



**Coalition Against Gambling in New York** 310 Woodward Avenue, Buffalo NY 14214

The Hon. John J. LaFalce  
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To the New York State Gaming Commission

Jan 21, 2014

Now that the Upstate Gaming Act of 2013 rules, our non-profit coalition turns to you with two recommendations for action. This letter describes the first, for a statewide assessment of gambling behaviors. A second letter treats the other, to raise the minimum age for gambling.

We request that the Commission ask the legislature to authorize funding for a comprehensive epidemiological study of gambling behaviors in NYS. This must profile “disordered gambling,” as DSM-V calls what used to be “pathological” gambling. It must also characterize the “at risk” sector previously called “problem” (or Level II) gambling. These two types of gambling behavior together affect 3- 4% of adults. There should be a follow-up study.

The upstate Gaming Act of 2013 prescribed funding for “treatment” and “prevention.” The adequacy of that funding and the efficacy of how it is handled cannot be assessed without knowing the scope of the problem it is meant to remedy. Assembly bill A [7836](#) (2013, Cymbrowitz sponsor) proposed laudably to study the extent of “legal and illegal gambling” in NYS. This ought to be re-drafted to attend more to epidemiology of disordered and “at-risk” gambling over time.

I would be honored to meet with the Commission or with legislators like AM Cymbrowitz concerned with treatment and prevention to talk more about such a study. Funding should not be taken from the small allocation for treatment and prevention in the Gaming Act, but from a new source. Lottery, we note, budgets via racinos millions of dollars for horses and racing but nothing for treatment and prevention. A \$500 annual fee per VLT for each of the 2000 VLTs to be installed downstate would yield a million dollars per year, a good start on study funding.

Sincerely,

Stephen Q. Shafer MD MA MPH

cc Member of Assembly Steven Cymbrowitz



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Jan 21, 2014

This is the second of our two requests submitted today. The first relates to an epidemiological study of gambling in New York State. This second one recommends that the minimum age for gambling in licensed premises be set at twenty-one. This is already in motion with [S 3417](#), introduced by Sen. Addabo and co-sponsored by Sen. Krueger. We commend the sponsors.

The Upstate Gaming Act set the minimum age for gambling at the new casinos in NYS as the same age for alcohol purchase, twenty-one. This is prudent. As you are aware, however, the minimum age at which a person can wager on a gambling floor is only eighteen at some racinos in New York State. S3417 would close the racino loophole, a good step. We believe, however, that the bill should be rewritten to cover also other “games” than video lottery terminals and other settings than casinos, racinos and slot parlors; specifically it should cover Quick-Draw in all settings without or with alcohol served.

That the minimum age is eighteen at Turning Stone and at the Akwesasne Casino is reprehensible, but outside direct state control. If the State holds to age twenty-one at all facilities it can regulate, the Indian casinos could not defend themselves for preying on 18-20 year olds by saying “the racinos do it too.”

The sponsors of this bill I am sure would appreciate the Gaming Commission’s advising the Racing, Gaming and Wagering Committee that the Commission supports this bill, with a necessary revision to cover locales outside casinos, racinos and VLT parlors.

Sincerely,

Stephen Q. Shafer MD MA MPH

cc State Senator Joseph Addabo; State Senator Liz Krueger