



**A Submission to the Mayor of Surrey and
Surrey City Council by the
NoCasinoSurrey Coalition**

With reference to a proposal by
BCLC and Gateway Entertainment and Casino Ltd.

A Division of Catalyst, Toronto, Canada
To license and operate a casino in South Surrey
File # 7912-0299-00 & 7909-0169-00

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1. About Us

We are NoCasinoSurrey:

- NoCasinoSurrey represents various groups of South Surrey residents including:
 - Over 5306 South Surrey residents who have signed our Surveys and who say NO to the proposed South Surrey Entertainment Complex!
 - **1077** Facebook friends who Liked our Facebook page and who say NO to the proposed Casino versus only **132** Likes for Gateway's Facebook page!
 - 281 people who signed our on-line petition and wrote emails to council
 - 46 leaders of the community who have added their name to our document
 - 31 Churches who support our position and do not want this casino
 - Dozens of letter writers who wrote into the local Newspapers to SAY NO to a new South Surrey Casino
 - Many local business leaders who are concerned about losing their staff or seeing the jobs they provide lost because of casino competition
- NoCasinoSurrey is a coalition of concerned residents and businesses who oppose the expansion of casino gambling to South Surrey as proposed by BCLC and Gateway Entertainment & Casinos Ltd.
- NoCasinoSurrey is collectively the largest group representing parties who are against the casino and who would be negatively impacted by the inclusion of the casino in the development application. This includes residents and business people of Surrey and also White Rock
- NoCasinoSurrey workers are volunteers. NoCasinoSurrey has no paid staff
- NoCasinoSurrey does not pay advocates or lobbyists to plead our case
- NoCasinoSurrey is managed by a leadership council that meets regularly
- NoCasinoSurrey costs are funded 100% by donations from the community
- NoCasinoSurrey supporters are proud of our city!



1.1 Contact Us

NoCasinoSurrey can be contacted using one of the following methods:

Our Email address: NoCasinoSurrey@telus.net
Our Website at: www.NoCasinoSurrey.org
On Facebook at: www.facebook.com/NoCasinoInSouthSurrey
Or Tweet us at: @NoCasinoSurrey

1.2 About the Authors

This submission represents hundreds of hours of work on behalf of many members of NoCasinoSurrey, the South Surrey Rate Payers Association, and the many residents and businesses of South Surrey and White Rock.

NoCasinoSurrey wishes to thank all of its dedicated volunteers for their extreme dedication to help work to keep the Semiahmoo Peninsular Casino free. We believe that Casinos are not compatible with raising our families, enjoying our way of life, or for fostering the kind of family friendly development and growth that we hope to see in South Surrey's future with the help and guidance of Surrey City Council and the Honourable Mayor Dianne Watts.

The main contributors responsible for the planning, writing, and editing of this submission into City Council on behalf of NoCasinoSurrey were:

- Scott Kristjanson (Editor)
- Karen Pohlmann (Editor)
- Susan Lindenberger
- Margaret Wood
- Don Murray

NoCasinoSurrey thanks these individuals for their extreme dedications and hard work and for doing such a great job creating this document under extreme deadlines requiring considerable sacrifice of their time and energy. Thanks team! You are all awesome!

We wish to thank especially our President of the South Surrey Rate Payers Association, Mr. Terry McNeice, who spearheaded our organization and set us on the correct path to fight the proposed South Surrey Casino. Terry has spent an enormous number hours leading the charge, while always keeping a cool head and an eye on the prize – No Casino in South Surrey. Thanks Terry! You are awesome too!

1.3 Community Leaders Opposed to a Casino in South Surrey

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Pastor Rico Galindez, Cedar Grove Baptist Church, Surrey
Pastor Thomas Glatts, Seventh Day Adventist Church, Surrey
Pastor Darren Hammermeister, Pastor, New Life Baptist Church, Surrey
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Pastor Walter Johanson, retired minister, Lutheran Church, Surrey
Pastor Ross Johnston, Cedar Grove Baptist Church, Surrey
Pastor Mika Kostamo, Cedar Grove Baptist Church, Surrey
The Rev. Mike Schroeder, Life Church, White Rock
The Rev. Ken Strom, White Rock Community Church, White Rock
The Rev. Gerry Teithrop, Peace Portal Alliance Church, Surrey
Father John Tritschler, Good Shepherd Catholic Church, Surrey
Pastor Phil Wagler, Lead Pastor, Gracepoint Community Church, Surrey
Pastor Tom Yancy, Foursquare Gospel Church, Surrey

2. Introduction

Gateway Casinos & Entertainment Ltd (Gateway) and British Columbia Lottery Corporation (BCLC) have applied to Surrey City Council for approval to relocate the Newton casino license to a proposed casino complex in South Surrey on 168th street, between 10th and 12th avenues. NoCasinoSurrey notes that Surrey City Council has no responsibility or obligation to relocate this license.

This document outlines the reasons why a casino at the proposed location is completely inappropriate and why the license to operate a Casino at this location should be denied.

3. Executive Summary

NoCasinoSurrey and the residents of South Surrey respectfully advise, based on the best information available, that the negative impacts of a casino in South Surrey are greater than the projected benefits and thus the application should be denied for the reasons listed below and explored more deeply throughout this submission to Council.

NoCasinoSurrey concludes that the application for a casino in this location, irrespective of the 99 Corridor Plan, is of a scale and character that is not consistent with normal and acceptable business activity, nor is it consistent with the wishes of the majority of Surrey residents, and thus this proposal is inappropriate for this location.

The proposed South Surrey Casino is not consistent with healthy economic development planning and the social impacts of expanded gambling are not in line with our collective civic values.

3.1 Urban Planning

- Council has an obligation and responsibility to maintain its own vision “to support a high quality of life for its residents, workforce and visitors through sustainable development that carefully integrates economic, environmental and social/cultural interests.”
- It would be a backward step for our current and future civic values if Council approves the casino application, as it would mean a return to Surrey’s negative reputation and social problems that Council is working so hard to eliminate.

3.2 Economic Promises and Realities

- The Gateway casino submissions do not address, economically, the social costs.
- The inclusion of all costs, including social costs and diversion of revenues from local business would result in an annual net loss of GDP to the economy of the City of Surrey.

3.3 Negative Social Impacts

- Safeguards put in place by BCLC and Gateway to reduce the social impacts of gambling have been shown to be ineffective in stopping addiction as well as money laundering, loan-sharking, and other criminal activities.
- For every dollar received from gambling proceeds, it costs the city and community three dollars in social costs. The social costs associated with gambling exceed any benefits!
- The Socio-Economic impact of gambling is ignored by the applicants.
- Surrey, mainly South Surrey, will be burdened with a disproportionately high share of the negative impacts of a casino and a disproportionately small share of any benefits.

3.4 Location and Land Use

- This development will be overly disruptive to neighbouring residential and rural areas, which will result in a community that is less safe for families, contribute to a lower quality of life for residents and hurt local businesses.
- BCLC’s HLT Market Analysis indicates that another casino, if it were to be built at all, would best be located considerably north and west of the current site.

3.5 Vision and Values

- This development is incompatible with community values and Surrey Council’s vision of a high quality of life that integrates economic, environmental and social/cultural interests.
- The proposed casino complex is too massive and is inappropriate to co-exist with the normal and acceptable business activity that Council has planned for this location.

4. All that Glitters is not Gold

This chapter contains the main body of the NoCasinoSurrey submission to City Council.

4.1 Urban Planning

Visualize entering Canada through the Peace Arch Crossing, being warmly greeted, “Welcome to Surrey,” and 10 seconds later a tall sign heralds “CASINO”.

The Mayor and Council are facing an important decision: determining whether the proposed casino would fit the image and values Surrey projects, whether a casino would help grow the city in the best direction:

- What kind of City does Surrey want to be?
- Will residents share equally in the prosperity?
- Will families feel comfortable living here?
- Will visitors be impressed by their first sight of Canada?

Foremost in our minds is our City’s development vision “*to support a high quality of life for its residents, workforce and visitors through sustainable development that carefully integrates economic, environmental and social/cultural values.*”

Along with development, we are proud to witness Surrey shedding its previous unsavoury reputation in favour of a reputation for which we can all be proud. There is still work to be done, but a casino brings back many of the influences that the public and Council have so laboriously worked to eliminate.

NoCasinoSurrey asserts that Surrey will continue to grow rapidly even if the casino license application by Gateway Casinos is rejected, but it will grow in a more healthy direction. A direction that promotes *opportunity for all, safety and relatively little crime, family values, cultural diversity, parks green spaces, environmental integrity, local food production, and a magnet for good investment.*

4.2 Economic Promises and Realities

Studies and expert testimony tell us that when all costs are included, the socio-economics of casino gambling to a municipality are decidedly negative.

Proponents consistently overestimate the benefits and underestimate and/or exclude costs. Construction jobs, ongoing employment and the purchase of supplies and services are stated as if they would all accrue to Surrey, when in reality they will be spread across the GVRD and beyond.

None of the applicants’ submissions address the social cost of treating problem gamblers, their families and other victims. None of the applicants’ submissions address the fact that stated policies, rules and procedures fail to protect us from the criminal underbelly of casino gambling and the attendant costs to society.

A study by Grinols & Mustard [26] identifies external factors that are excluded in gambling proposals. This was a comparative study of counties with and without a casino. The economic impact of casino gambling is that for every \$1 of benefit, there is a cost of \$3 to the overall economy.

Overlooked issues include increased costs to the justice system, social welfare, health system, charitable groups, food banks and shelters, insurers, and costs to business through theft, embezzlement and absenteeism. Virtually no one is untouched by these costs or the high cost to our society.

Our quality of life and our economy would benefit by avoiding these costs. At present, casino and other gambling activities are being subsidized from other sources.

Revenues from casino gambling in B.C. are distributed as follows:

- 58% to the Province with an undetermined amount returned to the City via grants and services
- 34% to Gateway, portions going towards amortization of development costs, operating costs and profit to Catalyst of Toronto, Ontario.
- 8% to the City of Surrey from the Province.

The arithmetic shows that the amount of money that flows out of the City of Surrey is much greater than the amount of money that ever returns. This is reflected in the Social-Economic Impact study conducted by Blue Thorn in 2007:

Whether these venues will continue to provide a net monetary benefit to these municipalities is more debatable, and very much dependent on patron origin and the future size and distribution of gaming revenues. For the most part, there has been very little repatriation of gambling dollars from out-of-province venues. Rather, the main impact of these new venues has been local repatriation of gambling dollars from neighbouring Lower Mainland venues.

Socioeconomic Impact, Blue Thorn, 2007, See Ref [3]

Based on this impact study, the only way that the proposed South Surrey Casino can be made economically viable for Surrey is if large sums of gambling money are drawn from other jurisdictions outside Surrey boundaries. Given the current market saturation and competition from other communities, this is unlikely to happen.

4.3 Diversion of Revenues and Cross Impacts on other Businesses

Growth may mask, but not eliminate, the diversion of revenues from businesses across Surrey. Revenues that *were previously spent throughout Surrey* will be drawn off by the casino. The following is a quote from the Social-Economic Impact Study [3] which was produced for the BC Government in 2007:

*(Garrett 2003[50]; Grinols 1994[51]; 1996[53]; 2004[52]) have pointed out that gambling often **does not create new jobs. Existing jobs in retail, entertainment and the food service sectors are often displaced or “cannibalized” by the gambling industry** as spending patterns shift to casino gambling. Furthermore, these new casino jobs are typically low skilled and low paid compared to some of the jobs they are displacing (McMillen 2000[54]; Marshall 2001[55]).*

The ability for Gateway to cross-subsidize the restaurant and convention businesses from their profits in the casino, creates a distortion in the free marketplace. It especially disadvantages small business.

Offering low cost meals and beverages to lure gamblers, unfairly competes against area restaurants, pubs and lounges. Should Gateway choose to underbid the Sheraton Guildford

(which has similar convention space), the Sheraton would have difficulty retaining business and would cut back on employment.

The 800-seat theatre, which will also accept private bookings, will compete for bookings and entertainment dollars with:

- the Bell Performing Arts Theatre (1062 seats)
- the Surrey Arts Centre (402 seats)
- the Chandos Patterson Theatre (1500 seats)
- the future Surrey Performing Arts Theatre in city centre (1600 seats)
- numerous other smaller venues in the region

It is estimated that patrons spend on average \$150 on gambling and \$20 [57] for food and beverages per visit. This \$170 per visit is a direct diversion from other businesses of all types, but in particular businesses in close proximity to the casino site. Most of this spending is, in effect, siphoned out of Surrey; a small portion being retained by people and businesses that happen to be employed or have service contracts with the casino.

4.4 Can Surrey rely on this extremely unstable industry?

Since 1992, there have been 8 casino closures in Canada. In recent years in the lower mainland, two casinos licenses have been moved out of a municipality to another municipality plus other shuffling of licenses has occurred. Each casino bankruptcy/receivership represents millions in losses to employees, suppliers and all three levels of government. In 2010, Gateway Casinos declared bankruptcy with over \$1 Billion in debt. It was then bought up by the Catalyst Corporation of Toronto.

50 major destination casinos across America are in bankruptcy or receivership, awash with billions of dollars of debt.

Sean Bickerton, co-founder of the Vancouver not Vegas Coalition, March 2011

The message is clear that the Casino industry is not a stable and dependable industry on which any city should base its economic future. StatsCan has reported that for the last two years, the growth in the Gambling industry in Canada has stopped. To say YES to Gateway's proposed South Surrey Casino is to risk Surrey's economic future on a saturated market with no growth potential. In fact, insiders within the industry tell NoCasinoSurrey that there will be layoffs at Cascades casino if the proposed South Surrey Casino is built.

Similar stories of financial hardships within the Casino industry abound. Paragon's River Cree Casino in downtown Edmonton recently defaulted on a \$111 million loan forcing re-negotiation of agreements between the Government, the Band, and Paragon to regain financing to continue business.

The notion that the South Surrey Complex would attract to Surrey a significant portion of revenues from the USA and other Canadian jurisdictions is purely speculative. It has been shown that there is no market in the South Surrey or Blaine USA regions for a large convention center. As an example, the convention center in Blaine USA recently closed due to lack of business.

Semiahmoo Resort Co. has announced the Dec. 1 shutdown of the Semiahmoo Hotel putting 200 people out of work. ... the hotel has been unable to survive the collapse of its conference booking business beginning with the recession in 2008. (Bellingham Herald, Oct. 30, 2012)

Given the concentration of gambling in the South Surrey – Langley corridor and large overlap of catchments, a casino failure in this area is likely.

4.5 Surrey's Sustainability Charter

The City's Sustainability Charter defines sustainability in the Surrey context to be: *the principle of meeting the needs of the present generation in terms of the environment, the economy and social systems while promoting a high quality of life, but without compromising the ability of future generations to meet their own needs.*

Analysis reveals the proposed casino will be an ongoing economic drain on the City of Surrey, its residents and other businesses.

4.6 Negative Social Impacts of Gambling

4.6.1 A Quote from Warren Buffet on Social Impact of Casinos

Addictions produce crime. If you have a large group of people who are addicted to drugs, you'll have more crime. If you have a large group of people who are addicted to gambling, you'll have more crime. People get into impossible situations when they get addicted to something like that. And some people will opt for crime, some will opt for bankruptcy, some may commit suicide.

I do not think that the state ought to be in the position of selling the needles. We're going to have drug addicts in this country, but I don't think the state ought to get in the business where it hopes there's more drug addicts and starts selling needles. And we're going to have gambling addicts in this country but I don't think that the state ought to become the sponsor of spreading that addiction.

Warren Buffett, Gambling with the Good Life [49]

4.6.2 Gambling Addictions

Gateway and BCLC trivialize the degree to which gambling constitutes a major harm to our social structure. "Gaming" is referred to as "entertainment". For those who become addicted to gambling, there is nothing entertaining about it. In spite of GameSense, Responsible Gambling Ads, Appropriate Response Training, Youth Gambling Prevention and Voluntary Self-Exclusion, gambling addiction is a huge problem in B.C. (BCLC's Socio-economic Impact Analysis [30], p22-28).

While we tend to think of addiction in terms of illicit drugs, addiction to alcohol and gambling in BC are far more prevalent.

BC Medical Association President Dr. Bill Mackie (Ref [40], page 5)

In BC, 128,000 (20,000 in Surrey) have moderate gambling problems, and 31,000 (approx. 5,000 in Surrey) have severe gambling problems. This compares with 33,000 British Columbians with a serious dependence on illicit drugs. BCLC revenues do not cover treatment costs; municipalities and health services pick up the overload.

4.6.2.1 Warren Buffet on Gambling Addictions and Governments

A quote from Warren Buffet on governments that use Casinos as a means to raise funds and lower taxes from [56]:

To quite an extent, gambling is a tax on ignorance. I find it socially revolting when the government preys on the ignorance of its citizenry. When the government makes it easy for people to take their Social Security checks and pull [slot machine] handles, it relieves taxes on those who don't fall for it. It's not government at its best.

Warren Buffet, 2007

4.6.2.2 Casinos Pay Lip-Service to Stopping Gambling Addiction

Casinos pay lip service to helping addicts overcome their addiction, but as stated in one Casino employee's view, this seldom happens in practice:

At what point does gambling in the casino become an addiction as opposed to being mere entertainment? Is a poker player who spends 8, 10, 12, maybe even 14 or more hours a day on the table considered an addict?

Then there is the single mother who is only at the casino once or twice a week. She may only gamble for an hour. But she is gambling with her welfare cheque...

What about the senior citizen who comes in every day . . . They spend most of their time chatting with the staff. The casino has become a second family for them . . .

Even though all casino staff participate in training to look for signs of compulsive gambling, there is nothing they can do to stop the gambling. The dealer can talk to a supervisor on their break, and a supervisor can notify the floor manager, but unless they cause a disturbance, "it's their money" . . . let the money keep coming in!

"Casino employee's views", The Vancouver Observer, 4/13/11

4.6.2.3 The Hidden Victims of Gambling Addiction

Addiction rates are 24% for gamblers who play Slot Machines. This highlights why casinos prefer to reserve most of the gaming floor space for slot machines rather than other forms of gambling. Statistics Canada (2003) reports that in general across all forms of gambling, 5% of gamblers become addicted. The number of victims is much greater since for every gambling addict, 10 to 17 other people are adversely affected [67]. Much of this suffering goes unreported as indicated by Dr. Bill Mackie below:

The majority of suffering occurs in people's homes, at school, and at work across all parts of our province

Dr. Bill Mackie, President of the BC Medical Association, Stepping Forward [40], p.7

4.6.2.4 Who are the Problem Gamblers?

Problem gamblers are more likely to be male, relatively young and have less than post-secondary education. Other groups over-represented in problem gambling statistics are seniors, Aboriginal peoples and those of a low socio-economic status. They tend to be persons with financial problems and mistaken beliefs about the odds of winning. A family history of gambling and/or other addictions and mental health problems tend to increase problem gambling.

The Responsible Gambling Council of Ontario, in January 2007, conducted an electronic survey of Ontario youth 15 to 17 years of age.

We shouldn't be surprised that young people are gambling. They are growing up with more exposure to gambling than their parents and a steady diet of media advertising promoting gambling as FUN! – advertising paid for by your tax dollars into BCLC. Culturally we have come to accept gambling as a legitimate source of revenue both for non-profit organizations and government as a source of harmless entertainment. In this context, it is easy to forget that some people develop problems in their lives as a result of gambling activities.

(United Church Mandate Magazine, November 2009) [48]

4.6.2.5 The Issues in a Canadian Context

Examining the issues in a Canadian context, 36% of gambling revenue is derived from moderate to severe problem gamblers ([12], Toronto Health Report [46], p.16). The current model of government-sponsored gambling takes advantage of those with gambling addictions.

Gambling addiction is encouraged by features offered by the casinos. If gambling is truly entertainment, then why does BCLC not follow the recommendations of the Canada Safety Council whose report [47] recommends the following changes to gambling in order to maximize public health and minimize risk of addiction? The report recommends:

- Increase the win ratio of slot machines
- Regulate casino hours as is common with liquor licenses from 2pm until 1am
- Strictly enforce licensing rules regarding under age or voluntarily excluded gamblers and suspend licenses of Casinos found to be in violation
- Suspend licenses when there is recurring evidence of money-laundering, loan sharking or extortion in the casino
- Legislate that casinos must have plainly visible clocks and uncovered windows so that gamblers are aware of the time of day

4.6.2.6 Seniors are Vulnerable to Gambling Addictions

It is known that the two most vulnerable demographic groups, which are most vulnerable to gambling addictions, are Senior Citizens and young people. Senior citizens are known to be at over triple the risk of becoming addicted than the general population. The rate of gambling addiction is 18% for seniors [61] who gamble in a casino, compared to only 5% for the general populations.

One of NoCasinoSurrey's concerns with the chosen location of the proposed South Surrey Casino is that it appears to be targeting the vulnerable: the senior citizens of South Surrey and White Rock.

4.6.2.7 Casino Location and its Impact on Gambling Addiction

The availability of casinos is associated with higher rates of problem gambling. (Toronto Board of Health[46], footnote #25) Of 33 studies looking at gambling rates before and after introduction of casinos, the majority found an associated increase in problem gambling and/or social impacts. (Toronto Board of Health[46], footnote # 29)

Every study shows this: The closer you locate a casino to a population, the more problem gamblers you will have.

Dr. Robert Goodman, Ford Foundation report [41]

Gamblers tend to gamble close to home, within 20 kms [42] page 10). Rates of problem gambling increase the closer the casino is located and gambling addiction rates double when Casinos are located within an 8 km radius. In spite of proclaiming Gateway's latest as a "destination" casino, most of the patrons will be local. Few will be from the USA. Therefore the communities of South Surrey and White Rock will bear the brunt of the social, economic, and mental health ills.

BCLC is eager to recruit new gamblers, who are "under-serviced" in our area (BCLC SocioEconomic Report term, pp. 1, 4 [30]).

Dr. John Blatherwick, B.C.'s former Chief Medical Health Officer, says, "**There are already more than enough casinos in the Lower Mainland**, so to attract more into this one centre (Edgewater), new recruits are needed" [60].

4.6.2.8 Prevention and Treatment become part of the problem

If you have ever known an addict, you will know that most are in denial and few seek treatment. Problem gamblers only seek treatment when they are already in trouble and become desperate. Of those who seek treatment, about one third will not recover and will spiral into bankruptcy. A study conducted in 2010 confirms that promoting responsible gambling actually desensitizes the public and promotes gambling as a normal entertainment activity [38].

This is especially an area of concern since BCLC is allowed to speak and distribute its "Responsible Gambling" and "Game Sense" material in public schools, which basically tells students that gambling is OK and creates a future pool of gamblers and problem gamblers for casinos and BCLC. The BCLC website does not indicate how much they spend on these programs. As shown in [38], this desensitizes students to the issues surrounding gambling and makes them more likely to become problem gamblers in the future.

4.6.2.9 The Cost of Treatment for Gambling Addiction

The price of treating addiction costs every man, woman, and child in BC an estimated \$1,700 per year.

In 2002, the estimated cost of treating addictions in B.C. was more than \$6 billion according to Dr. Lu, the Director for the Burnaby Centre for Mental Health and Addiction [40]. This includes alcohol, gambling, and tobacco and other addictions.

4.6.2.10 Lack of Enforcement of GameSense Self-Exclusion List

Joyce May Ross sued BCLC, Fraser Downs and Gateway for allowing her **to continue gambling, even after she had put herself on the vaunted GameSense Self-Exclusion List**. For three years after placing herself on a list she claims she was permitted to gamble at various Lower Mainland casinos, maxing out her credit cards, spending almost every penny of disposable income and borrowing money from family and friends, to whom she lied about her habit. She testified that she even called BCLC to ask that her picture and self-exclusion order be re-circulated, but with no action taken by BCLC to enforce its own rules [39].

While most children in America are happily dreaming about the toys they want or the family vacation they'll take, the children of an addicted gambler hope for things much more basic. A Christmas tree is not an option when you face the threat of eviction. A big family dinner is impossible when there is no money for food because someone in the family gambled it away. The children of gambling addicts hope for adequate food, clothing, heat, light, a safe and unthreatened home, Mom and Dad to stop fighting. They wish for reprieve from life with an addicted gambler.

Annie Mueller, December 2007

I've seen the worst side of gambling and its effects on individuals and society in general, including murders, suicides, extortions, and a lot more. In one of those cases that you never forget, a man lost hundreds of thousands of dollars over 24 hours in a Burnaby casino. He went home, murdered his wife and two small children, spread gasoline around his East Vancouver house, then struck a match, blowing the house off its foundations and killing himself in the process. Once you've walked into a scene like that, you tend to view those BC Lottery ads showing smiling people having a wonderful time at the Blackjack tables just a little bit differently than most people.

*Bob Cooper, retired Vancouver police officer
From VancouverNotVegas*

In counting the social costs of problem gambling, we must take into consideration the partners, parents, children and friends who are the other victims of the gambler. Their frustration, anger, grief, fears and sense of helplessness is incalculable. They are truly “collateral damage”, yet their experiences and feelings permeate our whole society – the way alcoholism does. “Responsible Gambling,” is meaningless to gambling addicts and their inner circle. Weighing human tragedy on a scale of profit vs. costs is a grisly prospect.

4.6.3 Conflict of Interest

4.6.3.1 GameSense Enforcement

It is clear that there is a conflict of interest between the various roles of BCLC and the operation of Casinos. BCLC receives the majority of proceeds from gambling yet it is also responsible for controlling which locations are selected for proposed casinos and responsible for enforcing GameSense voluntary exclusion programs at local casinos. Since problem gamblers represent a large portion of gambling proceeds, the more problem gamblers that can be created, the more money BCLC makes and the larger the executive bonuses. Where large sums of money are involved, self-regulation seldom stands a chance.

4.6.3.2 Money Laundering

It is no secret that Money Laundering is taking place in all of our casinos and elsewhere. The Provincial Government, by failing to provide enough resources to combat it, leaves itself open to charges of Money Laundering and by taking a cut of the casinos' income, is in conflict of interest and leaves itself open to charges of receiving the Proceeds of Crime. At the same time, these statements hold true for any municipality that participates in the Casino industry.

4.6.3.3 Gaming License Applications Lack Oversight

The Gaming Control Act [62] states “that adequate community input has been sought and considered”, however a conflict of interest exists in the law in that the only entity that must be convinced of this is BCLC itself. There is no accountability to the public to ensure that this indeed has taken place.

4.6.4 Casinos and Crime

“For the B.C. Hells Angels, the favourite businesses are drugs, prostitution and money laundering.” (CBC News. August 19, 2011)

4.6.4.1 BCLC’s Lack Enforcement of Their Own Rules

BCLC, in its *Socio-Economic Impact Analysis*, suggests that their security and reporting measures in casinos are more than ample to prevent money-laundering and loan-sharking (pp 14-19).

CBC reported in January 2011 that **“millions of dollars flowed through two B. C. casinos in 2010 in what the RCMP believes may have been a sophisticated scheme to launder money from the drug trade. . .”** (CBC News, January 4, 2011). Over a period of three months, staff at two casinos reported a total of \$8 million in ninety major cash transactions, an average of one a day.

A man entered Starlight Casino carrying chips worth \$1.2 million and had casino staff convert the chips to cash. The man said he was about to catch a plane and needed a letter stating the cash was a casino payout. He was given that letter. In a report to BCLC, the casino characterized this as only “unusual activity.”

A few days later, a man entered River Rock Casino and bought chips with \$460,000 in \$20 bills. The casino reported that “none of [the man’s] actions are suspicious.”

RCMP became aware of the “unusual” activities after the fact. Insp. Barry Baxter, from the Integrated Proceeds of Crime Section, said, "The casino industry in general was targeted . . . for what may well be some very sophisticated money-laundering activities by organized crime." He expressed concern that criminals try to hide, or “launder”, illegal cash at casinos, which generate a large cash flow.

The Financial Transactions and Reports Analysis Centre of Canada (FINTRAC) [64], a federal money-laundering watchdog, reported that **suspicious transactions at casinos in B. C. tripled in 2010**. Casinos are the third most common institution used for money laundering, after financial and money service businesses. (FINTRAC, *Vancouver Observer*, February 16, 2011) **BCLC was fined \$670,000** by FINTRAC for one thousand violations of the Federal Proceeds of Crime and Terrorist Financing Act.

4.6.4.2 Loan-Sharking

Loan-sharking is a criminally indictable offense in Canada. Casinos are required to expel anyone they suspect of conducting illegal acts on their premises. Gamblers rarely file complaints against casinos and casinos profit from gamblers having access to more funds for gambling.

Loan sharks usually operate outside the view of casino operators, typically in washrooms, smoking lounges, and parking lots. This provides easy access to cash, and provides deniability on the part of casino management.

However, in 2011, CBC News reported that a casino worker alleged that loan sharks are operating inside the Edgewater Casino and that management and BCLC are doing little to stop it. The worker, speaking anonymously for fear of his job and personal safety, claimed the loan-sharks are known to all the players, and if their presence is reported to a supervisor or floor manager, it seems to go no higher [35].

Two of the required reports from Edgewater Casino on suspicious activity failed to initiate serious action. One admitted that a woman's activities were "difficult to prove conclusively." Another in 2011 stated that the suspect "has a long history of activity consistent with loan sharking and has been barred. . . . Players have been observed to call him on his cellular phone while they are both at the same table . . . [then] observed in a hand-to-hand exchange in the smoking patio or they both enter the washroom." (Ibid)

Two prominent loan sharks, both with links to Lower Mainland casinos, were murdered between 2006 and 2009. Lily Li was abducted as she left her "shift" as a loan shark at the River Rock Casino; her body was found buried on Jericho Beach. Betty Yan was found murdered in her vehicle in Richmond [37]. Both Lily and Betty had children in Vancouver area schools.

The Vancouver Sun, 10/29/09; CBC News, 4/16/09

4.6.4.3 Money Laundering

Each year, organized crime generates \$4 billion in dirty drug money from the export of BC Marijuana alone. Money laundering turns DIRTY drug money into CLEAN untaxed money in the local economy

The effect of money laundering, both global and local, is staggering in social, economic and security terms. Depending who you ask, globally dirty money is anywhere from \$500 billion to \$1 trillion every year.

Where does Dirty money come from? Drug traffickers, loan sharks, embezzlers, mobsters, terrorists, con- artists and the good-looking, well-dressed couple who live down your street.

Where does Money Laundering take place? Casinos, financial institutions, restaurants, or brokerage firms; any place that deals in so much money that it's easy for the dirty stuff to blend in. Or the launderers may use small, cash-intensive businesses like bars, strip clubs or check-cashing stores.

Why the need to launder? Using dirty money connects to criminal activity and law-enforcement officials would not only seize the money, but can create a paper trail that can put the criminal behind bars.

How does it work? At its simplest, money laundering is the act of making money that comes from Source A (dealing drugs) look like it comes from Source B (winnings from casino).

4.6.4.3.1 The Effects of Money Laundering

On the **socio-cultural end of the spectrum**, successfully laundering money means that criminal activity actually does pay off for the criminals. This success encourages them to continue their illicit schemes because they get to spend the profit with no repercussions. This means more fraud, more corporate embezzling (which means more workers losing their pensions when the corporation collapses), more drugs on the streets, more drug-related crime, law-enforcement resources stretched beyond their means and a general loss of morale on the part of legitimate business people who don't break the law and don't make nearly the profits that the criminals do.

The **economic effects** are on a broader scale. **Major issues facing a city government** include errors in economic policy resulting from artificially inflated financial sectors. Massive influxes of dirty cash into particular areas of the economy that are desirable to money launderers, create false demand, and officials act on this new demand by adjusting economic policy. When the laundering process reaches a certain point, or if law-enforcement officials start to show interest, all of that money will suddenly disappear without any predictable economic cause, and that financial sector falls apart.

Some problems on a more local scale relate to taxation and small-business competition. Laundered money is usually untaxed, meaning the rest of us ultimately have to make up the loss in tax revenue. Also, legitimate small businesses can't compete with money-laundering front businesses that can afford to sell a product far cheaper because their primary purpose is to clean money, not turn a profit. They have so much cash coming in that they might even sell a product or service below cost.

A spokesman for one local casino said " it's not unusual for local businessmen to bring in large amounts of cash for gambling. A lot of that money is from people who have businesses here, who are taking the money out of their business and they're coming in and they're gambling," he said. (CBC)

The effect of successfully cleaning drug money is clear: More drugs, more crime, more violence.

4.6.4.3.2 Regulating the Casino industry

The Gaming industry is highly regulated in B.C. with the Gaming Act and its Regulations as well as the Criminal Code of Canada. A read of the Economic Impact Study done for the City of Surrey, emphasises this fact. There are very clear reporting requirements and staff are highly trained in reporting large and/or suspicious cash transactions.

According to this study, in 2011 the industry reported 63,472 of transactions over \$10,000 to FINTRAC. 673 suspicious transactions were reported. Increases in these reports were attributed to better reporting as opposed to more actual incidents.

Casino reports filed with the Financial Transactions and Reports Analysis Centre of Canada (FINTRAC), a federal money-laundering watchdog, show that while the dollar

value of suspicious transactions at casinos in other provinces has stayed the same or gone down in the past year, they have tripled in B.C.

While casino staff at the various levels may be properly carrying out their duties, that seems to be where the buck stops in the reporting of incidents to the RCMP. In response to a CBC FOI request, it was learned that \$8Million in unexplained transactions at 2 Lower Mainland Casinos, River Rock and Starlight, within a 3 month period in the spring/summer of 2010, were not reported to the police. According to the documents, the Casino security personnel noted the incidents and the casinos reported the activity to the B.C. Lottery Corporation. That was as far as it went.

In British Columbia, money laundering goes hand-in-hand with drug trafficking. The BC Marijuana industry is the number one cash crop in British Columbia and number two in Canada.

In the January 2000 ISSUE of U.S.Customs Today (CBP's official newsletter) the following article appeared:

BC Bud is cultivated throughout British Columbia—hence its name—and has earned Vancouver a reputation as the Amsterdam of North America. The BC Bud industry is thriving, due largely to the drug's ability to deliver quick, high profits at low risk to the seller.

The Hell's Angels motorcycle gang, Asian and other gangs in Canada control its cultivation and distribution. Canadian growers have to cope with increasingly violent assaults on their crops, not from law enforcement, but because of growing numbers of home-invasion robberies.

4.6.4.3.3 Summary

While the Federal Government has instituted the Proceeds of Crime (Money Laundering) and Terrorist Financing Act, and the Province of British Columbia has the Gaming Act, our law-enforcement agencies are abysmally underfunded and short-staffed in all areas of White Collar Crime

It is no secret that Money Laundering is taking place in all of our casinos. The Provincial Government, by failing to provide enough resources to combat this criminal activity, leaves itself open to charges of Money Laundering. By taking a cut of the casinos' income, BCLC could be charged with Receiving the Proceeds of Crime. At the same time, these statements hold true for any municipality that participates in the Casino industry.

The BC Lottery Corporation has a major conflict of interest since:

- It receives all reports of suspected money laundering
- It profits from all transactions whether legal or illegal
- It decides which reports are passed along to law enforcement agencies
- Reporting illegal transactions reduces criminal activity and thus BCLC's income
- Reducing BCLC's income results in reduced bonuses to BCLC executives
- There is no financial incentive for BCLC to scrupulously report all money laundering incidents

BCLC stands before the public and states that criminal activities are minimal and that there are all sorts of rules, regulations, policies and procedures in place to ensure that the rules are followed. The reality is that criminal activities are flourishing in casinos, and regardless of the regulations, the BCLC's system is flawed and failed to make the correct and ethical decision to report the \$8 Million in unexplained transactions to the RCMP.

4.6.4.4 Other Criminal Activity

A problem gambler short of funds may turn to criminal activity including burglary, fraud, credit card theft, forgery, embezzlement, selling drugs or stolen goods. According to one director of the New Jersey Council on Compulsive Gambling, the vast majority of people in Gamblers Anonymous admitted to supporting their habit through crime:

80 to 90 percent of people in Gamblers Anonymous will tell you they did something illegal in order to get money to gamble. A lot of them do white collar crimes, fraud, credit card and employee theft.

E. Looney, Director, New Jersey Council on Compulsive Gambling, 1998 [33][34]

4.6.4.5 Casinos and Crime Rate

While BCLC's Socio-Economic Impact Analysis (p.16) [42] states that the rate of crime has decreased in a number of Lower Mainland municipalities from 2002-2011, this marketing study was heavily biased.

The BCLC Impact Analysis was heavily biased by its selection of Casino sites in the lower mainland. Significantly, it omitted any mention of statistics at the Richmond River Rock Casino that is similar in size to the proposed South Surrey Casino Complex. According to the RCMP police reports, the crime rate quadrupled in the first six months after the opening of the River Rock Casino [18].

Credible research studies such as Grinols and Mustard [26] have found that when comparing similar communities, the criminal activity was 14% higher in communities with casinos than without.

Grinols and Mustard [26] is both a more credible and conclusive study than the BCLC study because their research paper is a longitudinal study which gathered data from across the country and over an extended period of time.

Police reports align with the findings of Grinols and Mustard and indicate that crime does increase in neighbourhoods where casinos are located. In fact, 18 senior active duty and retired police veterans from the RCMP and B. C. crime agencies, who have expertise in organized crime, gangs, money-laundering and related disciplines, issued a letter

opposing the expansion of the Edgewater Casino in Vancouver in 2011. In the a report entitled *The Case for Opposing the Expansion of Edgewater* [5] these police veterans say on page 7 :

That organized criminals and gang members frequent BC casinos and easily use them to launder money, or use them as sites for the operation of loan-sharking and prostitution, is well known. . . . Without significant changes in the policing protocol, and the adoption of rigorous crime control standards for casinos . . . we are in no position to deal with the increased criminal activity that will necessarily attend the development of a massive casino on the scale proposed here.

South Surrey will bear the brunt of increasing criminal activity if this casino proposal is allowed to go forward, but all of Surrey and the neighboring area will feel the impact.

4.7 Casinos and Charities

BCLC and Gateway point out that they support charities and that charities use their premises to fund raise.

In a study conducted by Jason Azmier and Robert Roach [66] for Canada West Foundation, an extensive survey found that 67% of British Columbian charities **did not** use casinos to fund raise. These non-users of casinos and other gambling modalities cited ethical factors:

- Charitable gaming increases the number of problem gamblers, who then are likely to become clients, thus erasing the profits
- The motivation behind charitable gambling is to have fun, get something for nothing; as a result, it does not encourage giving simply for the sake of good causes
- Charitable gambling erodes society's philanthropic spirit and cause support for charitable causes to decrease over the long-term

Respondents [charity organizations] stated that governments in Canada should provide more core funding to charities to reduce the need for charitable gambling.

Charities and governments should not be involved in an activity that causes hardship for people," said one respondent. "Gambling does more harm to gamblers than the good it does funding charitable organizations."

p.12-16 of [66]

4.8 Public Health Issues

Studies show a correlation between problem gambling and the prevalence of conditions such as depression, stress, moods, anxiety and personality disorders (Toronto Board of Health [46], pp. 10-12).

Gamblers report lower general health and well-being, with more colds and flu, chronic headaches, insomnia, chronic bronchitis and fibromyalgia. Problem gambling is connected to other substance addictions. Suicidal thoughts and attempts can be a tragic consequence of problem gambling. For 50 years, Las Vegas has had one of North America's highest per capita suicide rates. According to Professor Robert Williams, an expert in gambling addictions, an estimated 10% of all suicides are gambling-related [27].

Montreal's Public Health Department reports at least 20-30 gambling-related suicides in Quebec annually [7].

Research shows that problem gambling is associated with **family breakdown, divorce, intimate partner violence and a variety of familial psychological problems**. Often children are the ones to suffer from family breakdowns and the ensuing poverty. Children are also at risk of adopting the same health-threatening behaviours that they observed in their families [15].

Gamblers and their families are often embarrassed to tell their doctors and health providers that their stress, depression, insomnia, suicidal thoughts, and other disorders caused by their unhealthy gambling habit. Gamblers themselves may not realize the reason they suffer physical illnesses related to gambling.

Casino gambling presents major social and health problems to our citizens, their families and our Health System. Denying Gateway this casino license would be a major assistance for public health.

4.9 Location and Land Use

4.9.1 BCLC Market Survey

Since the original application in 2009, this development proposal has always been about using this site at 168th Street between 10th and 12th Avenue. The owners were able to purchase this land cheaply and speculated that the site would appreciate greatly if the site was granted a casino license. BCLC wants to move the license from Newton to a new location. From the beginning, the applicants' efforts have been directed towards awarding a casino license for this site rather than finding the best possible site.

The recently tabled Market Survey by HLT, an analysis consultant company hired by the BCLC, describes a market area ranging from the Canada-USA border to Newton along the Highway 99 corridor. Why then would BCLC and Gateway want a casino at the extreme south end of the described market? Simply because that is where this site is located.

From the marketing study, it is clear that a better location for a casino should be much further North and West of the proposed site. The small 3% of revenues expected from the USA is trivial and so does not justify this southerly location.

A site more central to the market area would have achieved two substantial benefits for BCLC and Gateway:

1. Include a wider populated area to the north and west near Newton and Delta.
2. Lessen the catchment overlap with Fraser Downs and Cascades.

Clearly, this is not the best site for another casino. It is the wrong location.

4.9.2 Concentration of Negative Impacts

Clustering three casinos within an 18 km area will substantially increase and intensify the negative impacts in the overlapped catchment areas. These negative impacts include diversion of revenues from other businesses, gambling addictions, crime, and public health costs.

Canadian Community Health data in 2002 found “elevated rates of problem gambling in communities with high concentrations of gambling opportunities” [57]. Within Canada, there is a significant positive association between the density of racetrack and casino facilities and the rate of problem gambling.

Figure 1 - Overlap of 20 km Radius Catchments of South Surrey, Fraser Downs, and Cascades demonstrates how these proposed catchments create a gambling-intense zone.

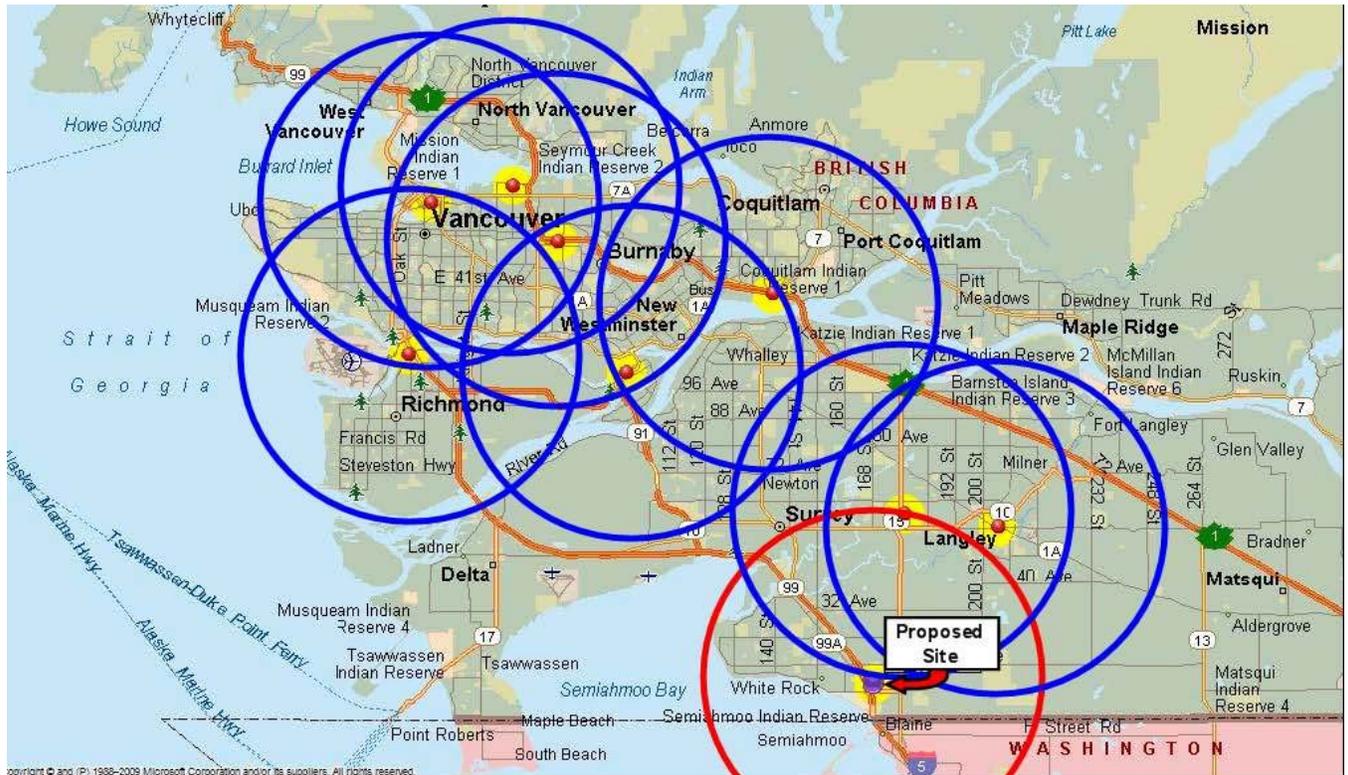


Figure 1 - Overlap of 20 km Radius Catchments of South Surrey, Fraser Downs, and Cascades

The result of clustering the casinos in the South Surrey-Cloverdale-Langley corridor will mean that South Surrey will be burdened with a disproportionately large share of the negative impacts of casino gambling with a disproportionately small share of the benefits.

4.9.3 Future of 99 Corridor Area

4.9.3.1 A Casino is Not the Way to Start Developing the 99 Corridor

The first businesses to be established in a development set a precedent for future development. A Casino sets the wrong precedent.

For a taste of what is to come, take a look at what Gateway currently offers Gamblers in Surrey. The developers promised to help revitalize the Newton area. Take a look a close

look at what was delivered. A dank combined Slots and Bingo hall. And take a close look at the businesses pulled in by the Casino: discount stores and pawn shops.

Family oriented businesses would avoid being located next to a casino. Many employers avoid locating their businesses near casinos because they know that employees will be drawn to the casinos which will impact productivity and attendance. Businesses want to portray a professional upscale image to their customers. This cannot be achieved when located next to a casino which carries with it a social stigma.

Employer's fears are well founded as can be seen from the following quote:

Problem gambling also affects the workplace. As the gambler's thoughts become more pre-occupied with "winning" or "chasing" (the term gamblers use to describe recouping one's losses), job performance suffers, absenteeism increases, and co-workers may be obliged to "pick up the slack." Professor Gary Smith, a researcher at the University of Alberta, estimates that each addicted gambler affects the lives of 10 to 17 family members, friends, and co-workers. As one addicted gambler put it, "If anyone would have told me six months ago I would steal from my employer, I would have said, absolutely no way!"

*Professor Gary Smith, University of Alberta
Quote taken from [67]*

Sometimes one needs to look beyond the hype and the promises of prosperity, and take a close look at the delivered reality.

4.9.3.2 Not the Correct Location for a Destination Convention Centre

This is not a location suitable for a destination convention centre. Destination convention centers require shops, cultural centers, and other attractions within walking distance of the hotel in order to attract convention business.

4.9.3.3 Not the Correct Location for a Casino

Council would be setting a dangerous precedent, as this will be the first Casino to be located in a residential and rural neighbourhood. All existing casinos are located in commercial/industrial zones where there are few residents to be disturbed. According to the City of Surrey's own planning report [4], 94% of residents who live within a 5km radius of the site are opposed to the site of the South Surrey Casino.

4.9.3.4 The Development is Too Massive for the Area

This not a normal business development because at its heart lies a 60,000 sq. ft. casino.

Notwithstanding the 99 Corridor local area plan, residents did not anticipate a casino the size of a football field, operating 24 hours a day, 7 days a week, with 1475 spaces including a 6 level parkade, 8 floors of attached hotel parking, an 800 seat auditorium, multiple outlets where patrons will purchase and consume alcoholic beverages, plus a 200 room hotel and 27,000 sq. ft. convention space. This is simply beyond the nature, scale, scope and disruption that a reasonable business or resident would contemplate. The proposed casino would make up three quarters of the revenue while the amenities make up less than 25%.

4.9.3.5 Not Family Oriented

This is definitely not a family oriented development. It is not appropriate to take children to see a performance at a site where they will be exposed to a Casino and its associated ill

effects. Studies have shown that children become desensitized to gambling and are thus more likely to become gamblers themselves [38].

We can only speculate which types of businesses will choose to be neighbours of this casino. What tone does this set for the area? Families will be reluctant to take their children to the proposed Fergus creek park that is adjacent to the casino.

4.9.3.6 A Better Way to Develop South Surrey

We do not want a community where hundreds of drinking drivers will leave the casino to endanger residents after they have been to the casino and its many bars. Gateway makes claims of excellent security of the site, but has no jurisdiction beyond their property, hence the fears of neighboring residents.

A more reasoned vision would be to transition the area to the already planned wholesale and retail commercial businesses that generally operate during the daytime hours. It should include a hotel, shops, and services that support the growing Douglas community in the area south of 8th Ave. It should include an area where families are not afraid to let their children walk to school or play in a park.

This application by Gateway does not measure up to Surrey's economic development vision [1].

It is time to step back and envision this area from the perspective of residents, who are the voters.

4.9.4 Our Position is Not NIMBY

4.9.4.1 NIMBY does not apply to Casinos

Some Casino advocates have called our position NIMBY (Not In My Backyard). We point out that this is not the case. NIMBY refers to a project that has shown to be of benefit to society but which nobody wants to have located in his or her neighbourhood. Garbage dumps are an example. We need to have them, but who would want to live beside one?

NIMBY does not apply to Casinos however. It has been known in academia for decades that gambling does not benefit society, and therefore the concept of NIMBY does not apply. One cannot be NIMBY about toxic waste generating plants because there is no benefit to society to having such a plant. There is no benefit to the community for it to be placed in anyone's backyard. The same argument applies to Casinos. It is well known that they produce no net jobs and produce nothing of value; they do not create wealth but merely redistribute it from the vulnerable to the already rich. Therefore, the term NIMBY does not apply to NoCasinoSurrey's position.

Ours is not a NIMBY argument. Ours is an "our backyard does not need the associated crime, financial hardship and social problems associated with a casino, and neither does yours" argument. Crime and financial hardship do not benefit the community, so our position is not NIMBY.

If we must have another casino, it should not be located near any residential area since it has been shown that addiction rates increase as casinos are located nearer and nearer to residential locations. This is particularly true for the community of South Surrey where

its residents include especially vulnerable groups such as seniors, whose addiction rates at casinos are more than triple that of the general population.

4.10 Vision and Values

A city's vision influences and shapes the way it grows. It forms who we become as a community. The citizens of Surrey elected the Honourable Mayor Dianne Watts and the Surrey First councillors because they represent the best in local government when it comes to vision and long-term strategy and values.

We endorse the Official Community Plan (OCP) and the City Council's economic development strategy [1] which states as one of its goals *"to support a high quality of life for its residents, workforce and visitors"*. The City of Surrey's Official Community Plan [2] speaks of *"enhanced social well-being"*. In 2006 City Council adopted a Plan for the Social Well-Being of Surrey Residents [16], which we applaud, that focuses on 5 social issue areas:

- Children and Youth
- Housing and Homelessness
- Community Development and Inclusion
- Crime and Public Safety
- Substance Abuse and Addictions

We endorse the vision and strategies of council. We encourage councillors to continue on this path of promoting family values, health, and prosperity for the residents of Surrey. The creation of another gambling establishment in South Surrey contradicts this vision.

The proposed South Surrey Casino threatens all aspects of City Council's Plan for the Social Well-Being of Surrey Residents. The following five sections look at the impact of a Casino on each of these social issues.

4.10.1 Children and Youth

Children and Youth will be at risk due to direct exposure to local Gambling and the effects of Gambling [8] and the associated Crime and Drugs which Casinos attract like a magnet according to RCMP Police reports [17][18][20] and various newspaper articles [19][21][22][23].

4.10.2 Housing and Homelessness

Housing and Homelessness conditions will worsen as people lose their homes to gambling addictions. Of people who gamble, 5% will become problem gamblers and be at risk of losing their homes. For seniors, the risk is 18%, and for those who play slots the risk of becoming a problem gambler is 36%.

In comparison, the addiction rate for heroin users is 25% [65].

4.10.3 Community Development and Inclusion

4.10.3.1 Community Development

Community Development of this peaceful residential and rural community will be destroyed by the introduction of the Casino and by the crime and associated support industries of pawnshops, loan-sharking, money laundering, and prostitution that it brings.

4.10.3.2 Inclusion

Inclusion, as advocated in Council's vision statements, suffers when the desires and voice of local residents are overshadowed and ignored by the special interests of Casino owners who intentionally bussed in hundreds of employees from out of town in order to drown out the voice of local residents. They occupied Council Chamber seats so that residents could not get seated or even get into the Chamber for the City of Surrey Land Use Committee meeting on December 10th 2012. Gateway blocked the hallways into Council Chambers and prevented residents from participating in the meeting.

It was well documented in local newspapers that the casino operators flooded chambers with their own employees from out of town in order to influence council and prevent the concerns of Surrey residents from being felt [24][25]. The four busloads of Gateway employees that flooded Council Chambers were bussed in from various Gateway Casino locations including the Grand Villa Casino in Burnaby. These are the actions of a group that are focussed on excluding the community from the debate, not including them.

4.10.4 Crime and Public Safety

Crime has been shown to increase by as much as four times in a neighbourhood once a large casino is built. This happened in Richmond's Bridgeport neighbourhood once the River Rock Casino was built. This is based on actual police reports as presented by an RCMP spokesperson and documented in [18].

Public Safety has been shown to suffer in neighbourhoods with Casinos as reported in RCMP Police reports [17][18][20] and various newspaper articles [19][21][22][23].

Those who stand to gain by the Casino say that crime rates are lower in communities with Casinos, but this is simply not true. It is a half-truth taken out of context to deceive both the public and City Council. They talk only about the number of reported crimes, not the actual number of crimes, many of which go unreported such as money laundering and loan-sharking. The BCLC study [57] excludes data from casinos such as the River Rock where it is known that crime rates quadrupled [18].

To get an unbiased picture on the effect of Casinos on crime, one must turn to police reports and other authoritative peer-reviewed academic sources. Police reports indicate that crime rates quadrupled in places like Richmond's Bridgeport community following the construction of the River Rock Casino [18].

Academic peer-reviewed studies such as [26] show that roughly 8% of crime is attributable to casinos, costing the average adult \$75 per year in those communities with Casinos compared to those without. This same study reports that while crime rates are typically flat after the construction of a casino, the crime rates show a sharp increase two years and onward after the introduction of a casino.

This increased crime rate continues to grow for five years or more and the list of crimes includes the following:

- robbery
- aggravated assault
- auto-theft
- burglary
- larceny
- forcible confinement
- kidnapping
- murder

This can be seen in Figure 2 below from the Grinols and Mustard study [26] on page 32.

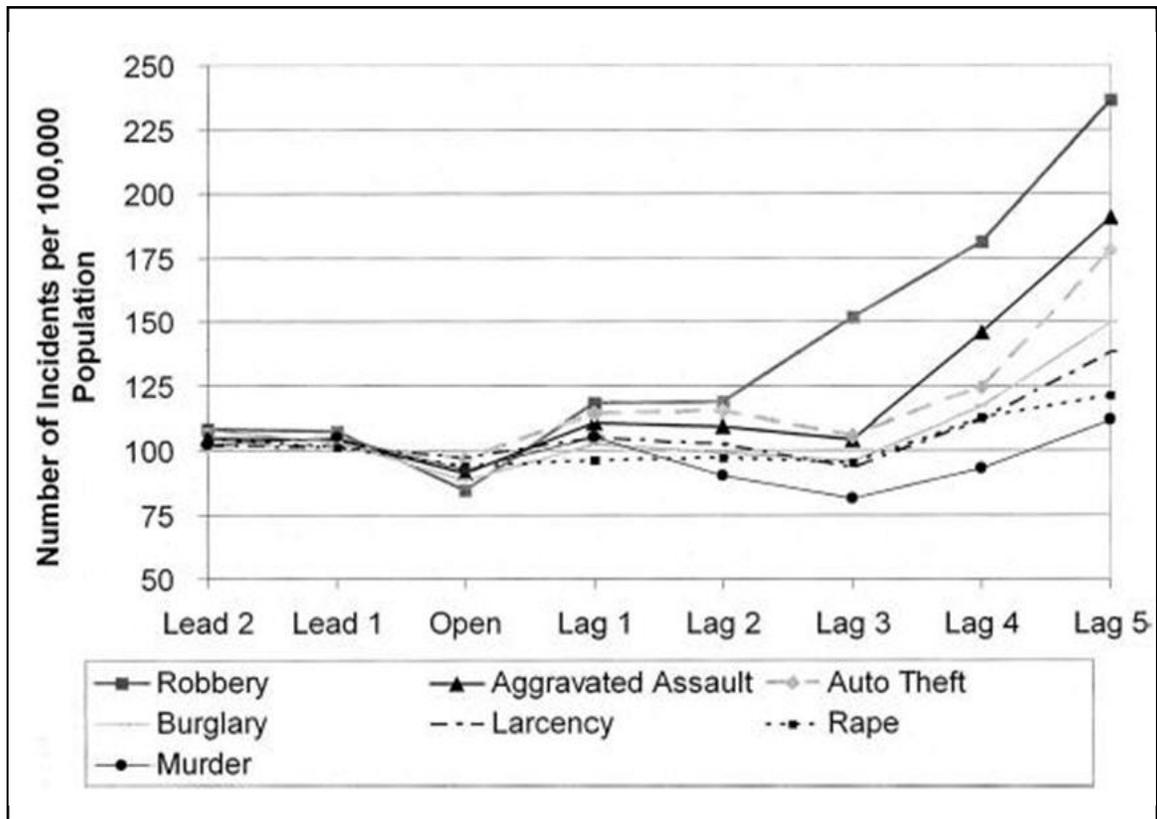


Figure 2 - Crime Rates for the 2 lead years before a Casino is built through opening, and the 5 years after the Casino begins operation

4.10.5 Substance Abuse and Addictions

This proposal adversely affects society with respect to substance abuse and addictions.

4.10.5.1 Drug and Alcohol Abuse

Alcohol addiction increases in casinos with their steady flow of available alcohol from the many bars, lounges, and pubs available in the complex. Criminals are known to

frequent casinos [17] and drugs will be offered for sale along with easy access to prostitutes and loan-sharking[35][36][37].

4.10.5.2 Gambling Addictions

It is well documented that Casinos lead to Gambling Addictions in as much as 5% of gamblers. Addicted gamblers tend to be in denial, just like alcoholics and other addicts, and very few seek treatment. Of those that do, about a third of gamblers who seek help will not be able to overcome their addiction and will sink deeper and deeper into debt with many ending their gambling careers in bankruptcy and homelessness.

What is less well known is that the Casino business relies on problem gamblers for a large portion of their gambling revenues. Casinos derive as much as 36% of their revenue from the pockets of problem gambler according to [12]. Therefore, Casinos have a strong motivation to create addiction in gamblers.

This same study [12] reported:

This evidence indicates that gambling machines [Slot Machines] and horseracing derive a much larger portion of their revenue from problem gamblers, in comparison to other forms of gambling. In rank order, the rough proportions [of revenue derived from problems gamblers] are:

- 61% gambling machines [Slot Machines]
- 45% horse racing
- 32% casino table games
- 22% bingo and raffles
- 18% lotteries, instant win, and Sports Select

Gateway plans to use most of its floor space for such electronic gambling machines such as slot machines that derive most of their revenue (61%) from problem gamblers. This does not appear to be the action of a company that puts the community first.

4.10.6 Impact of Casinos on City Council's Vision and Values

It is clear from the evidence reported by Police, Newspapers, and Peer-Reviewed Academic Literature that the operation of Casinos within the City is not consistent with the excellent vision of City Council. Casinos bring socio-economic hardships that are incompatible with all five social issue areas that City Council advocates for on behalf of Surrey residents:

- Children and Youth
- Housing and Homelessness
- Community Development and Inclusion
- Crime and Public Safety
- Substance Abuse and Addictions

We ask that City Council see beyond the hype and promises of those who would profit from the proposed South Surrey casino, and support the residents of Surrey in opposing this harmful proposal.

4.11 Public Process and Opinion

We agree with the City of Surrey's economic development vision: *"to support a high quality of life for its residents, workforce and visitors through sustainable development that carefully integrates economic, environmental and social/cultural interests."*

We do not believe that the inclusion of a casino in this development is in concert with Council's vision nor with the residents of our community.

Prime consideration must be given to residents of Surrey who must live with the consequences of Council's decision. Residents expect Council to represent the views of residents.

One of our reasons for including the VancouverNotVegas Report is to put forward by name the eminent leaders of society around the GVRD who spoke out against expansion of the Edgewater Casino. They also voiced their negative views of the social and economic impacts of casino gambling in general. Other references included in the bibliography bring in studies, opinions of experts and findings that may help the Council to make the right decision.

Opposition to Casino gambling increases in Canada every year. The Socio-Economic impact of Casinos far exceeds the advertised benefits and Canadian voters are finally realizing this more and more.

Perhaps the most definitive poll of the residents of all of Surrey was conducted by City Staff and documented in the City of Surrey planning report [4] which stated that the majority of residents say NO to this proposal.

- City-Wide, 83.5% of Surrey Residents say NO to the Casino
- Within 5 kms of the proposed site, 94% Surrey Residents say NO to the Casino

4.11.1 City-Wide, 83.5% of Surrey Residents say NO to the Casino

According to the City of Surrey's own Dec 10th 2012 planning report, 83.5% of Surrey Residents say NO to the proposed South Surrey Casino.

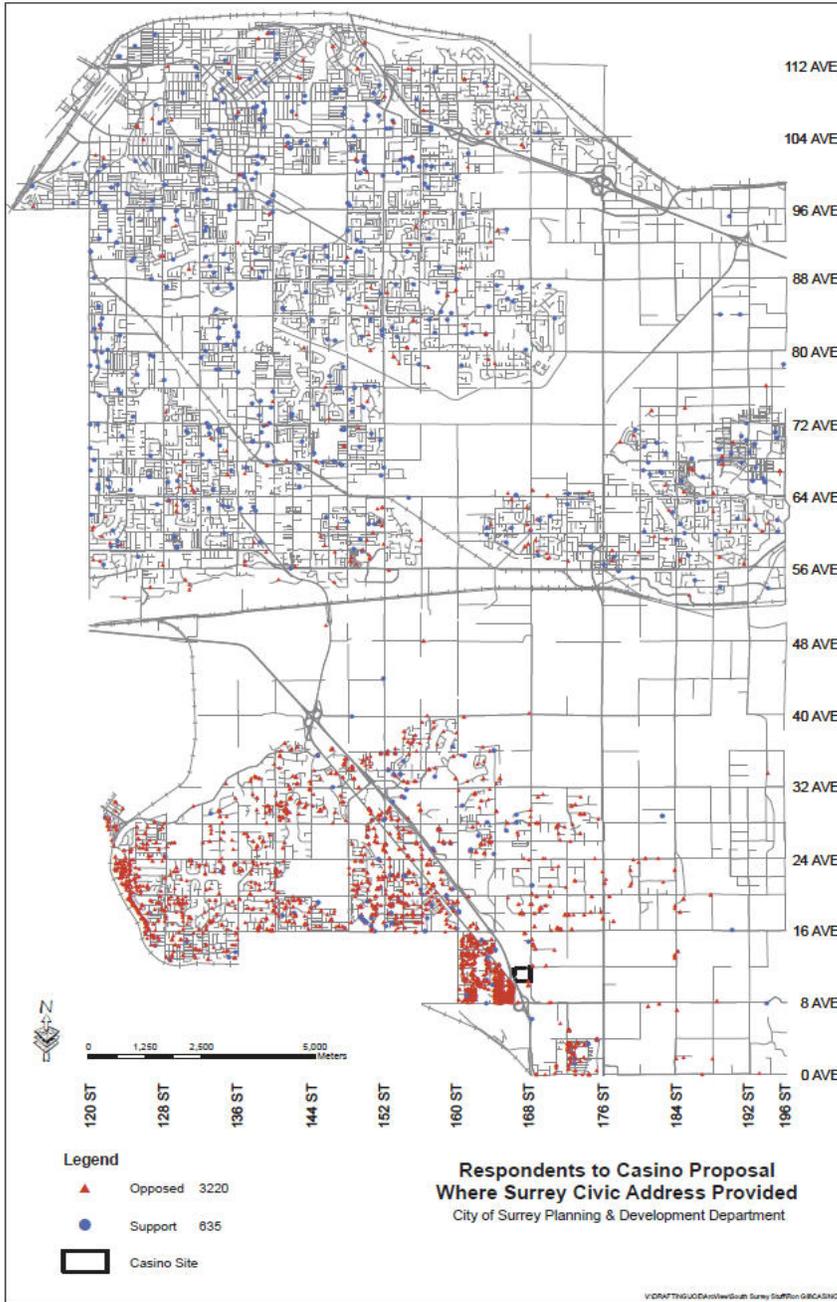


Figure 3 - City-Wide 83.5% of Residents say NO to the proposed South Surrey Casino

4.11.2 Within 5 kms of the site, 94% of Residents say NO to a Casino

Within 5kms of the proposed South Surrey Casino, the city report clearly shows that 94% of residents are opposed to this casino proposal.

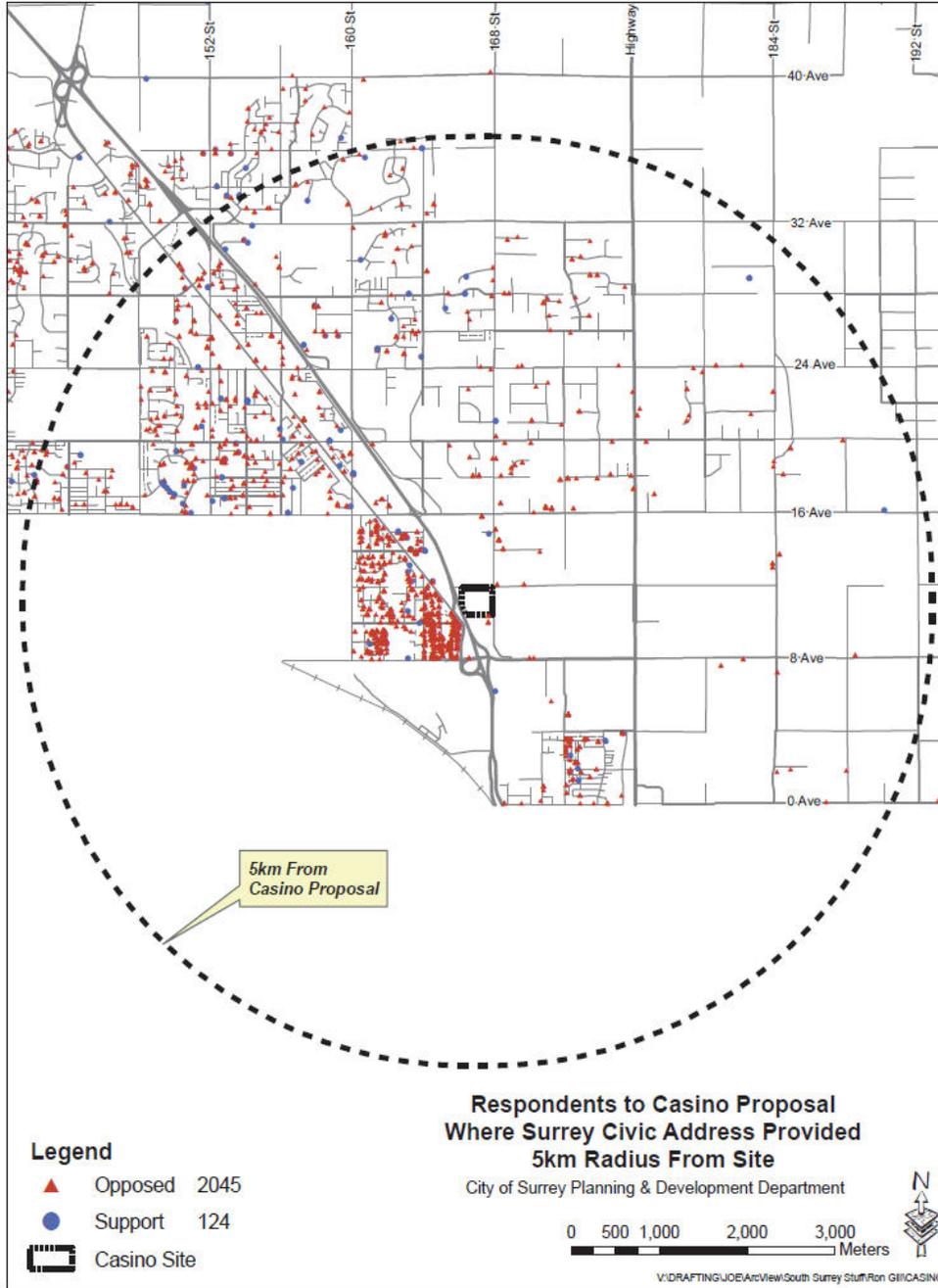


Figure 4 - Within 5kms of the site, 94% of Residents say NO to the proposed South Surrey Casino

5. Conclusion

NoCasinoSurrey believes that through petitions, letters and other representations, that the residents of Surrey have stated their opposition to the Casino proposal in South Surrey very clearly, with 83.5% of Surrey Residents opposed to the Casino city wide, and 94% opposed within the affected community that is within a 5 km radius of the proposed site.

NoCasinoSurrey does not support the application for a casino in South Surrey. It is not sufficiently supported by the HLT Market Study and is of a scale and character that is not consistent with normal and acceptable commercial and business activity in this location.

Expanding gambling into South Surrey is not aligned with the City's stated economic development vision that is to support a high quality of life for its residents, workforce and visitors through sustainable development that carefully integrates economic, environmental and social/cultural values.

The negative impacts of expanded casino gambling as proposed in this application exceed the projected benefits and thus would become an socio-economic burden to the City, its residents and businesses. Therefore, **the application should be denied.**

This is a submission in good faith to address permit application no. 7912.0299.00, by 0854559 B.C. Ltd. Inc. No.0930408 Titled: *Gaming License to permit the operation of a casino within a proposed hotel, convention centre, entertainment and gaming facility.*

LOCATION: 1083, 1109 and 1177 – 168 Street and 1068 Highway 99

ZONING: RA

OCP DESIGNATION: Suburban

LAP DESIGNATION: Business Park and

Commercial/Business Park

File # 7912-0299-00 & 7909-0169-00

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