that the Commission simply does not know how much in greyhound bets are being processed in the state, a basic fact that is necessary for effective regulation. Similarly, we have found no evidence that the Commission knows which dog tracks ADW companies are processing bets for, where these tracks are located, or whether there are even minimum animal welfare standards in place to protect the dogs at the tracks from which they are processing bets. We have reviewed thousands of pages of license applications, biennial audits and other records, and have found no information on these points whatsoever.

## Regulation limiting ADW betting is ignored

A longstanding regulation mandates that ADW accounts can only be established for people outside Oregon if "wagering on that same type of live racing is lawful in the jurisdiction which is the natural person's principal residence." (emphasis added)<sup>xxxvi</sup> Wagering on live greyhound racing is only legal in the nine states of Alabama, Arkansas, Connecticut, Iowa, Kansas, Oregon, Texas, West Virginia and Wisconsin. This regulation should limit ADW companies, allowing them to only offer greyhound bets to account holders in those states.

In 2021 we had volunteers across the country set up test accounts to ascertain whether ADW companies are allowing bets that violate this regulation. We were able to identify apparent violations in Colorado, Florida, Massachusetts, Montana, New Hampshire, New Mexico, New York, Ohio, Oklahoma, and Pennsylvania.<sup>xxxvii</sup> Some of these states appear to be egregious violations. For example, a volunteer was able to open an account to place bets on dog races in Oklahoma, despite the fact that gambling on greyhound racing and Advanced Deposit Wagering are both illegal in the state.<sup>xxxviii</sup>

We obtained operational plans that had been submitted to the Oregon Racing Commission, which confirm that ADW companies have knowledge of the regulation they are violating. The Operational Plan for US Off Track, for example, states that "to establish an account, an applicant must ... reside in a jurisdiction where wagering on the same type of live racing is lawful." We submitted a complaint to the Oregon Attorney General regarding this illegal gambling on September 24, 2021.

## Arguments Made by Advance Deposit Wagering Companies

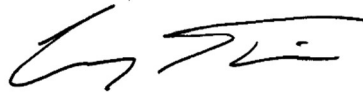
The last time greyhound protection legislation was considered by the Oregon legislature, a few ADW companies threatened to leave the state if the bill was adopted. This threat should be viewed skeptically, for the following reasons:

- The vast majority of racetrack bets being processed in Oregon are on horse races, not dog races, and all of the companies in question are processing horse wagers. It's inconceivable they would voluntarily cease this wagering activity.
- The companies in question are well aware that greyhound racing is gradually ending, and in fact one company (US Off Track) is owned by three Florida dog tracks that were outlawed by voters in 2018. These gambling operators have already begun to diversify. For example, US Off Track is already offering betting on virtual dog races, with the wagers being processed via their Oregon ADW hub. Again, it defies common sense that this wagering would voluntarily cease, and a multi-faceted gambling operator would simply relinquish a valuable betting license, because one form of wagering is phased out. US Off Track also presumably profits from a call center it operates, that is used by many ADW companies in Oregon.
- We have expressed a willingness to work with ADW companies to alleviate their concerns. In September of 2021 GREY2K USA and the Center for a Humane Economy sent a letter to all six companies currently using Oregon to process dog racing bets, notifying them of our concerns and requesting a dialogue. We received no response.

- SB 1504 does not end gambling on greyhound racing immediately, but instead phases it out over sixteen months. This allows ample time for ADW companies to make a successful transition and focus on other aspects of their business.
- Although a second state, North Dakota, also hosts ADW hubs, Oregon is considered the “gold standard” for ADW hub betting, due to its low tax rate, lax regulatory oversight, and longtime acceptance of the legal theory that the bets occur in Oregon.

In closing, this is an important bill that will help thousands of greyhounds around the world. As a native Oregonian, I believe greyhound racing goes against our values as a state. I urge you to support Senate Bill 1504, and cast a vote for the dogs.

Respectfully,



Carey M. Theil  
Executive Director

<sup>i</sup> TrackInfo, <https://www.trackinfo.com/> (accessed February 7, 2022).

<sup>ii</sup> Boshart, Rod, “Last lap coming for Iowa greyhound racing,” *The Gazette*, December 3, 2021, <https://www.thegazette.com/state-government/last-lap-coming-for-iowa-greyhound-racing/> (accessed February 7, 2022); Wickline, Michael R., “Phaseout OK’d for Arkansas dog races,” *Arkansas Democrat-Gazette*, October 18, 2019, <https://www.arkansasonline.com/news/2019/oct/18/phaseout-ok-d-for-arkansas-dog-races-20/> (accessed February 7, 2022).

<sup>iii</sup> Li, David K., “Dog days of Florida come to an end, with total demise of U.S. greyhound racing within sight,” *NBC News*, December 31, 2020, <https://www.nbcnews.com/news/us-news/dog-days-florida-coming-end-total-demise-u-s-greyhound-n1252294> (accessed February 7, 2022).

<sup>iv</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 February 7, 2022).

<sup>v</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 February 7, 2022).

<sup>vi</sup> Lenard, Chelsea, “Overview of Dog Racing Laws,” *Animal Legal & Historical Center*, 2019, [https://www.animallaw.info/article/overview-dog-racing-laws#:~:text=By%20the%201990s%2C%20states%20began.%2C%20Advocacy%20for%20Animals%20\(Sept.](https://www.animallaw.info/article/overview-dog-racing-laws#:~:text=By%20the%201990s%2C%20states%20began.%2C%20Advocacy%20for%20Animals%20(Sept.) (accessed February 7, 2022).

<sup>vii</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 February 7, 2022).

<sup>viii</sup> Ebbert, Stephanie, “Mass. Voters approve dog racing ban,” *The Boston Globe*, November 4, 2008, <https://files.grey2kusa.org/pdf/11-05-08-BostonGlobe.pdf> (accessed November 15, 2017).

<sup>ix</sup> “Ducey signs bill ending Arizona’s live dog racing,” *Your West Valley*, May 13, 2016, [https://files.grey2kusa.org/pdf/2016.05.13\\_Your\\_West\\_Valley.pdf](https://files.grey2kusa.org/pdf/2016.05.13_Your_West_Valley.pdf) (accessed November 15, 2017).

<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 April 3, 2014).

<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-grey2k-usa-on-the-signing-of-house-bill-630-by-governor-john-lynch-and-the-end-of-greyhound-racing-98037069.html> (accessed November 15, 2017).

<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 February 7, 2022).

<sup>xiii</sup> Florida Department of Business and Professional Regulation, Division of Pari-Mutuel Wagering, Investigative Report for Case No. 2006029115 (Tallahassee, FL: July 20, 2006).

<sup>xiv</sup> GREY2K USA analysis of official injury reports provided by regulators from multiple states.

<sup>xv</sup> Theil, Carey, “Testimony on Senate Bills 76, 77 and 78,” *Oregon Legislature*, February 11, 2019, <https://olis.oregonlegislature.gov/liz/2019R1/Downloads/CommitteeMeetingDocument/158513> (accessed February 7, 2022).

- <sup>xvi</sup> Defede, Jim, "A Culture Of Cruelty': An Exclusive Look Inside The Secret World Of Greyhound Training," *CBS Miami*, July 26, 2020, <https://miami.cbslocal.com/2020/07/26/a-culture-of-cruelty-an-exclusive-look-inside-the-secret-world-of-greyhound-training/> (accessed July 28, 2020); Tabachnik, Sam, "Weld county greyhound 19 breeders under investigation for alleged animal cruelty," *Denver Post*, July 19, 2021, <https://www.denverpost.com/2021/07/19/greyhound-racing-lashmet-farm-live-lure-training/> (accessed October 11, 2021).
- <sup>xvii</sup> Linda L. Blythe et al., *Care of the Racing and Retired Greyhound*.
- <sup>xviii</sup> Florida Department of Business and Professional Regulation, Division of Pari-Mutuel Wagering v. Malcolm McAllister, Final Order, Case #: 2017005955, 2017007251, 2017007266, 2017007333, 2017007349, 2017007373, Florida, April 26, 2017; Florida Department of Business and Professional Regulation, Division of Pari-Mutuel Wagering v. Charles F. McClellan, Administrative Complaint, Case #: 2017004271, Florida, February 6, 2017; Florida Department of Business and Professional Regulation, Division of Pari-Mutuel Wagering v. Charles F. McClellan, Order of Emergency Suspension of License, Case #: 2017015413, 2017015397, 2017015390, 2017017907, 2017017896, 2017017835, 2017017938, 2017022299, 2017022306, 2017022320, 2017022331, 2017022547, 2017022552, 2017022577, 2017024143, 2017024147, 2017024154, Florida, June 9, 2017; Florida Department of Business and Professional Regulation, Division of Pari-Mutuel Wagering v. Natasha L. Nemeth, Order of Emergency Suspension of License, Case #: 2016053887, 2017025755, 2017027351, 2017027362, 2017027380, 2017036121, Florida, July 28, 2017.
- <sup>xix</sup> National Greyhound Association, as cited in; David Ono, "Guam Greyhounds get fresh start in L.A., KABC Channel 7 TV News, February 20, 2009, <http://abc7.com/archive/6670382/> (accessed December 1, 2017)
- <sup>xx</sup> "2021 North Dakota Toe and Service Providers, Simulcast Site Operators, and Live Track Licenses," *North Dakota Racing Commission*, [https://www.racingcommission.nd.gov/sites/www/files/documents/charities-providers/2021\\_licenses\\_january\\_2021.pdf](https://www.racingcommission.nd.gov/sites/www/files/documents/charities-providers/2021_licenses_january_2021.pdf) (accessed February 7, 2022).
- <sup>xxi</sup> "Oregon Racing Commission's Quarterly Multi-Jurisdictional Wagering Handle," *Oregon Racing Commission*, <https://www.oregon.gov/racing/Parimutuel%20Handle/MJ%20Hubs%20Stats/QT%20HND.pdf> (accessed February 7, 2022).
- <sup>xxii</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 Racing Commission. Secretary of State*, <https://secure.sos.state.or.us/oard/viewSingleRule.action?ruleVrsnRsn=133474>, accessed February 7, 2022).
- <sup>xxiii</sup> Paulick, Ray, "Which ADWs Have Gained The Most During COVID-19 Pandemic," *Paulick Report*, March 4, 2021, <https://paulickreport.com/news/the-biz/which-adws-have-gained-the-most-during-covid-19-pandemic/> (accessed February 7, 2022).
- <sup>xxiv</sup> Roughly \$500 million is being bet at the four remaining US dog tracks of Wheeling, Tristate, Southland, and Dubuque. We can account for about \$240 million of this \$500 million, which is being bet at former dog tracks, off track betting parlors, horse tracks, and casinos in various states. An additional \$50 million is being bet through the North Dakota Advance Deposit Wagering Hubs. This leaves approximately \$200 million in wagers processed through the Oregon hubs. As of 2021, *GREY2K USA Worldwide* is also tracking the daily handle reported by the two West Virginia dog tracks. This serves as an additional way to cross-reference and track greyhound racing handle reported to us by various states, as well as to pinpoint exactly how much dog betting is moving through Oregon.
- <sup>xxv</sup> "Advance Deposit Wagering Companies," *Oregon Racing Commission*, <https://www.oregon.gov/racing/Pages/Advance-Deposit-Wagering.aspx> (accessed February 7, 2022). Analysis done by *GREY2K USA Worldwide* shows each of these companies is processing greyhound bets from at least one of the United States, Australia, Ireland, Mexico, and the United Kingdom.
- <sup>xxvi</sup> "New SIS World Greyhound Tote Pool," *SIS*, <https://www.sis.tv/online-2/world-greyhound-tote-pool/> (accessed February 7, 2022).
- <sup>xxvii</sup> Ryan, Conor, "Thousands of greyhounds 'culled each year' for not being fast enough," *RTÉ*, June 26, 2019, <https://www.rte.ie/news/ireland/2019/06/26/1057535-greyhound-rte-investigates/> (accessed February 7, 2022).
- <sup>xxviii</sup> "Ban greyhound racing to end unnecessary deaths & suffering of racing dogs," *UK Government and Parliament*, <https://petition.parliament.uk/petitions/554073> (accessed February 7, 2022).
- <sup>xxix</sup> "Our Action Plan For Animal Welfare," *Department for Environment Food & Rural Affairs*, p. 16, [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/985332/Action\\_Plan\\_for\\_Animal\\_Welfare.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/985332/Action_Plan_for_Animal_Welfare.pdf) (accessed February 7, 2022).
- <sup>xxx</sup> Astill, Rebecca, "Political leaders throw their support behind Hope Rescue's campaign against greyhound racing," *Wales Online*, October 20, 2021, <https://www.walesonline.co.uk/news/wales-news/political-leaders-throw-support-behind-21915738> (accessed February 7, 2022).
- <sup>xxxi</sup> Gillies, Connor, "Fresh calls for end to greyhound racing in Scotland," *BBC*, June 18, 2019, <https://www.bbc.com/news/uk-scotland-48661853#:~:text=Greyhound%20racing%20is%20%22outdated%20and,the%20racing%20industry%20last%20year> (accessed February 7, 2022).
- <sup>xxxii</sup> Swarbrick, Chloe, "Chlöe Swarbrick: Greyhound racing is cruel, and we must end it now," *Stuff.co.nz*, April 25, 2021, <https://www.stuff.co.nz/opinion/300284720/chloe-swarbrick-greyhound-racing-is-cruel-and-we-must-end-it-now> (accessed February 7, 2022).
- <sup>xxxiii</sup> "Caliente," *TrackInfo*, <http://www.trackinfo.com/tracksinfo.jsp?raceid13=GCA%24&racedate=2021-02-10> (accessed February 10, 2021).
- <sup>xxxiv</sup> Bergman, Lowell, "Family Tree – The Hanks," *PBS Frontline*, 2010, <https://www.pbs.org/wgbh/pages/frontline/shows/mexico/family/bergman.html> (accessed February 10, 2021).
- <sup>xxxv</sup> FOIA response from Connie Woods Winn, *Oregon Racing Commission*, April 20, 2021.
- <sup>xxxvi</sup> OAR 462-220-0020.
- <sup>xxxvii</sup> Correspondence from Christine A. Dorchak, Esq. to Attorney General Ellen F. Rosenblum, September 24, 2021.
- <sup>xxxviii</sup> Correspondence from Kelly Cathey, Executive Director of the Oklahoma Horse Racing Commission to *GREY2K USA Worldwide*, May 4, 2021.