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**ARC PUBLIC COMMENTS SUMMARY FOR
PROPOSED CASINO GAMING RULES**

As required by Arkansas law, the Arkansas Racing Commission (hereinafter, "Commission" or "ARC") published a public notice that ran in the Arkansas Democrat-Gazette on January 13, 14 and 15, notifying the public of the Commission's intent to consider the adoption of Rules governing Casino Gaming in Arkansas. The Notice set the deadline for written comments to be submitted by Monday, February 18, 2019, at the close of business, and verbal comments / statements may be made by any person at the Arkansas Racing Commission meeting set for February 21, 2019, at 11:00 a.m.

The proposed Rules contain 25 different sections governing casino gaming, licensure of casinos, and auditing / reporting requirements for casinos. However, the written public comments received by the Commission almost exclusively deal with two issues, both of which center on proposed Rule 2(4)(b), which states:

- (b) All casino applicants for a casino license in Pope County and Jefferson County are required to submit either a letter of support from the county judge or a resolution from the quorum court in the county where the proposed casino is to be located and, if the proposed casino is to be located within a city or town, are also required to submit a letter of support from the mayor in the city or town where the casino applicant is proposing the casino to be located. All letters of support or resolutions by the Quorum Court, required by these Rules and the Amendment, shall be dated and signed by the County Judge, Quorum Court members, or Mayor holding office at the time of the submission of an application for a casino gaming license.

This Rule is an attempt to comply with the requirements of Amendment 100, which in Section 4(N), states:

- (n) The Arkansas Racing Commission shall require all casino applicants for a casino license in Pope County and Jefferson County to submit either a letter of support from the county judge or a resolution from the quorum court in the county where the proposed casino is to be located and, if the proposed casino is to be located within a city or town,

shall also require all casino applicants to include a letter of support from the mayor in the city or town where the applicant is proposing the casino to be located.

This issue has generated a lot of public comments because, prior to the end of their terms in late 2018, the outgoing Pope County Judge and outgoing Mayor of Russellville issued letters of support for the Gulfside Casino to be selected to open a casino in Pope County. These letters of support were after the effective date of Amendment 100 but before the Casino Gaming Rules were adopted, and before the application process had been established by the Commission. The current Pope County Judge and Russellville Mayor have issued strong statements against any casino being granted a license to open in Pope County. This controversy that currently exists in Pope County has generated the vast majority of the written comments submitted to the Arkansas Racing Commission.

This report summarizing the public comments received by the ARC on the proposed casino gaming rules is divided into three sections. Section I contains comments supporting a casino in Pope County and supporting requiring the ARC to consider the letters of support issued by the former Pope County Judge and former Mayor of Russellville. Section II contains comments in support of proposed Rule 2 requiring that letters of support be issued by the current County Judge, Quorum Court and Mayor for casinos in Pope and Jefferson counties. This section also contains comments opposing a casino in Pope County. Section III contains comments on issues unrelated to Rule 2 and the requirements for letters of support.

Section I

I. Anonymous letter supports casino in Pope County and urges acceptance of letter of support from former County Judge; no comment on proposed Rules.

2. Anonymous letter (received 02-15-19) supports casino in Pope County and urges acceptance of letter of support from former County Judge and Mayor; no comment on proposed Rules.

3. Anonymous letter -- the ARC received an anonymous letter in the mail containing Resolution No. 1695 dated August 16, 2018, from the City of Russellville signed by Mayor Randy Horton; the Resolution, in Section 1, objects to Amendment 100 because the Amendment fails to require a separate subsequent special local election approving or rejecting a casino in Pope County; Section 2 of the Resolution states that if Amendment 100 fails in Pope County, then the City Council requests that the Mayor not issue a letter of support to the ARC; also attached is what appears to be an unsigned Resolution of the Pope County Quorum Court urging the County Judge not to issue a letter of support for a casino if Amendment 100 fails in the November 2018 election in Pope County.

4. DeLynn Smithers, Pope County resident, supports a casino in Pope County; no comment on any specific proposed rule or section of the proposed Rules; second written comment urges ARC to give weight to the voice of county voters in the application process and recognize the local county Ordinance requiring a vote prior to issuance of letters of support.

5. Anonymous letter supports a casino in Pope County and urges ARC to accept letters of support from previous County Judge and Mayor; cites anti-casino bias of current county officials.

6. Anonymous letter from Pope County Business Owner supports casino in Pope County and urges ARC to consider letters of support issued by former Pope County Judge and Russellville Mayor.

7. Anonymous letter from Russellville Citizen supports casino in Russellville and letters of support issued by former County Judge and Mayor.

8. J. Brad (full name unknown – email incomplete), supports use and consideration of letters of support issued by former County Judge and Mayor; opposes proposed version of Rule 2.

9. Linda Bankton supports casino in Pope County and letters of support issued by former County Judge and Mayor; suggests that if current Mayor does not support the casino in Russellville, then she supports the casino being in Pope County but outside of Russellville city limits.

10. Big Piney Cabins email address; no name included; in favor of casino; urges ARC to consider letters of support from former County Judge and Mayor.

11. Sarah Billyard, Pope County resident, supports Gulfside casino in Russellville; no comment on proposed Rules.

12. Michael Brafford urges ARC to consider valid the letters of support written by former County Judge Jim Ed Gibson and Russellville Mayor Randy Horton; supports a casino in Pope County.

13. Johnny Brown, Pope County resident, supports former version of Rule 2; asks for consideration of former officials' letters of support; and supports a casino in Pope County.

14. Laura Brown, Pope County resident, opposes current proposed Rule 2; urges acceptance of former officials' letters of support; and supports a casino in Pope County.

15. Daveline Davis, Pope County resident, in favor of allowing letters of support from former County Judge and Mayor; opposes proposed Rule 2 requiring current County Judge and Mayor to sign letters of support.

16. S.J. Cook, Pope County resident, opposes proposed Rule 2 and supports acceptance of letters of support from former County Judge and Mayor for casino.

17. Maria Gatica, Pope County resident, supports casino in Pope County; urges ARC to consider letters of support from former County Judge and Mayor.

18. Steve Gist, Pope County resident, only comment, "Please no casino in Pope County."

19. Ricky Hewitt, Pope County resident, opposes proposed version of Rule 2; and supports a casino in Pope County.

20. Bentley Hollingsworth, Pope County resident, supports casino and opposes proposed version of Rule 2.

21. Roselinda Johnson, Ed.D. opposes proposed Rule 2; states letters of support from former Mayor and County Judge should be considered valid.

22. Jenna Manning asks that ARC keep and consider letters of support of former County Judge and Mayor; in favor of a casino.

23. Jason McGee, Pope County resident, supports a casino in Pope County and urges ARC to accept letters of support from former Pope County Judge and Mayor of Russellville.

24. Jon Price, Pope County resident, supports letters of support from former County Judge and Mayor for casino, supports casino in Pope County to lower taxes in the county.

25. Diane Rhoads, Pope County resident, supports use of letters of support by former County Judge and Mayor.

26. Eli Thomas, Pope County resident, opposes proposed version of Rule 2; urges acceptance of letters of support from former Pope County Judge and Russellville Mayor; and supports casino in Pope County.

27. Keith Thomas, Pope County resident, opposes Rule 2; urges acceptance of letters of support from former Pope County Judge and Russellville Mayor; in favor of a casino in Pope County.

28. Robin Thomas, Pope County resident, opposes proposed version of Rule 2; urges acceptance of former officials' letters of support; and supports a casino in Pope County.

29. Victoria "Tori" Thomas, Pope County resident, opposes proposed version of Rule 2; urges acceptance of former officials' letters of support; and supports a casino in Pope County.

Section II

30. Anonymous supports proposed Rule 2 requiring letters of support from current County Judge and Mayor; cites Pope County ordinance requiring an election prior to issuance of letters of support.

31. Kathryn Atwood, Pope County resident, supports proposed Rule 2 requiring letters of support from current County Judge and Mayor; requests vote by Pope County voters prior to issuance of letters of support.

32. Carolyn Barefield, Pope County resident, opposes casino in Pope County; supports proposed Rule 2 requiring letters of support from current County Judge and Mayor.

33. Mary J. Barnes, Pope County resident, supports proposed Rule 2 requiring letters of support from current County Judge and Mayor.

34. Amparo Bartlett, Pope County resident, opposes the acceptance of letters of support written by former County Judge and Mayor.

35. David and Becky Bauman, Pope County residents, support proposed Rule 2 requiring letters of support from current County Judge, Quorum Court and Mayor.

36. Amanda Beene supports proposed Rule 2 requiring letters of support from current County Judge, Quorum Court and Mayor; cites local Pope County ordinance passed by 68% of voters requiring a local election before letters of support for a casino are issued.

37. Allen Blackford supports proposed Rule 2 requiring only current sitting officials to be allowed to sign letters of support for casinos; opposes use of letters from former County Judge Jim Ed Gibson and Russellville Mayor Randy Horton.

38. Dennis Boyd, Pope County resident, supports proposed Rule 2 requiring letters of support from current County Judge and Mayor; cites 68% approval of local ordinance requiring

election before letters of support for a casino are issued by County Judge, Mayor or Quorum Court.

39. Shannon Bradford, Pope County resident, opposes casino in Pope County without a local election; supports proposed Rule 2 for letters of support from current County Judge, Quorum Court and Mayor; critical of previous County Judge's and Russellville Mayor's support of casino.

40. Sandra Bradley supports proposed Rule 2 requiring letters of support from current County Judge and Mayor.

41. Allen Brewer, Pope County resident, supports proposed Rule 2 requiring current County Judge and Mayor to sign letters of support; cites local Pope County ordinance passed with 68% majority calling for an election before letters of support are issued; attaches copies of resolutions from Pope County and Russellville City Council regarding local elections prior to letters of support being issued for a casino.

42. Angela Brewer, Pope County resident, supports proposed Rule 2 requiring current County Judge and Mayor to sign letters of support; cites local Pope County ordinance passed with 68% majority calling for an election before letters of support are issued; attaches copies of resolutions from Pope County and Russellville City Council regarding local elections prior to letters of support being issued for a casino.

43. Bruce Brown, Pope County resident, supports proposed Rule 2 requiring letters of support from current Mayor and County Judge; supports Pope County vote against casino.

44. Patricia Bubbus, Pope County resident, supports proposed Rule 2 requiring letters of support from current Mayor, Quorum Court and County Judge.

45. Don Burnham, Pope County resident, supports proposed Rule 2 requiring letters of support from current County Judge, Quorum Court and Mayor; cites local ordinance that passed by 68% majority requiring local election before letters of support are issued by Mayor, Quorum Court and County Judge.

46. Linda Burnham, Pope County resident, supports proposed Rule 2 requiring letters of support from current County Judge, Quorum Court and Mayor; cites local ordinance that passed by 68% majority requiring local election before letters of support are issued by Mayor, Quorum Court and County Judge.

47. Regina Burris, Pope County resident, supports proposed Rule 2 requiring letters of support from current County Judge, Quorum Court and Mayor; cites passage of local ordinance requiring election before officials issue a letter of support for a casino.

48. Jim Clark opposes casino; urges ARC to listen to current officials in Pope County; no comment on any specific provision of proposed Rules.

49. State Representative Joe Cloud, M.D., Pope County resident, supports proposed Rule 2 requiring current County Judge and Mayor to sign letters of support; cites Pope County ordinance requiring vote prior to issuance of letters of support.

50. James Corbin, Pope County resident, requests that ARC take note of Pope County ordinance that passed by 68% requiring local election before letters of support are issued; no comment on proposed Rules.

51. Danny Cosby, Pope County resident, supports proposed Rule 2 requiring current County Judge and Mayor to sign letters of support; cites 68% vote in Pope County for ordinance requiring election before issuance of letters of support.

52. Mary Cosby, Pope County resident, supports proposed Rule 2 requiring letters of support from current County Judge and Mayor; points out that Pope County voters passed an ordinance with 68% in favor of requiring an election in Pope County prior to the issuance of a letter of support from a County Judge and Mayor.

53. Martha Cousar, Pope County resident, supports proposed Rule 2 requiring current County Judge and Mayor to sign letters of support; supports a requirement for a local election.

54. Diana Crites supports proposed Rule 2 requiring letters of support from current County Judge and Mayor; cites Pope County ordinance requiring election before officials issue letters of support.

55. J. Crites supports proposed version of Rule 2 requiring letters of support to be issued by current County Judge and Mayor; cites Pope County voters' passage of local ordinance by 68% majority requiring election before officials issue a letter of support for a casino.

56. Gaye Croom, Pope County resident, supports proposed Rule 2 requiring letters of support from current County Judge, Quorum Court and Mayor; cites passage of local ordinance requiring election before officials issue a letter of support for a casino.

57. M.M. Croom, Jr. supports proposed Rule 2 requiring letters of support from current County Judge, Quorum Court and Mayor; cites passage of local ordinance requiring election before officials issue a letter of support for a casino.

58. Hon. Ben Cross, Pope County Judge, supports proposed Rule 2 requiring current County Judge and Mayor to sign letters of support; cites November 6, 2018, General Election results where 60.58% of Pope County voters voted against Amendment 100; submits Executive Order regarding letters of support, stating they must comply with Arkansas law and Amendment 100.

59. Don and Synda Daily, Pope County residents, support proposed version of Rule 2 requiring letters of support from current County Judge and Mayor.

60. State Senator Breanne Davis, Pope County resident, supports proposed Rule 2 requiring letters of support from current County Judge, Quorum Court and Mayor; points out 60% of voters in Pope County opposed casino in general election, and decision on casino should be made after thoughtful community consideration.

61. Gary and Evelyn Denton, Pope County residents, support proposed Rule 2 requiring letters of support from current County Judge and Mayor; state majority of voters do not want a casino in Pope County.

62. Chad Duvall, Pope County resident, supports proposed Rule 2 requiring current County Judge and Mayor to sign letters of support; cites local Pope County ordinance passed with 68% majority calling for an election before letters of support are issued.

63. Debra Duvall, Pope County resident, supports proposed Rule 2 requiring letters of support from current County Judge and Mayor; cites strong local opposition to casino.

64. Norma Duvall supports proposed Rule 2 requiring letters of support from current County Judge, Quorum Court and Mayor; cites passage of local ordinance by 68% requiring an election in Pope County prior to issuance of letters of support.

65. Judith Ellis, Pope County resident, supports proposed Rule 2 requiring current County Judge and Mayor to sign letters of support; cites local Pope County ordinance passed with 68% majority calling for an election before letters of support are issued.

66. Pam Ennis, Pope County Clerk, submits a letter signed by 11 of 13 members of Pope County Quorum Court dated February 7, 2019, supporting proposed Rule 2 requiring letters of support to be signed by current County Judge, Quorum Court and Mayor; cites local Pope County ordinance passed with 68% majority calling for an election before letters of support are issued; asks ARC to respect voters of Pope County who oppose a casino in Pope County.

67. Lori Eshnaur, Pope County resident, supports proposed Rule 2 requiring letters of support from current County Judge and Mayor; does not want a casino in Pope County.

68. Iris Ferguson, Pope County resident, supports proposed Rule 2 requiring letters of support from current County Judge and Mayor; points out that Pope County voters passed an ordinance with 68% in favor of requiring an election in Pope County prior to the issuance of a letter of support from a County Judge and Mayor.

69. Johnny Ferguson, Pope County resident, supports proposed Rule 2 requiring letters of support from current County Judge and Mayor; requests vote by Pope County voters prior to issuance of letters of support.

70. Carol Fields, Pope County resident, supports proposed Rule 2 requiring letters of support from current County Judge and Mayor; requests vote by Pope County voters prior to issuance of letters of support.

71. Lee Fields, Pope County resident, supports proposed Rule 2 requiring letters of support from current County Judge and Mayor; requests vote by Pope County voters prior to issuance of letters of support.

72. Dennis W. Fleniken, Pope County resident, supports proposed Rule 2 requiring letters of support from current County Judge, Quorum Court and Mayor; cites passage of local ordinance requiring election before officials issue a letter of support for a casino.

73. Shelia Fletcher, Pope County resident, supports proposed Rule 2 requiring letters of support from current County Judge, Quorum Court and Mayor; cites Pope County vote opposing a casino.

74. State Representative Vivian Flowers, Pine Bluff, Arkansas, supports proposed Rule 2 requiring letters of support from current County Judge, Quorum Court and Mayor; supports recommendations submitted by Keith Miller regarding measures to prevent and address gambling addiction; supports limits on placement of ATMs and self-exclusion programs / rules.

75. Peggy Foster supports proposed Rule 2 requiring letters of support from current County Judge, Quorum Court and Mayor; cites local ordinance that passed by 68% majority requiring local election before letters of support are issued for a casino.

76. Janet Fryar, Pope County resident, supports proposed Rule 2 requiring letters from current County Judge and Mayor.

77. Janet Fryar, second written comment, urges the ARC not to accept a resolution from the Pope County Quorum Court because a resolution is only an expression of policy by the Court and shall not serve to compel any executive action; states Amendment 100 may conflict with rules governing County Judge's actions.

78. Roger Fryar, Pope County resident, supports proposed Rule 2 requiring letters from current County Judge and Mayor.

79. Allan George, Pope County resident, supports proposed Rule 2 requiring letters of support from current County Judge and Mayor; cites Pope County ordinance requiring a vote before letters of support are issued.

80. Darlene Glover supports proposed Rule 2 requiring letters of support from current County Judge and Mayor; cites Pope County ordinance requiring an election prior to issuance of letters of support.

81. James Glover supports proposed Rule 2 requiring letters of support from current County Judge and Mayor; cites Pope County ordinance requiring an election prior to issuance of letters of support.

82. Cliff Goodin, Pope County resident, supports proposed version of Rule 2 requiring letters of support from current County Judge and Mayor.

83. Sara Lou Goodin, Pope County resident, supports proposed Rule 2 requiring letters from current County Judge and Mayor; also urges a vote in Pope County before a casino license is granted per Pope County ordinance.

84. Robert Gunter supports proposed Rule 2 requiring current County Judge and Mayor to sign letters of support; cites Pope County ordinance requiring vote prior to issuance of letters of support.

85. Mary and Peter Haggard support proposed Rule 2 requiring letters of support from current County Judge, Quorum Court and Mayor; cite local ordinance requiring election before officials issue a letter of support for a casino.

86. Dana Halbert, Pope County resident, supports proposed Rule 2 requiring letters of support from current Mayor, County Judge and Quorum Court; cites local ordinance passed in Pope County by 68% requiring an election prior to issuance of letters of support; opposes a casino in Pope County.

87. Shirley Hankins supports proposed Rule 2 requiring letters of support from current County Judge, Quorum Court and Mayor; cites local ordinance that passed by 68% majority requiring local election before letters of support are issued by Mayor, Quorum Court and County Judge.

88. Jane Harrell, Pope County resident, supports proposed Rule 2 requiring letters of support from current County Judge, Quorum Court and Mayor; requests ARC take note of the 68% vote in favor of an election prior to issuance of letters of support for a casino.

89. Rick Harrell, Pope County resident and Russellville City Alderman, supports proposed Rule 2 requiring letters of support from current County Judge, Quorum Court and Mayor.

90. Barbara Harris supports proposed version of Rule 2 requiring letters of support to be issued by current County Judge and Mayor; cites Pope County voters' passage of local ordinance by 68% majority requiring election before officials issue a letter of support for a casino.

91. Richard Harris, Mayor of Russellville, supports proposed Rule 2 requiring letters of support from current County Judge, Quorum Court and Mayor; cites Senate Bill 185 requiring current elected officials to issue letters of support; states Senate Bill 185 should pass the House and become law; states citizens should be able to hold their current officials accountable as required by Rule 2 and Senate Bill 185.

92. Kay Haulmark, Pope County resident, supports proposed Rule 2 requiring letters of support from current County Judge, Quorum Court and Mayor; cites passage of local ordinance requiring election before officials issue a letter of support for a casino.

93. Kenny Haulmark, Pope County resident, supports proposed Rule 2 requiring letters of support from current County Judge, Quorum Court and Mayor; cites passage of local ordinance requiring election before officials issue a letter of support for a casino.

94. Marian Henderson, Pope County resident, supports proposed Rule 2 requiring letters of support from current County Judge, Quorum Court and Mayor; opposes a casino in Pope County.

95. Leslie Hesselbein, Pope County resident, supports proposed Rule 2 requiring letters of support from current County Judge, Quorum Court and Mayor; supports local option vote, although not addressed by the proposed Rules.

96. Missy Hines, Pope County resident, supports proposed Rule 2 requiring letters of support from current County Judge and Mayor; supports local option election.

97. Christopher Hooper, Pope County resident, supports proposed Rule 2 requiring letters of support from current County Judge, Quorum Court and Mayor; opposes a casino in Pope County.

98. Carolyn Horn, Pope County resident, supports proposed Rule 2 requiring letters of support from current County Judge, Quorum Court and Mayor; hopes ARC will consider voice of county voters in the application process.

99. Billy Hubbard, Pope County resident, supports proposed Rule 2 requiring letters of support from current County Judge, Quorum Court and Mayor at the time of application; points out county ordinance passed with 68% majority requiring a vote before letters of support are issued.

100. Dan Huckabay, Pope County resident, supports proposed Rule 2 requiring letters of support from current County Judge, Quorum Court and Mayor.

101. Larry Humphrey, Pope County resident, supports proposed Rule 2 requiring letters of support from current County Judge, Quorum Court and Mayor.

102. Sharon Humphrey, Pope County resident, supports proposed Rule 2 requiring letters of support from current County Judge, Quorum Court and Mayor.

103. Kristi Hunter, Pope County resident, supports proposed Rule 2 requiring letters of support from current County Judge, Quorum Court and Mayor.

104. Julie Jacobson, Pope County resident, supports proposed Rule 2 requiring letters of support from current County Judge, Quorum Court and Mayor; cites county vote against casino in Pope County.

105. Bonnie Jarman supports proposed Rule 2 requiring current County Judge and Mayor to sign letters of support; cites Pope County ordinance requiring vote prior to issuance of letters of support.

106. Elizabeth (Bettye) A. Jenkins, Pope County resident, supports proposed Rule 2 requiring letters of support from current County Judge, Quorum Court and Mayor; expresses hope that ARC will give weight to the voice of the county voters in the application process.

107. Miles Johnson, Pope County resident, supports proposed Rule 2 requiring that letters of support be issued by current County Judge and Mayor; requests ARC require an election in Pope County prior to accepting letters of support from current County Judge and Mayor.

108. Nancy and Jay Johnson, Pope County residents, support proposed Rule 2 requiring letters of support from current County Judge and Mayor; request ARC take note of the 68% vote in favor of an election prior to issuance of letters of support for a casino.

109. Danny Johnston, Pope County resident, supports proposed Rule 2 requiring current County Judge and Mayor to sign letters of support; cites local Pope County ordinance passed with 68% majority calling for an election before letters of support are issued.

110. Bob Jones, Pope County resident, supports proposed Rule 2 requiring letters of support from current County Judge, Quorum Court and Mayor.

111. Carla Jones, Pope County resident, supports proposed Rule 2 requiring letters of support from current County Judge, Quorum Court and Mayor.

112. John Henry Jones, Pope County resident, requests ARC to give weight to voters of Pope County who opposed a casino and passed ordinance requiring a local option election.

113. Linda C. Jones, Pope County resident, supports proposed Rule 2 requiring letters of support from current County Judge, Quorum Court and Mayor; cites local ordinance passed by 68% of voters requiring a local election before letters of support are issued.

114. Linda Kay Jones supports proposed version of Rule 2 requiring letters of support to be issued by current County Judge and Mayor; cites Pope County voters' passage of local ordinance by 68% majority requiring election before officials issue a letter of support for a casino; requests ARC to give weight to voters of Pope County who opposed a casino and passed the local ordinance requiring a local option election.

115. Matt Jones supports proposed Rule 2 requiring letters of support by current County Judge, Quorum Court and Mayor.

116. Geoff Kelley, Pope County resident, supports proposed Rule 2 requiring letters of support by current County Judge, Quorum Court and Mayor.

117. Melanie Kelley, Pope County resident, supports proposed Rule 2 requiring letters of support from current County Judge, Quorum Court and Mayor.

118. Robert M. Kinsey, Pope County resident, supports proposed Rule 2 requiring letters of support from current County Judge, Quorum Court and Mayor.

119. Amberly Knight, Pope County resident, opposes a casino; supports proposed Rule 2 requiring letters of support from current County Judge and Quorum Court; cites Amendment 100 defeated in Pope County and passage of local ordinance requiring local option election.

120. Jim Knight supports current proposed language of Rule 2 requiring letters of support from current County Judge and Mayor; also urges a vote in Pope County before a casino license is granted per Pope County ordinance.

121. Rex Knight, Pope County resident, opposes casino in Pope County; supports proposed Rule 2 requiring letters of support from current County Judge and Quorum Court; cites passage of local ordinance requiring local option election.

122. Richard Krentz, Pope County resident, supports current draft of Rule 2.

123. Fritz Kronberger, Pope County resident, supports proposed Rule 2 requiring letters of support from current County Judge, Quorum Court and Mayor; cites passage of local ordinance requiring local option election.

124. Beverly Kugler, Pope County resident, supports current draft of Rule 2.

125. Zac Lacy, Pope County resident, supports proposed Rule 2 requiring letters of support from current County Judge, Quorum Court and Mayor; requests that Pope County voters decide issue through local election.

126. James Lanier, Pope County resident, supports proposed Rule 2 requiring letters of support from current County Judge and Mayor; requests ARC require an election in Pope County prior to accepting letters of support from current County Judge and Mayor.

127. Joyce J. Larkin, Pope County resident, supports proposed Rule 2 requiring letters of support from current County Judge, Quorum Court and Mayor for a casino; cites Pope County local ordinance passed by 68% of voters requiring a local election before a casino letter of support is issued by an official.

128. Hugh Laws, Pope County resident, supports proposed Rule 2 requiring letters of support from current County Judge and Mayor; critical of letters of support issued by former Mayor and County Judge; urges adoption of current Rule 2.

129. David Lee, Pope County resident, opposes a casino in Pope County: “last thing we need are more places to gamble.”

130. Betty Long, Pope County resident, supports proposed Rule 2 requiring letters of support from current County Judge and Mayor; points out that Pope County voters passed an ordinance with 68% in favor of requiring an election in Pope County prior to the issuance of a letter of support from a County Judge and Mayor.

131. Carol Lykins, Pope County resident, supports proposed Rule 2 requiring letters of support from current County Judge and Mayor; requests ARC take note of the 68% vote in favor of election prior to issuance of letters of support for a casino.

132. Mark Lykins, Pope County resident, supports proposed Rule 2 requiring letters of support from current County Judge and Mayor; cites Pope County ordinance requiring election prior to issuance of letters of support; opposes casino in Pope County.

133. Ted Mackey, Pope County resident, supports proposed Rule 2 requiring letters of support from current County Judge, Quorum Court and Mayor; cites local option election requirement passed by Pope County voters.

134. Mike McCoy, Pope County resident, supports proposed Rule 2 requiring letters of support from current County Judge and Mayor; opposes a casino in Pope County.

135. Claudia Mendoza, Pope County resident, supports proposed Rule 2 requiring letters of support for a casino from current County Judge and Mayor.

136. Danny Minyard supports proposed version of Rule 2 requiring letters of support from current County Judge and Mayor; cites Pope County voters' passage of local ordinance by 68% majority requiring election before officials issue a letter of support for a casino.

137. Wanda Minyard supports proposed Rule 2 requiring current County Judge and Mayor to sign letters of support; cites Pope County ordinance requiring vote prior to issuance of letters of support.

138. Sandra Mitchell, Pope County resident, supports proposed Rule 2 requiring letters of support from current County Judge and Mayor; cites Pope County ordinance requiring vote prior to issuance of letters of support.

139. B. Rachel Moore supports proposed version of Rule 2 requiring letters of support to be issued by current County Judge and Mayor; cites Pope County voters' passage of local ordinance by 68% majority requiring election before officials issue a letter of support for a casino.

140. David Moore supports proposed Rule 2 requiring letters of support to be issued by current County Judge and Mayor; cites Pope County voters' passage of local ordinance by 68% majority requiring election before officials issue a letter of support for a casino.

141. Tony Moore, Pope County resident, supports proposed Rule 2 requiring current County Judge and Mayor to sign letters of support; requests ARC to consider local ordinance requiring an election before issuing a casino license in Pope County.

142. Ronnie Morris, Pope County resident, supports proposed Rule 2 requiring letters of support be issued by current County Judge and Mayor; requests vote by Pope County pursuant to local ordinance prior to County Judge and Mayor issuing a letter of support.

143. Dr. Kristen Nelson, Pope County resident, supports proposed Rule 2 requiring letters of support from current County Judge, Quorum Court and Mayor.

144. Jane New, Pope County resident, supports proposed Rule 2; requests that Pope County residents have a say in casino decision.

145. Flora Owens, Pope County resident, requests the ARC not give any consideration to former County Judge and Mayor's letters of support for a casino in Pope County.

146. Julie Oxendine, Pope County resident, supports proposed Rule 2 requiring letters from current County Judge, Quorum Court and Mayor.

147. Kyle and Caitlin Pennington, Pope County residents, support proposed Rule 2 requiring letters from current County Judge, Quorum Court and Mayor.

148. Richard Pierce, Pope County resident, supports proposed Rule 2 requiring letters of support from current County Judge and Mayor; opposes a casino in Pope County.

149. Joan Puckett, Pope County resident, supports proposed version of Rule 2 and opposes casino in Pope County.

150. David Rasmusson, Pope County resident, opposes a casino in Pope County; supports proposed Rule 2 requiring letters of support from current County Judge, Quorum Court and Mayor.

151. Cherie Roe, Pope County resident, supports proposed Rule 2 requiring letters of support from current County Judge, Quorum Court and Mayor; cites 68% vote for county ordinance requiring a local election prior to issuance of any letter of support by an elected official.

152. Donna Rowe, Pope County resident, supports proposed Rule 2 requiring letters of support from current County Judge and Mayor.

153. Elona Rowe, Pope County resident, supports proposed Rule 2 requiring letters from current County Judge and Mayor.

154. Janet Rye, Pope County resident, opposes casino in Pope County and refers to Pope County residents voting NO on casino; supports proposed Rule 2 requiring letters of support from current Mayor and County Judge.

155. Jon R. Sanford, Pope County resident, supports proposed Rule 2 that requires letters of support from current County Judge and Mayor prior to issuance of casino license.

156. Josh Sanford, Pope County resident, supports proposed Rule 2 requiring letters of support to be from current Pope County Judge and Russellville Mayor.

157. Judy Scott, Pope County resident, supports proposed Rule 2 requiring letters of support from current County Judge and Mayor; asks for consideration of Pope County ordinance requiring an election before granting a casino license.

158. Matthew Scott, Pope County resident, supports proposed Rule 2 requiring letters of support from current County Judge and Mayor.

159. Donna Smith, Pope County resident, supports proposed Rule 2.

160. Kenneth Startup, Pope County resident, supports proposed Rule 2 requiring letters of support for a casino from current County Judge, Quorum Court and Mayor.

161. Don Stiles, Pope County resident, opposes a casino in Pope County; no comment on proposed Rules.

162. Anne Stiritz, Pope County resident, supports proposed version of Rule 2 for letters of support; asks ARC to consider the Pope County ordinance requiring vote before letters of support are issued.

163. Hans Stiritz, Pope County resident, supports proposed Rule 2 requiring letters of support from current County Judge, Quorum Court and Mayor; points out the following concerns: structure and numbering errors in Rules; merit criteria for selection process is unclear; paragraph 4.170 in Rules is blank.

164. Michael Stiritz, Pope County resident, supports proposed Rule 2 requiring letters of support from current local elected officials.

165. Jamie Sykes, Pope County resident, supports proposed Rule 2 requiring letters of support from current County Judge and Mayor.

166. Pat Taylor supports proposed Rule 2 requiring letters of support from current County Judge and Mayor; requests local election before acceptance of any letters of support from Pope County officials are accepted by ARC.

167. Russell Taylor, Pope County resident, opposes a casino in Pope County; urges ARC to adopt rules to respect voters of Pope County who oppose a casino.

168. Angela Tereza, Pope County resident, supports proposed Rule 2 requiring letters of support from current County Judge and Mayor; points out that Pope County voters passed an ordinance with 68% in favor of requiring an election in Pope County prior to the issuance of letters of support from County Judge and Mayor.

169. Gerald and Janet Thurber, Pope County residents, oppose casino in Pope County; support proposed Rule 2 requiring letters of support from current County Judge and Mayor; cite passage of local ordinance by 68% requiring a local option election.

170. R. Mark Tripp, Pope County resident, supports proposed Rule 2; opposes the use of letters of support from former elected officials; points out that the Pope County Ordinance calling for a local election on the casino issue passed by 68%.

171. Sharon Trusty, Pope County resident, supports proposed Rule 2 requiring letters of support from current County Judge and Mayor; requests that the Commission take note of the Pope County ordinance passed by margin of 68% requiring local election before letters of support can be issued by County Judge and Mayor.

172. James Tucker, Pope County resident, supports proposed Rule 2 requiring letters of support be signed by current County Judge and Mayor.

173. Linda Tucker, Pope County resident, supports proposed Rule 2 requiring letters of support be signed by current County Judge and Mayor; cites local ordinance passed by 68% of Pope County voters requiring a local election prior to the issuance of letters of support from County Judge and Mayor.

174. Warner Gaming, a hospitality and gaming company located in Las Vegas, NV, submitted by Bill Warner, supports proposed Rule 2 requiring letters of support from current County Judge, Quorum Court and Mayor; comments on success in other states when the local community supports the casino proposal.

175. Don and Mildred Washington, Pope County resident, supports proposed Rule 2 requiring letters of support from current County Judge, Quorum Court and Mayor.

176. Susanne Watson, Pope County resident, supports proposed Rule 2 requiring letters of support from current County Judge, Quorum Court and Mayor at the time of

application; points out county ordinance passed with 68% majority requiring a vote before letters of support are issued.

177. Sylvia Watts, Pope County resident, supports proposed Rule 2 requiring letters of support from current County Judge and Mayor; points out that Pope County voters passed an ordinance with 68% in favor of requiring an election in Pope County prior to the issuance of letters of support from County Judge and Mayor.

178. Karen White, Pope County resident, supports proposed Rule 2 requiring letters of support from current County Judge, Quorum Court and Mayor; points out a majority of voters in Pope County voted against a casino.

179. Amanda Whitlow, Pope County resident, supports proposed Rule 2 requiring letters of support from the current County Judge and Mayor.

180. Sandi Whitlow, Pope County resident, no comment on proposed Rules; requests that Pope County be allowed to vote before ARC approves a casino in Pope County; requests ARC to “uphold the right of the current mayor and judge to deny the casino project in Pope County.”

181. Jo Ann Whitney, Pope County resident, supports proposed Rule 2 requiring letters of support from current County Judge, Quorum Court and Mayor

182. Kelly Whitney, Pope County resident, supports proposed Rule 2 requiring letters of support from current County Judge, Quorum Court and Mayor

183. Anne and Harold Williams, Pope County residents, support proposed Rule 2 requiring letters of support from current County Judge and Mayor; opposes a casino in Pope County.

184. Cheryl Wolhart, Pope County resident, supports proposed Rule 2 requiring letters of support from current County Judge, Quorum Court and Mayor; points out that Pope County voters passed an ordinance with 68% in favor of requiring an election in Pope County prior to the issuance of letters of support from County Judge, Quorum Court and Mayor.

185. Frank Wolhart, Pope County resident, supports proposed Rule 2 requiring letters of support from current County Judge, Quorum Court and Mayor; points out that Pope County voters passed an ordinance with 68% in favor of requiring an election in Pope County prior to the issuance of letters of support from County Judge, Quorum Court and Mayor.

186. Jared Wood, Pope County resident, supports proposed Rule 2 requiring letters of support from current County Judge and Mayor; requests ARC honor wishes of Pope County residents and not approve casino license for Pope County without a vote.

187. Renee Wright supports proposed Rule 2 requiring current County Judge and Mayor to sign letters of support; cites Pope County ordinance requiring vote prior to issuance of letters of support.

188. William Young and Deborah Young support proposed version of Rule 2 requiring letters of support to be issued by current County Judge and Mayor; cite Pope County voters' passage of local ordinance by 68% majority requiring election before officials issue a letter of support for a casino.

Section III

189. Joint letter from Hunter Yurachek, Director of Athletics, University of Arkansas; Terry Mohajir, Director of Athletics, Arkansas State University; Chasse Conque, Athletic Director, University of Arkansas at Little Rock; and Melvin Hines, Director of Athletics, University of Arkansas at Pine Bluff. This joint letter addresses the proposed Rules for sports wagering and presents recommended changes / additions to the current proposed Rule 20. The letter states that the goal of the signees “is to ensure that the sports wagering framework adopted by the Commission not only protects fans and safeguards the integrity of the collegiate sporting events that serve as the foundation of lawful sports wagering in Arkansas, but also protects our coaches, staff and student athletes from exploitation, corruption, and improper influence.” The letter provides specific changes to the language of proposed Rules 20.010, 20.120 and 20.121.

190. Keith C. Miller, Professor of Law, Drake University, Des Moines, Iowa; summary of the points and recommendations made by Professor Miller:

1. EXTENSION OF CREDIT BY CASINO TO PLAYER

- Due to concerns about the potential problems created when players are granted credit by casinos, I recommend that the Commission not allow players to take on debt in this manner. After the Commission has had a period of time to observe the operation of the gambling market, it can make a well-informed judgment whether the issuance of casino credit is advisable.

2. LOCATION OF ATMs AND CREDIT CARD MACHINES

- In order to deter players from acting without reflection to withdraw money on their credit card and debit accounts, I recommend that casino licensees not allow ATMs, credit card cash advance machines, or any other device that dispenses money to be located in the gaming areas (as defined) of the licensed property.

3. FUNDING FOR GAMBLING DISORDER RESEARCH, PREVENTION, AND TREATMENT

- Gambling disorders are a tragic and unfortunate by-product of gambling that implicate public health issues. There should be funds dedicated for research, prevention, and treatment of gambling disorders within the state. I recommend that 1% of net gaming revenues (money wagered less winnings paid) be directed to funding of gambling disorders, and that the state Department of Human Services provide and administer the programs suitable for addressing gambling disorders.

4. GAMBLING DISORDERS AND SELF EXCLUSIONS

- One means of addressing gambling disorders, player self-exclusions, should be available for all forms of gambling. The process of self-exclusion should be administered by the state Department of Human Services with funds supplied from those directed to treatment of gambling disorders. I recommend that the Commission establish procedures for casinos to assist in enforcing the self-exclusions and to provide penalties for casinos not using best efforts to do so.

5. CREATION OF A RESOLUTION PROCESS FOR DISPUTES BETWEEN CASINOS AND PLAYERS

- I recommend that the Commission, working with the Legislature, establish an administrative dispute resolution process for disagreements between a casino and a player who believes the casino has wrongly withheld money that is owed to him from gambling activity.

6. ARKANSAS CLEAN INDOOR ACT AND NON-SMOKING

- Due to the overwhelming evidence of the health threats presented by second hand smoke, I recommend that the exemption contained in § 20-27-1805 (9) of the Arkansas Clean Indoor Air Act for current racing franchises not be extended to casinos licensed pursuant to Amendment 100. Smoking should not be allowed on the gaming floors of those casinos.

7. REGULATION OF SPORTS BETTING

- While sports betting is authorized under Amendment 100, I recommend that the Commission undertake a study of the specific and distinct issues this form of betting presents before establishing rules for its regulation. The uncertainty created by actions of the federal government and the host of issues needing attention makes it inadvisable to act without such an evaluation. As part of this study, Arkansas colleges and universities should be contacted for input regarding allowing betting on sports contests involving their teams.

191. Alex Gray, Attorney for Downstream Development Authority, submitted comments on the following Rules.

Rule 4.160 Surveillance Systems – Downstream requests more time for a licensee to develop and obtain approval for surveillance systems in a casino. Downstream suggests that the Commission adopt the minimum control standards contained in 25 CFR 543.21.

Rule 6.050, which applies to records of ownership for corporations, Downstream requests that those requirements apply to other types of entities, such as partnerships and limited liability companies.

Rule 7.010 Transfers of Ownership; Loans – General. Downstream requests that this section be changed to apply only to loans relating to the actual real estate and equipment in the casino, and not to any loan to the casino licensee.

Rule 11.090, Downstream requests permission to use promotional and tournament chips.

Rule 12, Downstream supports use of independent testing laboratories.

Rule 12.200, requiring written list, Downstream requests requirement for written reports be changed to allow electronic reports.

192. Draft Kings, a mobile sportsbook operator with its headquarters in New Jersey, submitted written comments on proposed Rule 20 governing sports wagering. Draft Kings advocates allowing mobile sports wagering where patrons can use mobile devices to place wagers on sporting events. The proposed Rules limit sports wagering to wagering on the premises of the casino, and prohibit the placing of bets off of the casino premises. Draft Kings cites statistics that show prohibiting mobile wagering on sporting events severely impacts the gross wagering totals on sports wagering. Draft Kings argues that prohibiting the use of mobile wagering on sporting events allows illegal betting to flourish.

193. Fanduel submitted a comment signed by Andrew Winchell, Director of Government Affairs. Fanduel advocates allowing the use of mobile devices for placing sports wagers off of the casino premises and allowing online wagering. Fanduel states that healthy competition in the marketplace is the strongest driver of innovation so that consumers will have more choices and illegal sites will not be able to compete.

194. Peter Wolff, Technical Compliance Manager, Gaming Laboratories International, Lakewood, New Jersey. GLI is a gaming testing lab and industry consultant used by the ARC. GLI offers comments on Rules 1, 3, 4, 5, 6, 12 and 20. Rule 3 comments raise issues about the rules that specifically refer to GLI's testing lab services provided to the Commission. Rule 4 comments question the requirements for the locations of hosting centers. Rule 5 comments refer

to Geolocation Services and standards for those services. Rule 6 comments relate to online slot metering systems. Rule 12 comments relate to technical standards for gaming devices. Rule 20 comments relate to whether call centers must be located in Arkansas, or other approved locations; reserve requirements; off-premises wagers; and patron wagering accounts for sports wagering.

Complete copies of the public comments are attached hereto.