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LAW THE STATE BAR OF CALIFORNIA
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August 23, 2013

National Indian Gaming Commission
1441 L Street NW, Suite 9100
Washington, DC 20005

Re: **Electronic One Touch Bingo System**
Proposed Reinterpretation of Class II and Class III Games

Dear Sir or Madam:

I write on behalf of Artichoke Joe's, a state licensed cardroom in San Bruno, California in response to the request for public comment on the proposed change in rules regarding classification of Class II and Class III games.

We do not think the proposed rules are consistent with the Indian Gaming Regulatory Act. Section 4 (7)(B) of IGRA (25 USC §2703) provides that class II games do not include, "electronic or electromechanical facsimiles of any game of chance or slot machines of any kind." The phrase "of any kind" is broad and inclusive. Congress was being very clear. The term "slot machines" is to be interpreted broadly. No machine that could be classified as a slot machine is be classified as a class II game.

Current regulations violate that statute. At least some machines classified as class II bingo machines look and operate like slot machines and offer the same gaming experience. The proposed rules would be even worse. The gaming experience, operated with one touch bingo system, will be indistinguishable from that of slot machines. You put in your money, spin the reels and see what you win. That's a slot machine, not bingo.

Sincerely,


Alan Titus