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In Memoriam

Kathy Pelton

Organization Listing is for Identification Purposes Only February 28, 2023

Honorable David Gomberg Oregon State House of Representatives 900 Court St. NE, H-480 Salem, Oregon 97301

Dear Representative Gomberg,

I am writing to respond to recent correspondence received by your office from the Oregon Racing Commission in which the ORC takes the contumacious and contrived position that it need not enforce new state law restricting online betting and wagering on dog racing, and by implication, may continue to ignore its own longstanding rule to the same effect.

Senate Bill 1504 was championed in the Senate by President Peter Courtney and signed into law by Governor Kate Brown on March 24, 2022. (Chapter 7, 2022 laws) In an effort to ensure interstate reciprocity, the bill contained language designed to prevent Oregon from processing bets from gamblers living in states where wagering on live dog racing is illegal. This was the will of the Legislature.

The final approved legislation restricts all gambling entities licensed and operating in Oregon from accepting bets on dog racing from individuals living in states where wagering on live dog racing is not legal. For practical purposes, this means that so-called Advanced Deposit Wagering (ADW) on dog races *via* the Oregon hub is only permissible if the bettor resides in one of ten states: Alabama, Arkansas, Connecticut, Iowa, Kansas, Oregon, Texas, West Virginia, Wisconsin, and arguably, part of Rhode Island. Florida is not one of these states. The official bill summary for Senate Bill 1504 confirms the reach of the statutory restriction:

"Persons whose residence is outside of Oregon can establish accounts in these Hubs to wager on greyhound racing if greyhound racing is lawful in that person's principal residence. OAR 462-220-0020(2). Nine states (including Oregon) plus certain towns in Rhode Island permit greyhound racing."¹

Section 1 of the legislation implements this understanding and was the product of knowing negotiations among all stakeholders. In relevant part, SB 1504 amended ORS 462.725 with the following new subsection:

"(7) A Multi-Jurisdictional Simulcasting and Interactive Wagering Totalizator Hub licensee may establish an account for wagering on greyhound racing for an individual unless wagering on live greyhound racing is unlawful in the jurisdiction of the individual's principal residence." But instead of enforcing the plain language of SB 1504, ORC Executive Director Connie Winn is now attempting to distract lawmakers with an unrelated issue. Specifically, she asserts that ADW bets from Florida residents are permissible and that such wagers may be processed by TwinSpires, and by extension, any other hub licensee, *because greyhound simulcast wagering is still legal in Florida*.

Obviously, simulcasting involves betting on remote races taking place elsewhere and is not the same thing as live racing. Therefore, it matters not that Florida still allows its residents to engage in *simulcast wagering*. The lynchpin of the Oregon law is *whether a state allows wagering on live dog racing*. To be clear, the Florida Constitution was amended and wagering on live greyhound racing was outlawed by the voters on November 6, 2018, effective January 1, 2021.² All operating tracks were shut down by a decisive vote of 69% - 31% statewide.³ The approved Constitutional Amendment read:

"After December 31, 2020 a person authorized to conduct gaming or pari-mutuel operations may not race greyhounds or any member of the Canis Familiaris subspecies in connection with any wager for money or any other thing of value in this state, and persons in this state may not wager money or any other thing of value on the outcome of a live dog race occurring in this state."⁴

To restate, the restrictions of SB 1504 spring from whether a state legally permits wagering on live dog racing, and does not reference simulcast wagering at all. But in her undated letter to you, Ms. Winn attempts to equate and conflate the activities. She writes as follows:

"[T]he Florida Constitution does not make wagering by Floridians on the outcome of a live dog race taking place outside Florida illegal. It also does not make the acceptance of wagers from Floridians on dog races taking place outside Florida illegal. Indeed this is an example of the scenario that USBETS, in its March 3, 2022 article quoted former Executive Director McGrail as attempting to explain – that while some states have made live greyhound racing illegal within their own state they have not, in addition, made wagering on live greyhound racing (or other dog racing) elsewhere illegal for their residents." (emphasis added)

Ms. Winn's statement that simulcast wagering is still legal in Florida is irrelevant to the application of the new Oregon law. Her assertion also runs contrary to the Commission's own longtime rules, which she was charged with understanding and enforcing during her 2014-2022 tenure as Supervisor of Account Wagering Hubs. As a threshold matter, OAR 462-110-0010 defines simulcasting as follows:

"(a) Live audiovisual electronic signals emanating from a licensed race meeting and transmitted simultaneously with the running events at that meeting, and includes the transmission of pari-mutuel wagering odds, amounts wagered and payoff on such events, and other racing programming relating to the race animals or participants, or (b) Such other form of electronic signals of animal racing as is approved by the commission."⁵

Then OAR 462-220-0020, which has been in effect since May 1, 2000, specifically restricts the use of the Oregon hub for greyhound racing to persons in states where wagering on live racing is legal. Ironically, it was Ms. Winn's resistance to enforcing this longstanding regulation which prompted the passage of nearly identical language under SB 1504.

Even more than mere resistance to implementing rules and statutes, however, Ms. Winn's correspondence contains a material misrepresentation. In her undated letter to you, she claims to have received confirmation of her position from the Florida Gaming Control Commission. However, the actual communications between Ms. Winn, Senior Assistant Attorney General Catriona McCracken and Florida Gaming Control Director Joe Dillmore, do not bear this out. These are attached for your review.

The question Ms. McCracken submitted to Florida regulators on behalf of Ms. Winn was leading and clearly written to elicit a facially supportive response. She asked if remote gambling by Floridians (simulcast wagering) on greyhound racing is legal:

"We write to inquire whether, in the view of the Florida Gaming and Control Commission, the Florida Constitution and Florida statutes permit TwinSpires to accept wagers placed by people within Florida on live commercial greyhound races taking place outside Florida."

Obviously, the question at hand is *whether wagering on live greyhound racing is legal in Florida*. So the response the ORC received did not in any way "confirm" an interpretation favorable to the ORC's non-enforcement decision. In reality, Director Dillmore clarified that his agency could offer no opinion as to whether it is legally permissible for TwinSpires to accept ADW bets from Florida residents.

"We appreciated the opportunity to speak with the Oregon Racing Commission. Having read your message, however, we want to reiterate and clarify the following: while it is true the Florida Constitution does not bar Florida residents from placing wagers on greyhound races taking place outside of Florida, such wagers would only be legal in Florida if all other applicable requirements were met. *See, e.g.,* §§ 550.155(1); 849.142, Fla. Stat. If those requirements were not met, then the wager would constitute a felony offense. *See* § 849.14, Fla. Stat. As far as advanced deposit wagering (or "ADW") is concerned, the Commission cannot opine about the legality of any specific company's ADW offerings without first having a thorough and detailed understanding of the individual ADW operation. But, again, unless such ADW activity meets all applicable requirements, the activity would be a felony offense in Florida. *See* id. Accordingly, because it lacks the required understanding of any specific Oregon licensed ADW platform which may offer its wagering platform to Florida residents, **the Commission is unable to draw any conclusion regarding the legality of such a platform.**" (emphasis added)

Note that Mr. Dillmore did not use the word "live" in his response, despite attempts by Ms. Winn and Ms. McCracken to push him in this direction.

It is also helpful to note that there are repeated references in the Oregon racing statutes and administrative rules to live racing and separately, to simulcasting, distinguishing the two throughout. For example, ORS 462.145 states that handicapping contests may occur on "live races conducted at the licensee's race course <u>or</u> simulcast races offered by the licensee." (emphasis added)

Similarly, Florida law also distinguishes live racing versus simulcasting. Wagering on live greyhound racing is prohibited by the Florida Constitution, while simulcast wagering on greyhound races from other jurisdictions is not. In fact, before the passage of Amendment 13 in 2018, Florida required all licensed dog tracks to hold a "full schedule of live racing" in order to also offer simulcast wagering. This mandate, which still applies to other forms of pari-muutel racing, may be found at Florida Statutes 550.002(11) and dictates that a mandatory minimum of live races be held each year for jai alai, harness and quarter horse racing.

"Full schedule of live racing or games" means, for a jai alai permitholder, the conduct of a combination of at least 100 live evening or matinee performances during the preceding year; for a permitholder who has a converted permit or filed an application on or before June 1, 1990, for a converted permit, the conduct of a combination of at least 100 live evening and matinee wagering performances during either of the 2 preceding years; for a jai alai permitholder who does not operate slot machines in its pari-mutuel facility, who has conducted at least 100 live performances per year for at least 10 years after December 31, 1992, and whose handle on live jai alai games conducted at its pari-mutuel facility has been less than \$4 million per state fiscal year for at least 2 consecutive years after June 30, 1992, the conduct of a combination of at least 40 live evening or matinee performances during the preceding year; for a jai alai permitholder who operates slot machines in its pari-mutuel facility has been less than \$4 million per state fiscal year for at least 2 consecutive years after June 30, 1992, the conduct of a combination of at least 40 live evening or matinee performances during the preceding year; for a jai alai permitholder who operates slot machines in its pari-mutuel

facility, the conduct of a combination of at least 150 performances during the preceding year; for a harness permitholder, the conduct of at least 100 live regular wagering performances during the preceding year; for a quarter horse permitholder at its facility unless an alternative schedule of at least 20 live regular wagering performances is agreed upon by the permitholder and either the Florida Quarter Horse Racing Association or the horsemen's association representing the majority of the quarter horse owners and trainers at the facility and filed with the division along with its annual date application, in the 2010-2011 fiscal year, the conduct of at least 20 regular wagering performances, in the 2011-2012 and 2012-2013 fiscal years, the conduct of at least 30 live regular wagering performances, and for every fiscal year after the 2012-2013 fiscal year, the conduct of at least 40 live regular wagering performances; for a quarter horse permitholder leasing another licensed racetrack, the conduct of 160 events at the leased facility; and for a thoroughbred permitholder, the conduct of at least 40 live regular wagering performances during the preceding year. For a permitholder which is restricted by statute to certain operating periods within the year when other members of its same class of permit are authorized to operate throughout the year, the specified number of live performances which constitute a full schedule of live racing or games shall be adjusted pro rata in accordance with the relationship between its authorized operating period and the full calendar year and the resulting specified number of live performances shall constitute the full schedule of live games for such permitholder and all other permitholders of the same class within 100 air miles of such permitholder. A live performance must consist of no fewer than eight races or games conducted live for each of a minimum of three performances each week at the permitholder's licensed facility under a single admission charge." (emphasis added)

Therefore, when a Floridian legally places a bet on an out-of-state dog race *via* simulcasting, this is legally distinct from placing a "wager on a live greyhound race." It cannot be, because it does not occur at the permitholder's licensed facility in Florida. Finally, yet another distinction is found in the definition of a "Host Track" under Florida Statutes 550.002(16):

"Host track" means a track or fronton conducting <u>a live or simulcast race</u> or game that is the subject of an intertrack wager." (emphasis added)

In closing, it's worth noting that during negotiations for Senate Bill 1504, Hub Supervisor Winn sent an email to then-Executive Director Jack McGrail advising him that internet gambling companies had "concerns with the word live." The Commission then attempted to remove this word from the legislation, but Senate President Courtney specifically retained it so that the distinction between live racing and simulcasting would be maintained. It is unclear whether Ms. Winn has forgotten these negotiations or is simply choosing to ignore them at this time. Her extraordinary decision to continue resisting the will of the Legislature should not be rewarded with further delay.

I hope this information is helpful. We are grateful for your leadership on this important issue.

Sincerely, A. DochaR

Christine A. Dorchak, Esq. President and General Counsel

¹ Whitney Perez, LPRO Analyst, HB 1504 Staff Measure Summary,

https://olis.oregonlegislature.gov/liz/2022R1/Downloads/CommitteeMeetingDocument/252776 (accessed February 27, 2023)

² Florida Division of Elections, https://dos.elections.myflorida.com/initiatives/initdetail.asp?account=11&seqnum=27 (accessed February 27, 2023).

³ Jack Anderson, *LawInSport*, December 14, 2018

https://files.grey2kusa.org/pdf/LawInSport-The-legal-status-and-difficult-futureof-greyhound-racing.pdf (accessed February 27, 2023).

⁴ Ibid at 1.

Oregon Secretary of State, Oregon Racing Commission, Division Rules, 462-220-0020, Account Wagering Rules Apply, MULTI-JURISDICTIONAL SIMULCASTING AND INTERACTIVE WAGERING TOTALIZATOR HUB, https://secure.sos.state.or.us/oard/displayDivisionRules.action?selectedDivision=2329 (accessed February 27, 2023.

Page 1

From:	"Dillmore, Joe"
To:	<u>"Marshman-FGCC, Ross" <ross.marshman@fgcc.fl.gov></ross.marshman@fgcc.fl.gov></u>
Date:	12/21/2022 9:17:30 AM
Subject:	FW: Question from the Oregon Racing Commission and the Oregon Department of Justice
Attachments:	Letter to Director Dillmore Florida Gaming Control Commission 12.15.22.pdf
Subject:	FW: Question from the Oregon Racing Commission and the Oregon Department of Justice

Please see the email below and attached letter from the Oregon Racing Commission and the Oregon Department of Justice.

From: McCracken Catriona [mailto:catriona.mccracken@doj.state.or.us]
Sent: Thursday, December 15, 2022 6:06 PM
To: Dillmore, Joe <Joe.Dillmore@fgcc.fl.gov>
Cc: Davis Kelsey <kelsey.davis@doj.state.or.us>; McCracken Catriona <catriona.mccracken@doj.state.or.us>
Subject: RE: Question from the Oregon Racing Commission and the Oregon Department of Justice

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Mr. Dillmore:

I am resending this morning's email and attachment due to the macro failure discovered when printing to file – our apologies.

Attached again, please find the corrected letter detailing the question posed to you on behalf of the Oregon Racing Commission.

Thank you, once again, for your attention to this matter.

Regards,

Catriona

G. Catriona McCracken (Pronouns she/her/hers)

Sr. Assistant Attorney General | Business Activities Section | General Counsel Division
Oregon Department of Justice
1162 Court St., Salem OR 97301
971.707.3161
Catriona.mccracken@doi.state.or.us





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From: McCracken Catriona <<u>catriona.mccracken@doj.state.or.us</u> >
Sent: Thursday, December 15, 2022 9:43 AM
To: 'joe.dillmore@fgcc.fl.gov' <<u>joe.dillmore@fgcc.fl.gov</u> >
Cc: McCracken Catriona <<u>catriona.mccracken@doj.state.or.us</u> >; Davis Kelsey <<u>kelsey.davis@doj.state.or.us</u> =
Subject: Question from the Oregon Racing Commission and the Oregon Department of Justice

Dear Mr. Dillmore:

Attached please find a letter detailing a question posed to you on behalf of the Oregon Racing Commission.

Thank you for your attention to this matter.

Regards,

Catriona

G. Catriona McCracken (Pronouns she/her/hers)

Sr. Assistant Attorney General | Business Activities Section | General Counsel Division Oregon Department of Justice 1162 Court St., Salem OR 97301 971.707.3161 Catriona.mccracken@doj.state.or.us



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DEPARTMENT OF JUSTICE GENERAL COUNSEL DIVISION

December 14, 2022

SENT VIA EMAIL: joe.dillmore@fgcc.fl.gov

Joe Dillmore Director Florida Gaming Control Commission 2601 Blair Stone Road Tallahassee, FL 32399-1035

RE: Question re acceptance of wagers on live commercial greyhound racing DOJ File No.: 862001-GB0094-22

Dear Mr. Dillmore:

My name is Catriona McCracken. I am a Senior Assistant Attorney General with the Oregon Attorney General's Office. I represent the Oregon Racing Commission (ORC) and I am writing with a question on behalf of its director.

The Oregon Racing Commission has received an inquiry from an Oregon legislator regarding the acceptance of on-line wagers by TwinSpires placed by people within Florida on live commercial greyhound races taking place outside Florida.

The Florida Constitution provides:

"a person authorized to conduct gaming or pari-mutuel operations may not race greyhounds or any member of the Canis Familiaris subspecies in connection with any wager for money or any other thing of value in this state, and persons in this state may not wager money or any other thing of value on the outcome of a live dog race occurring in this state." Florida Constitution Article X, §32.

Article X, §32 further proscribes: "activities that aid or abet violations of this section." The Florida Supreme Court analyzed this language in *Dep't of State v. Fla. Greyhound Ass'n, Inc.*, 253 So. 3d 513, 520-525 (Fla. 2018).

We write to inquire whether, in the view of the Florida Gaming and Control Commission, the Florida Constitution and Florida statutes permit TwinSpires to accept wagers placed by

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Telephone: Error! Unknown document property name. Fax: Error! Unknown document property name. TTY: Error! Unknown document property name. www.doj.state.or.us

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December 15, 2022 Page 2

people within Florida on live commercial greyhound races taking place outside Florida. We would very much appreciate your response.

Thank you.

Sincerely,

/s/ Catriona McCracken

Catriona McCracken Senior Assistant Attorney General Business Activities Section, General Counsel Division Oregon Attorney General's Office catriona.mccracken@doj.state.or.us

CM/kd5/661224745

Page 1

From:	"Dillmore, Joe"
To:	<u>"Trombetta-FGCC, Louis" <louis.trombetta@fgcc.fl.gov></louis.trombetta@fgcc.fl.gov></u>
Date:	1/25/2023 9:46:30 AM
Subject:	FW: Question from the Oregon Racing Commission and the Oregon Department of Justice
Attachments:	Dillmore Itr 12.15.2022 - Final.pdf

From: McCracken Catriona [mailto:catriona.mccracken@doj.state.or.us]

Sent: Tuesday, January 24, 2023 2:12 PM

To: Dillmore, Joe <Joe.Dillmore@fgcc.fl.gov>

Cc: Davis Kelsey <kelsey.davis@doj.state.or.us>; McCracken Catriona <catriona.mccracken@doj.state.or.us>; Martin Kyle J <kyle.j.martin@doj.state.or.us>

Subject: RE: Question from the Oregon Racing Commission and the Oregon Department of Justice

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Good morning (my time but afternoon yours) Director Dillmore:

I hope you too had a pleasant seasonal break and a very Happy New Year!

I am writing to remind you of the Oregon Racing Commission's (ORC's) December 15, 2022, emailed letter inquiry as to whether, in the view of the Florida Gaming and Control Commission, the Florida Constitution and Florida statutes permit TwinSpires to accept wagers placed by people within Florida on live commercial greyhound races taking place outside Florida.

As I'm sure you can understand, the ORC's Executive Director Connie Winn is eager to be able to respond to the Oregon legislator whose letter prompted the above question. Oregon DOJ and ORC, therefore, very much look forward to receipt of your response to this question.

Thank you again for your assistance with this matter.

Regards,

Catriona

G. Catriona McCracken (Pronouns she/her/hers) Sr. Assistant Attorney General | Business Activities Section | General Counsel Division Oregon Department of Justice 1162 Court St., Salem OR 97301 971.707.3161 Catriona.mccracken@doj.state.or.us







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From:	Dillmore, Joe
Sent:	Fri, 3 Feb 2023 14:45:34 -0500
То:	Connie.WINN@orc.oregon.gov
Cc:	Marshman-FGCC, Ross;Trombetta-FGCC, Louis;Karen.Parkman@orc.oregon.gov
Subject:	RE: Recap of our meeting today.

Good Afternoon Ms. Winn,

We appreciated the opportunity to speak with the Oregon Racing Commission. Having read your message, however, we want to reiterate and clarify the following: while it is true the Florida Constitution does not bar Florida residents from placing wagers on greyhound races taking place outside of Florida, such wagers would only be legal in Florida if all other applicable requirements were met. *See*, *e.g.*, §§ 550.155(1); 849.142, Fla. Stat. If those requirements were not met, then the wager would constitute a felony offense. *See* § 849.14, Fla. Stat. As far as advanced deposit wagering (or "ADW") is concerned, the Commission cannot opine about the legality of any specific company's ADW offerings without first having a thorough and detailed understanding of the individual ADW operation. But, again, unless such ADW activity meets all applicable requirements, the activity would be a felony offense in Florida. *See* id. Accordingly, because it lacks the required understanding of any specific Oregon licensed ADW platform which may offer its wagering platform to Florida residents, the Commission is unable to draw any conclusion regarding the legality of such a platform.

Best regards,



Joe Dillmore Director Florida Gaming Control Commission Division of Pari-Mutuel Wagering Office of the Director Office 850-488-9130

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The State of Florida has a very broad public records law pursuant to Chapter 119, Florida Statutes. Most written communications to and from state officials regarding state business are public records, available to the public and media upon request. Therefore, your e-mail communications may be subject to public disclosure. LARGER VIEW

From: WINN Connie * ORC [mailto:Connie.WINN@orc.oregon.gov]
Sent: Tuesday, January 31, 2023 7:39 PM
To: Marshman-FGCC, Ross <Ross.Marshman@fgcc.fl.gov>; Dillmore, Joe <Joe.Dillmore@fgcc.fl.gov>; Trombetta-FGCC, Louis <Louis.Trombetta@fgcc.fl.gov>
Cc: WINN Connie * ORC <Connie.WINN@orc.oregon.gov>; PARKMAN Karen * ORC

<Karen.Parkman@orc.oregon.gov> **Subject:** Recap of our meeting today.

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Mr. Dillmore and Attorney Marshman:

Thank you very much for taking the time to speak with the Oregon Racing Commission (ORC) and its assigned counsel (AAG Catriona McCracken) today. It was a pleasure to speak with both of you. As discussed, the Oregon Racing Commission's (ORC's) purpose in meeting with you was to ascertain whether the State of Florida, through its Florida Gaming and Control Commission (FGCC), interprets Florida's Constitution to permit Floridians to wager on greyhound races taking place outside of the State of Florida in other states and countries.

From our discussion of this morning, it is our understanding that the FGCC <u>does</u> interpret the Florida Constitution to permit Floridians to wager on greyhound races taking place outside of the State of Florida. Moreover, the FGCC continues to license greyhound racing businesses in Florida (which continue to run card rooms etc.) that provide multijurisdictional simulcast feed from states and countries outside of Florida, feed which includes greyhound races taking place in states and countries other than Florida, for the purpose of permitting Floridians to wager on greyhound races. As such, the FGCC considers acceptance by ADWs of wagers placed by Floridians on greyhound races taking place outside the State of Florida to be legal under Florida law.

We note for clarity, that our discussion did not focus on the details of any one Oregon licensed ADW that is currently offering out of state greyhound race wagering to wagerers in Florida. This was because the FGCC had not in the past had reason to look into an Oregon licensed ADW that was accepting such wagers, and was also because the FGCC has, to its knowledge, no reason to look into any Oregon licensed ADW at this time.

Thank you again for taking the time to speak with us today.

Respectfully,

Connie "Pepper" Winn

Connie "Pepper" Winn Executive Director Oregon Racing Commission PO Box 366 Gresham OR 97030

The Oregon Racing Commission would like to hear from all stakeholders. Please consider taking our short survey:

Oregon Racing Commission Survey

If you or someone you know has a gambling problem and wants help, call 1-800 GAMBLER.

WINN Connie * ORC

From: Sent: To: Subject: WINN Connie * ORC Friday, February 11, 2022 3:30 PM Lorilee Goodall FW: YOUR LEGISLATIVE COUNSEL REQUEST - SB1504.1

Respectfully,

Connie "Pepper" Winn

Connie "Pepper" Winn Supervisor – Account Wagering Hubs Oregon Racing Commission

From: WINN Connie * ORC Sent: Friday, February 11, 2022 3:29 PM To: MCGRAIL Jack * ORC <Jack.McGrail@orc.oregon.gov> Subject: RE: YOUR LEGISLATIVE COUNSEL REQUEST - SB1504.1

There are concerns about the word live also.

Respectfully,

Connie "Pepper" Winn

Connie "Pepper" Winn Supervisor – Account Wagering Hubs Oregon Racing Commission

From: MCGRAIL Jack * ORC <<u>Jack.McGrail@orc.oregon.gov</u>> Sent: Friday, February 11, 2022 3:18 PM To: RHOADES Jeffrey * GOV <<u>Jeffrey.RHOADES@oregon.gov</u>> Cc: WINN Connie * ORC <<u>Connie.WINN@orc.oregon.gov</u>> Subject: FW: YOUR LEGISLATIVE COUNSEL REQUEST - SB1504.1

Jeff:

Connie needs to check with licensees and is copied here. I'm thinking they would be ok with the below. We will try to track them down. I am out for remainder of the day. Jack

"(7) A Multi-Jurisdictional Simulcasting and Interactive Wagering Totalizator Hub licensee may **not** establish an account for wagering on greyhound racing for an individual whose principal residence is **in, or** outside the State of Oregon-unless

wagering on live greyhound racing is <u>un</u>lawful in the jurisdiction of the individual's principal residence.

From: RHOADES Jeffrey * GOV <<u>Jeffrey.RHOADES@oregon.gov</u>> Sent: Friday, February 11, 2022 2:55 PM To: MCGRAIL Jack * ORC <<u>Jack.McGrail@orc.oregon.gov</u>> Subject: Fwd: YOUR LEGISLATIVE COUNSEL REQUEST - SB1504.1

Jack:

Would love your thoughts here.

Jeff

Jeff Rhoades

Governor's Policy Advisor | Office of Oregon Governor Kate Brown COVID-19 Response: Administrative Rules | Enforcement Coordination Policy Areas: OLCC | Gaming | Opioid Epidemic

Begin forwarded message:

From: BAKER Jennifer * GOV <<u>Jennifer.BAKER@oregon.gov</u>> Date: February 11, 2022 at 1:34:44 PM PST To: RHOADES Jeffrey * GOV <<u>Jeffrey.RHOADES@oregon.gov</u>> Subject: Fwd: YOUR LEGISLATIVE COUNSEL REQUEST - SB1504.1

Does this address it?

Jenn Baker(she/her) Legislative Director and Labor Policy Advisor Office of Governor Kate Brown phone: <u>971.239.7080</u>

Begin forwarded message:

From: Sangston Derek <<u>Derek.Sangston@oregonlegislature.gov</u>> Date: February 11, 2022 at 1:23:46 PM PST To: BAKER Jennifer * GOV <<u>Jennifer.BAKER@state.or.us</u>> Subject: FW: YOUR LEGISLATIVE COUNSEL REQUEST - SB1504.1

From: Sen Courtney <<u>Sen.PeterCourtney@oregonlegislature.gov</u>> Sent: Friday, February 11, 2022 8:53 AM To: Taylor Lisa <<u>Lisa.Taylor@oregonlegislature.gov</u>>; Sangston Derek

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