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RESEARCH IN BRIEF

Regulation of the Gaming Industry Across Time and Place

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Gambling has proliferated in America since the late 1970s,when only two U.S. jurisdictions had legalized casino gaming and only a few states had lotteries. Today, 48 of the 50 states have legalized gaming in some form; only Hawaii and Utah continue to completely prohibit it. Furthermore, in addition to casinos and lotteries, there are many new forms of gambling available (e.g., esports, electronic games such as keno or slots, online poker) that continue to challenge those responsible for ensuring gambling helps the public more than it harms the public. Yet, very little research exists that illuminates how regulatory agencies respond to violations by gaming licensees.

In this brief, I examine how the state and its agents manage balancing the social benefits and social costs associated with gaming legalization. Specifically, the current research uses the gambling industries in Las Vegas, NV and Atlantic City, NJ and explores how gaming regulators help legitimize the industry (to reap the economic benefits of consumption) while also ensuring that consumers and their citizens are protected. I begin with an overview of the costs/benefits involved with gambling legalization as well as the industry characteristics of Las Vegas and Atlantic City. I then explain the methods used to examine regulatory responses to violations by gaming licensees in both jurisdictions, followed by the results of the research study. The research brief concludes with a discussion of the broader implications of the research for regulatory agencies, other stakeholders, and other researchers interested in the study of gambling regulation.

HIGHLIGHTS

- Gaming regulators are responsible for contradictory goals—protecting consumers while supporting revenue generation from the gaming industry. This Research In Brief examines how regulators handle such contradictions and whether the preferred strategy differed by jurisdiction. Specifically, this document discusses how regulators respond to gaming licensee violations in Las Vegas and Atlantic City.
- The research involved a review of archival data and a content analysis of complaints/dispositions files available from the Nevada Gaming Control Board website as well as from the New Jersey Division of Gaming Enforcement website.
- Differences in the regulatory strategies of the two cities include: the types of behaviors cited, who specifically was listed in the complaint, the number of behaviors specified in the complaints, and the types of sanctions used against noncompliant licensees.
- These results demonstrate that, despite Las Vegas and Atlantic City gaming regulators navigating similar contradictions, explicit regulatory priorities and implicit social/political pressures resulted in very different regulatory strategies when addressing noncompliance by gaming licensees.
- Policy implications are discussed, including the need for regulators to involve the public, policymakers, and the industry when deciding how to effectively protect consumers and further legitimize the industry.

Background

The legalization of any vice behavior brings with it a complication—as governments move from pure prohibition (which entails a law enforcement response in the case of criminal behavior) to a more complex “cautious tolerance,” social norms and boundaries surrounding the particular behavior must be redefined (Cosgrave and Klassen, 2001; Skolnick and Dombrink, 1978). The State, in its role as the legalizer and legitimizer of the behavior, generally has conflicts of interest when acting in that role. The State needs the vice industry to succeed and provide the government with revenue, but the State also has to constrain the industry so it does not hurt consumers. In turn, the industry needs the State to help make it more desirable for consumers to participate (Chambliss, 1993; Spapens, 2012).

States legalize gambling primarily to earn money from gambling revenues (which can then be used to fund socially-beneficial programs such as education or infrastructure projects). States also legalize gambling to indirectly benefit from increased tourism (e.g., casino-resorts) and employment opportunities. Despite these benefits, legalized gambling is also associated with increased crime rates, as well as with individual-level stressors such as financial problems, suicidality, and marital problems (Bogart, 2010; Cosgrave and Klassen 2001; de Graaf et al., 2011; Walker and Calcagno, 2013).

Although much prior research has examined the State’s control over the industry in terms of licensing/market entry (see Homeyer, 2011; Sayre, 1994; Skolnick, 1978), policymaking (see Bogart, 2010; McGinley, 2012), and duty of care considerations for problem gambling (see Antolak-Saper, 2010; Bauer, 2006; Sasso and Kalajdzic, 2006; Slavina, 2010), little research has collected empirical data to study the role of regulators—as agents of the State—in navigating these conflicts. The last empirical study on US gaming regulators was conducted by Jerome Skolnick in 1978 (see also Skolnick and Dombrink, 1978)—his book House of Cards described an in-depth case study on the Nevada Gaming Control Board and their interactions in industry players. Of course, the industry has changed tremendously since then. The time has come for a new look into gaming regulators and their unique, uncertain roles in promoting inconsistent state interests.

The Present Study – Research Questions

Motivated by the lack of research on how the gaming industry is regulated, the current paper examines how gaming regulators in two cities (Las Vegas and Atlantic City) have handled the legitimization process. I take a comparative approach to examine how structural contradictions differ across time and place, even within one industry. The paper begins with a literature review comparing Las Vegas and Atlantic City’s regulatory approaches—how their respective strategies are guided by unique purposes for legalization and how the different regulatory strategies impact the industry in those locales. I then examine data coded from official regulatory agency documents in both cities to compare regulatory responses in practice.

History of Gaming in Las Vegas and Atlantic City

Las Vegas has a long history of tolerating gambling before formal regulations and laws were put into place (Prum and Bybee, 1999; Skolnick, 1978). In contrast, Atlantic City took a prohibitory approach both formally and informally. Gambling was formally legalized in Las Vegas in 1931; the desert city, which is land-locked, was unable to increase their population or promote other sorts of industries that would provide revenue for their government and citizens. There was also consensus that the prohibition of gambling was ineffective (Cabot et al., 2016; O’Reiley, 2011; Prum and Bybee, 1999). Therefore, the legalization of gaming served as a critical source of income for the city as a whole—it was not simply filling in gaps or serving as supplemental financing. In New Jersey, however, the decision to legalize gaming was motivated by a very narrow purpose: to revitalize Atlantic City and provide economic support that would benefit elderly and disabled populations in the state. Policymakers and the public were highly resistant to the gambling industry and attempted to limit the reach of the industry as much as possible. For instance, policymakers ensured that there would be a limited number of casinos confined to one small location (Becker, 2007; Cabot et al., 2016; Hicks, 1980; Morse and Goss, 2007; Prum and Bybee, 1999; Stansfield, 1978).

Over the past 30 years, the gaming industry in Las Vegas has done well—from 1984 to 2016, gaming revenues have increased each year with the exceptionof the Great Recession era (2008 – 2010) and in 2014. Since the Great Recession, Las Vegas has experienced an economic recovery; this recovery has been attributed to the city’s expansion into non-gaming activities (e.g., high-end restaurants, nightclubs, theater shows and concerts; Cabot et al., 2016; Eadington, 2011; Flanegan et al., 2014; Hicks, 1980; Morse and Goss, 2007; Schwartz, 2017a).

At the same time, Atlantic City's casino industry has been somewhat stagnant since the economic downturn of the 1980s, and began seeing declining revenues beginning in 2007—since 2006, revenue in Atlantic City has been reduced by over 50% (Schwartz, 2017b; see also Flanagan et al., 2014). Atlantic City casinos are likely to continue to struggle, especially in the face of increased East Coast competition as other jurisdictions legalize gambling (Cabot et al., 2016; Eadington, 2011; Hicks, 1980). It has been argued that Atlantic City has not done enough to diversify its industry beyond gambling as Las Vegas has, though the legalization of internet gambling has shown some promise in revenue generation (Cabot et al., 2016; Hicks, 1980; Parry, 2017).

Regulatory Missions and Styles

Overall, the legal and policy literature conveys an image of restrictive regulation in Atlantic City, where regulators focus on protecting the public from the inherent harms associated with casinos. This is in contrast to the literature on Las Vegas regulators, who are portrayed as "hands off" until particularly egregious issues require attention (Aronovitz, 2002; Becker, 2007; Cabot et al., 2016; Hicks, 1980; Prum and Bybee, 1999). These portrayals have not been supported with empirical analysis. Although there has been much legal scholarship examining regulatory strategies in these two cities, and a few articles directly comparing Las Vegas to Atlantic City, there has been (to my knowledge) no effort to collect data on gaming violations or the regulatory response to said violations. For the present study, I collected available complaints and disposition files from each regulatory agency's website to examine whether the above theoretical literature is supported in practice.

Predictions

Based on the literature, I expected to see that gaming violations in Las Vegas and Atlantic City were handled differently due to the different reasons for legalization, the unique nature of the industry in each city, the differing missions of the agencies, and other factors. Specifically, I predicted that:

- Las Vegas regulators initiate fewer formal complaints than Atlantic City regulators, due to the "essential" nature of the industry's revenue to the city.
- Las Vegas complaints involve more non-gaming violations, due to the Vegas industry's diversification into non-gaming related activities for tourists.
- Las Vegas is less likely to use fines as a sanctioning mechanism, due to the "essential" nature of the industry's revenue to the city.
- Las Vegas has lower monetary penalties (on average) than Atlantic City, due to the "essential" nature of the industry's revenue to the city.
- Las Vegas complaints include more individual licensees (as opposed to businesses) than Atlantic City because gaming licenses are more readily available to individuals in that jurisdiction.

The Present Study – Methods

For this research I used "content analysis", a method in which documents (or other forms of human communication) are systematically read and certain characteristics are recorded to determine whether any patterns emerge "…in what is included, what meanings are being communicated, the type of vocabulary/images used to convey particular types of messages or how various messages are contextualized within their particular form of media." (Tewksbury, 2009: 46; see also Schutt, 2017). Given that no prior empirical research has examined official responses to violations by gaming licensees, reviewing the available regulatory records provides a foundation for understanding how the law works in practice. The data used in this brief was coded from all available complaints, dispositions, and/or order documents on the Nevada Gaming Control Board and Commission website and the New Jersey Division of Gaming enforcement website.

The complaints and dispositions files from Nevada are available since March of 2009. The New Jersey files have been made available since January 2011. I stopped coding cases after the end of 2016.1 There were a total of 68 cases in Nevada and 149 cases in New Jersey—for the purpose of this analysis, all cases outside of the Las Vegas metropolitan area were dropped (leaving 51 Las Vegas Metro cases in our sample).

The documents varied greatly by jurisdiction in terms of violation and sanction descriptions—therefore, the current analysis focuses on a small set of variables that were similar across the two datasets and that contained enough data to make analysis sensible. Specifically, I examine the following measures:

Table 1: Types of Entities Listed in Agency Documents

	Total	Las Vegas	Atlantic City
# Cases	200	51	149
# Cases involving only Business licensees (% of Total)[a]	162 (81.0%)	25 (49.0%)	137 (91.9%)
# Cases involving only Individual licensees (% of Total)	6 (3.0%)	1 (2.0%)	5 (3.4%)
# Cases involving both Business and Individual licensees (% of Total)	25 (12.5%)	18 (35.3%)	7 (4.7%)
# Cases involving only Sole Proprietor licensees (% of Total)	6 (3.0%)	6 (11.8%)	0 (0.0%)
# Cases involving Casino licensees (% of Total)	145 (72.5%)	28 (54.9%)	117 (78.5%)
# Cases involving Other types of licensees (% of Total)	55 (27.5%)	23 (45.1%)	32 (21.5%)
Average # of respondents listed in complaint	1.36	2	1.15

[a]"Business" licensees include corporate and small business license holders of all types (i.e., casino and non-casino businesses). This compares the regulatory strategy of targeting organizations/businesses as a whole versus individual gaming licensees.

- City where complaint was filed: 1 = Las Vegas Metropolitan Area, 0 = Atlantic City.
- Type of offender: Business licensee only, Individual licensee only, Both types of licensees, or Sole Proprietors.
- Total number of offenders listed in complaint.
- Total # of violations described in complaint.
- Nature of each violation.
- Whether a fine or civil penalty was listed as a sanction.
- Whether another monetary penalty was included in the sanction
- The total monetary penalty assessed in the case.

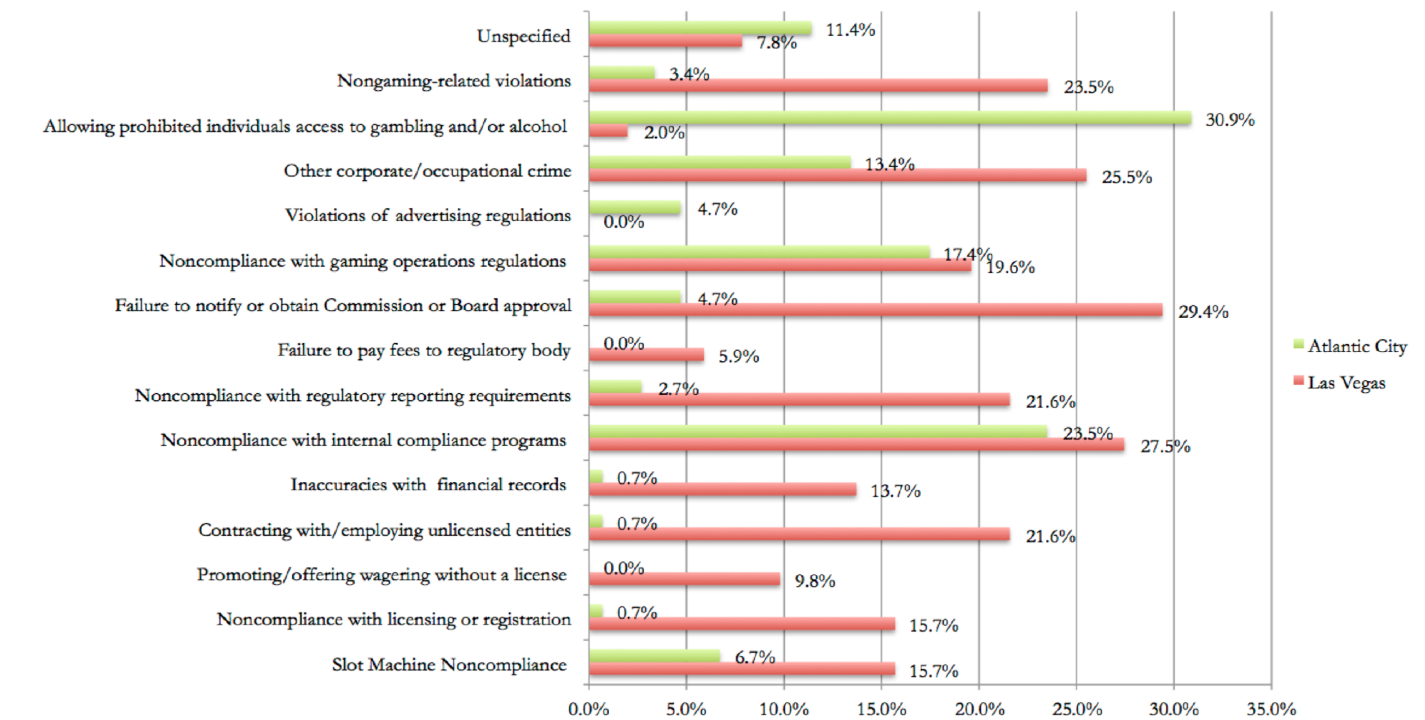
As portrayed in Table 1, out of the 200 cases in our sample, 149 are from Atlantic City and 51 are from Las Vegas, supporting the prediction that Las Vegas regulators initiate fewer formal complaints than Atlantic City regulators.[2] Of those, the majority involved only business licensees across both jurisdictions, but you see that Las Vegas is much more likely than Atlantic City to charge individual licensees along with business licensees (Las Vegas rarely charged individual licensees alone or sole proprietors). This supports my predictions and is likely due to the increased availability of licenses to individuals in Las Vegas. Atlantic City cases were more likely to involve casino licensees, whereas Las Vegas cases were more heterogeneous (i.e., regulators in Las Vegas were more likely to file complaints against small businesses, individuals, etc.). This is likely a result of the industry structure in Las Vegas, where gaming licenses are available to many more types of establishments (e.g., supermarkets, small bars, etc.).Table 1 also demonstrates that complaints tended to include a small number of respondents—1.36 overall, 2.0 in Las Vegas and 1.15 for New Jersey.

Table 2 shows that, on average, complaints cited licensees for about 2.43 different violations. However, note that the Las Vegas complaints contained many more violations than New Jersey violations—6.51 on average compared to 1.09 in Atlantic City. Additionally, the number of different types of behaviors was, on average, higher in the Las Vegas files than the New Jersey files—2.48 different behaviors in Las Vegas compared to 1.23 behaviors

Figure 1 provides the frequencies of the different types of behaviors—overall and by jurisdiction.3 Overall, complaints/violations in Las Vegas are more likely to involve slot machines, licensing/registration noncompliance (including failing to obtain license/registration, offering wagering without a license, or contracting with/employing an unlicensed entity), inaccuracies in corporate financial records, noncompliance with regulatory requirements or fee payment, failure to obtain approval from the regulatory agencies, other corporate/occupational crimes, and other non-gaming violations (e.g., drug crimes, nightclub issues). The finding that Las Vegas licensees are more likely to be cited for "other" corporate and occupational crimes and non-gaming violations supports our predictions related to the increased provision of non-gaming activities in Las Vegas. Atlantic City casinos, on the other hand, were more likely to be cited for violations of advertising regulations and allowing self-excluded gamblers or minors access to gambling or alcohol. These files were also more likely to have vague descriptions about unspecified misconduct. Both cities were similar with regard to the number of violations for noncompliance in gaming operations and noncompliance with internal compliance programs.

Table 3 describes the types of sanctions meted out for violations. Both jurisdictions used fines/civil penalties as a sanction the vast majority of the time—in 90.0% of cases overall, 84.3% of Las Vegas cases, and 91.9% of Atlantic City cases. This supports, somewhat, our prediction that Vegas would be less likely to use fines/civil penalties than Atlantic City. Las Vegas was much more likely than Atlantic City to include other financial costs in the sanctions. Also, Las Vegas' financial penalties were much higher than the average Atlantic City sanction, although this is partially due to some extreme values in Las Vegas sanctions. Out of 51 Las Vegas cases, 6 involved monetary fines of $1,000,000 or more. The largest fine in Atlantic City was $225,000 (given twice). If the "median", or midpoint, values of monetary sanctions in each city are used, they are more similar ($10,000 for Las Vegas and $6,000 for Atlantic City). Generally, though, the evidence suggests that Las Vegas regulators sanction their licensees more punitively than Atlantic City regulators, which goes against my predictions. Las Vegas was also much more likely to place conditions on the licenses or revoke those licenses.

Figure 1: Percent of Cases (Within Jurisdictions) Involving Various Violations



Note: One case could list many different types of behaviors, so the percentages reported are going to add to more than 100%.
Note: A "vague statement about misconduct" refers to regulatory descriptions that do not specify the behavior subject to complaint. For example, a case file may describe "conduct that compromises the integrity of the industry" without detail.

Table 2: Types of Behaviors Listed in Agency Documents

	Total	Las Vegas	Atlantic City
# Cases	200	51	149
Average # violations listed in complaint	2.48	6.51	1.09
Variety of violations—average # of *different types* of violations listed in complaints	1.54	2.48	1.23

Discussion and Conclusions

Overall, the types of behaviors and licensees subjected to formal complaints differ between the two cities. The licensees in Las Vegas were more often cited for nongaming violations, which is likely due to the increased opportunities for nongaming activities in that city. Also, Las Vegas licensees were cited more often for violations of licensing procedures. The Nevada Gaming Control Board and Gaming Commission allow more people to get licensed, but are very strict about making sure that people fill out the paperwork as a means of controlling the industry. Similarly, there were more violations involving notifications or getting approval from the regulators in Las Vegas—the regulators in Nevada take a less interventionist approach, more self-regulatory in nature, which makes paperwork and self-disclosures much more important in this city.

Violations in Atlantic City were more likely to involve advertising regulations, access to gambling by self-excluded gamblers or minors, and alcohol consumption by minors. I think, overall, these regulatory priorities demonstrate New Jersey's more "protectionist" stance towards consumers of gambling. In New Jersey, the self-excluded gaming list is run and monitored by the state agency (though licensees are expected to ensure that those on excluded list do not receive credit or promotional mailings; Morse and Goss, 2007), whereas in Nevada, each casino is expected to have its own self-excluded list and is responsible for monitoring it. New Jersey's self-exclusion program includes options for excluding oneself from casino premises or from internet gambling options only, and allows people to self-exclude for a minimum of 1 year, 5 years, or a lifetime.4 Nevada regulators have no detailed guidelines for self-exclusion program duration, aside from stipulating a 30-day minimum self-exclusion period for interactive gaming exclusion programs.

Another interesting difference is the number of violations per city—Las Vegas was much more likely to include more violations, which might be an indicator of the regulatory strategy there. In particular, Las Vegas regulators seem to start with a more cooperative approach and then escalate sanctions to a formal complaint only after the licensee has failed to comply after previous attempts. Interestingly, Atlantic City regulators are slightly more likely to recommend a civil penalty, but do not impose monetary sanctions nearly as high as the Las Vegas

Table 3: Types of Sanctions Used

	Total	Las Vegas	Atlantic City
# Cases	200	51	149
% using fine/civil penalty as sanction	180 (90.0%)	43 (84.3%)	137 (91.9%)
% in which other costs incorporated into sanctions	14 (7.0%)	13 (25.5%)	1 (0.7%)
Average $ penalty (when given)	$102,066.77	$374,236.33 (Range: $1,000 - $5,500,000)	$17,260.32 (Range: $500 – $225,000)
% cases where complaint was withdrawn or dismissed	5 (2.5%)	2 (3.9%)	3 (2.0%)
% Cases where license was revoked or conditions placed on license	15 (7.5%)	13 (25.5%)	2 (3.9%)

Gaming Commission. This might be the result of a more interventionist and punitive regulatory style generally, but one that recognizes the economic instability of the industry.

In general, I think these differences are signs that the larger sociopolitical environment impacts regulatory priorities and processes, even within the same industry where similar structural contradictions exist across jurisdictions. In both places, regulators must help legitimize the industry but also (and perhaps do so by) protecting the public. Las Vegas regulators view gambling as an important form of individual recreation and do little to restrict access to it; they also trust the licensees to self-regulate but respond punitively (using fines and license revocations/conditions) when internal compliance efforts fail. They are also able to place heavy fines on their licensees, which likely reflects the profitability of the industry there (i.e., more money can be made from an individual licensee's fines). In contrast, Atlantic City regulators focus more on gambling as a vice, one that should not be readily available and one that needs to be monitored closely and sanctioned more quickly when violations occur. Although they bring more cases and sanction more often using civil fines, they are constrained by the economic environment in their ability to fine individual licensees heavily.[5] By understanding the structural contradictions inherent in regulating a vice industry such as gaming, better policies can be designed that will protect consumers while also retaining the benefits from the gaming industry.

Specifically, it seems that jurisdictions might benefit from explicitly linking (i.e., in writing) the purpose of gambling to the regulatory response they desire. In Las Vegas, gambling has been supported as a primary source of revenue for the city and state, an industry to be promoted and supported, and one that should be highly competitive and accessible to large groups of people. With the "cleaning up" of the industry of organized crime influences, strict licensing requirements were espoused as the primary crime control feature, but the Nevada Gaming Control Board/Commission was also given much discretion and broad authority to monitor and regulate the industry. This data implies that (in keeping with the purpose of legalization) the Gaming Control Board/Commission works to support the industry and maintain competition, that they monitor licensees and intervene in a broad set of activities, but tend to escalate to formal complaints less quickly than their Atlantic City counterparts. Instead, the Las Vegas licensees are expected to monitor themselves for compliance and compete with one another for customers (leading to consumer protection efforts)—it is only when licensees fail to adequately self-regulate that the regulators step in.

On the other hand, Atlantic City legalized gambling for a fairly narrow purpose—to provide assistance to vulnerable citizens and help revitalize a small part of the city. The promotion of the industry there has not been a priority; if anything, it seems that the legislature has historically wanted to keep the industry there constrained. Instead of seeing competition as a means for consumer protection, the regulatory structure there has limited the number of gambling options and instead assumes consumer protection efforts as a state responsibility. The data implies that the state is more willing to file formal complaints than the Las Vegas regulators, but tends to impose lower monetary penalties. Some criticize the interventionist approach by regulators in Atlantic City, but it seems that such a strategy accomplishes their goals more effectively than taking a more self-regulatory approach would have. Although the Atlantic City gambling industry has not been as successful as that in Las Vegas, it is unclear whether a different regulatory approach would have been appropriate for a city clearly concerned about relying on gambling as a revenue stream.

Ultimately, the structural contradictions within an industry are governed by the needs, desires, and fears of the population. Regulators in all locations will benefit from understanding the reasons that the legislature legalized gambling, whether regulators are expected to help promote or constrain the industry, and how their local residents and policymakers feel about gambling and its consequences/benefits. In doing so, the regulator (again, acting as an agent of the state) can engage licensees and citizens in a discussion of how to maximize the benefits desired by the state while minimizing the potential burdens on the citizens. By including public-interest groups in the regulatory process, potential claims of "industry capture" are minimized, trust can be built between the industry and the public as well as between the regulators and the public, and the regulators are better able to communicate with licensees about what is expected of them from their local stakeholders (Ayres and Braithwaite, 1991; Rorie, 2015). By bringing licensees and the public to the table with regulators, it would be easier to create regulations and problem-solving solutions that are more likely to be adopted by firms and accepted by local citizens. Furthermore, regulators can educate licensees about proactive, socially responsible behaviors desired by the public—such behaviors could improve the community as well as the reputation of the industry. In contrast, when a licensee does violate regulations, having public participation in the regulatory process can enhance the effectiveness of sanctions, as companies are highly motivated to repair their public reputation (Ayres and Braithwaite, 1991; Braithwaite, 1989; Makkai and Braithwaite, 1994).

Limitations and Future Research

There are a variety of limitations with regard to the data that warrant mention. The primary issue is that I am using only publicly-available information which, of course, impacts the conclusions made. These documents are official government reports and are not designed for research purposes; much information of interest is not consistently recorded. For example, it seems likely that regulators use additional, non-public strategies to discipline licensees, such as informal discussions, warning letters, inspection scores, etc. To the extent that regulators use those strategies, I have not captured those in this report. In the Atlantic City data specifically, I often do not have more than the order documents—that is, I do not have the more descriptive complaint and disposition documents. Furthermore, data come only from documents available on the regulatory agency websites, which represents a relatively small sliver of time—since 2011 in Atlantic City and since 2009 in Las Vegas. Also related to the use of official data is that, obviously, only the government's perspective is represented. I am unable to determine whether the differences in jurisdictions truly reflect regulatory priorities or whether gaming licensees in the two jurisdictions are actually engaging in more/less violations of a certain type. Given all of these shortcomings of the data, I would like to emphasize that there is much more planned for this research project—I plan to request more data, request interviews with regulators and licensees, find more contextual data from existing sources, and add to the databases more generally.

Mission Statements of the Agencies

The Nevada Gaming Control Board and Commission website describes the regulatory mission as such:

- The Nevada Gaming Commission and the Nevada Gaming Control Board govern Nevada's gaming industry through strict regulation of all persons, locations, practices, associations and related activities. We protect the integrity and stability of the industry through our investigative and licensing practices, and we enforce laws and regulations, while holding gaming licensees to high standards. Through these practices, we are able to ensure the proper collection of taxes and fees that are an essential source of revenue for Nevada. (2017a, emphasis added)

The New Jersey Casino Control Commission and Attorney General's Division of Gaming Enforcement missions state that:

- "The Casino Control Commission promotes public confidence and trust in the credibility and integrity of the gaming industry as an independent licensing authority. The Commission openly fosters partnerships and collaborates with all stakeholders while upholding objective and ethical standards with professionalism and integrity." (2017a, emphasis added)
- "[The Division of Gaming Enforcement's] mission is to protect the public interest by maintaining a legitimate and viable industry, free from the influences of organized crime, and assuring the honesty, good character and integrity of casino owners, operators, employees and vendors. The Division performs this mission through enforcement of the Casino Control Act, and the regulations promulgated thereunder which mandate a strictly regulated and economically sound industry." (2017a, emphasis added)

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END NOTES

i. As of April 2017, the Nevada Gaming Control Board/ Commission has not updated the complaints/disposition files available online since August 2016.

ii. One can also find support for the more legalistic approach of Atlantic City regulators by comparing the “black books” or mandatory casino exclusion lists in the two cities. Since each agency’s inception (1955 for Nevada, 1978 for New Jersey) through May 2017, Nevada has excluded only 31 individuals compared to New Jersey’s exclusion of 445 people (see Nevada Gaming Control Board and Commission, 2017; New Jersey Division of Gaming Enforcement, 2017).

iii. Note that one case could list many different types of behaviors, so the percentages reported are going to add to more than 100%.

iv. See the New Jersey Division of Gaming Enforcement’s Self- Exclusion Program brochure: http://www.nj.gov/oag/ge/docs/brochure_selfexclusion_2013.pdf

v. According to the complaints/dispositions/orders documents, the Las Vegas fines are paid directly to the Nevada Gaming Commission. Atlantic City fines are paid to the Casino Revenue Fund, which provides assistance for elderly and disabled citizens (State of New Jersey Casino Revenue Fund Advisory Commission, n.d.).

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