



Executive Secretary
Nevada Gaming Commission
PO Box 8003
Carson City, NV 89702-8003

RE: Public Comments Concerning Proposed Amendments to NGC Reg 4A (Charitable Lotteries)

I am the current President of Nevada Waterfowl Association (“NWA”), a 501©(3) qualified organization that has been conducting charitable lotteries pursuant to existing Regulation 4A since the enactment of Chapter 462 in 1991. Prior to my retirement, I served as the Director of the Nevada Department of Wildlife, and I have spent my entire adult life working on conservation issues throughout Nevada. I am writing this to provide public comments concerning the proposed amendments to Regulation 4A that are set for consideration by the Nevada Gaming Commission at its September 26, 2019 meeting.

I apologize for not submitting these comments to the Gaming Control Board when it considered this matter at its August 7th workshop. But this matter has just recently come to my attention. It appears the proposed amendments to Regulation 4A may have the unintended consequences of prohibiting minors from participating in charitable lotteries; i.e. raffles, as has been the custom and practice of many non-profit organizations, including NWA. In fact, NWA actively seeks to get kids involved in our conservation efforts, which necessarily includes fundraising.

Proposed Regulation 4A0.40 would prohibit NWA, as a qualified organization, from allowing: “A person under the age of 18 from entering, purchasing tickets for entry into, collecting winnings from, or participating in the administration of, whether personally or through an agent, any charitable lottery.”

I do not believe there is any such statutory prohibition in Chapter 462 or AB117, which merged “Charitable Games” in to “Charitable Lotteries.” Ever since legalization of Charitable Lotteries in 1991, many conservation organizations such as NWA have conducted special raffles for kids under 18 as part of their fundraising events. In fact, it is part of NWA’s mission statement to encourage young people to get involved in conservation efforts throughout the state. NWA has always been a family-oriented conservation organization and we do everything we can to include kids in our events.

For example, at a typical NWA dinner we sell either adult or youth tickets. Adult tickets go into one raffle drum for the main door prize(s), while children's tickets go into a separate drum for a special drawing just for the kids. Kids' prizes include outdoor sports gear and opportunities, and the goal is to encourage our youth to explore the outdoors and be active. In turn, such experiences create interest in and foster respect for the unique habitats of our state. I suspect many other conservation groups do the same at their events. That would now be illegal under the proposed Reg. 4A.040.

During the dinner, we also conduct a general raffle as well as various "special" raffles and games, and we allow all attendees to participate in those raffles and games. Our "Spin the Wheel" game is fun for the kids because they are guaranteed to win something with each spin of the wheel, including the opportunity to win whatever the grand prize is that year. This game keeps the kids engaged and is a key part of our event.

We conduct several other similar games in which players can win tickets for special drawings. I believe that most conservation organizations that conduct Charitable Lotteries also conduct these types of games at their fundraising events and allow children to participate. All of those games would be illegal under Reg. 4A.040 if individuals under 21 participated.

When NWA conducts our fundraiser dinners, we often have college students and kids under 18 help run the event, and many of them receive volunteer credit for their participation. I suspect most organizations like NWA also have youth these ages involved in their events. All that appears to be illegal under proposed Reg. 4A.040.

If proposed Reg. 4A.040 is enacted, NWA would have to exclude children under 18 from attending our events. That would effectively make it impossible for us to accomplish our mission statement of getting young people involved with the conservation efforts we support. Enactment of proposed Reg 4A.040 would have the types of unintended consequences I have described and would impact many conservation groups besides NWA. I urge the Commission to simply delete section 1(b) of proposed Reg. 4A.040.

I also request that a representative of NWA be allowed to address the Commission concerning this matter at the September 26th meeting via video conference at the Gaming Control Board Carson City office.

Thank you,



William A. Molini
President, Nevada Waterfowl Association