



Madison Brame

From: Les Bernal <les@stoppredatorygambling.org>
Sent: Tuesday, November 19, 2024 9:32 AM
To: GB, PGCB Regulations
Subject: [External] Regulation #125-250

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November 19, 2024
 Mr. Robert Wood
 Assistant Chief Counsel
 Pennsylvania Gambling Control Board
 303 Walnut Street, 5th Floor, Harrisburg, PA 17101

Re: Public Comment from Les Bernal, National Director Of Stop Predatory Gambling on Proposed Regulation #125-250

Dear Mr. Wood:

I am writing on behalf of Stop Predatory Gambling, a national advocacy organization with members in all 50 states whose mission is to reveal the truth behind gambling operators to advocate for citizens and communities who have suffered harm, to prevent more victims, and to champion policy reforms that stop predatory gambling.

The purpose of this letter is to strongly urge the PGCB to maintain the requirement that people who are seeking to remove their names from the state's casino self-exclusion list must make an affirmative request to do so. This requirement intentionally adds friction to the process of taking one's name off the self-exclusion list, and it serves the important function of protecting recovering gambling addicts from being targeted by the state's casino operators.

A recent [UMASS-Amherst report](#) prepared for the Massachusetts Gambling Commission found that **the percentage of casino revenues extracted from gambling-addicted citizens and those at-risk for addiction was 90%! The business model for regional casinos is based upon addiction.**

Self-exclusion is the *ONLY* option available for the hundreds of thousands of gambling-addicted citizens in Pennsylvania to protect themselves from the predatory and manipulative business practices of the state's casinos. This life-changing addiction causes the kind of human misery like very few things can including significant [increases](#) in rates of personal bankruptcy, divorce, and domestic violence. It's why gambling addiction has the highest rate of suicide of any addiction.

Who are the primary beneficiaries if this self-exclusion safeguard is removed? One is the state's casinos who will instantly unleash their marketing teams to target these former self-excluded gamblers and the big profits they represent. The other is PGCB's administrative staff, the public employees who endure the mentally and physically exhausting work of serving as the people's watchdog over "America's most-regulated industry." If not for the work of state gambling commissions like the PGCB, the percentage

of casino revenues extracted from gambling-addicted citizens and those at-risk for addiction would likely be even higher than 90%.

The maintenance of this self-exclusion protection for recovering gambling addicts is part of the PGCB's duty to protect Pennsylvania's citizens from being harmed by the state's commercialized gambling operators. We strongly urge the PGCB to **abandon** this proposed change and continue to require that those wishing to remove their names from the state's casino self-exclusion list make an affirmative request to do so.

I invite you to please contact me if I can be helpful to you in any way on this matter or any other issue relating to predatory gambling. You can reach me at (202) 567-6996 x1 or mail@stoppredatorygambling.org.

When you have a moment, please send a confirmation that you received this submission. Thank you.

Sincerely,
Les Bernal, National Director
Stop Predatory Gambling

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Stop Predatory Gambling
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