



GEORGIA STATE SENATE SENATE RESEARCH OFFICE

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THE FINAL REPORT OF THE SENATE COAM STUDY COMMITTEE

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Prepared by the Senate Research Office

2020

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COMMITTEE FOCUS, CREATION, AND DUTIES

The Senate COAM Study Committee (“Committee”) was created by Senate Resolution 1024 to study the current statutory, regulatory, and operational framework of the bona fide coin operated amusement machine (“COAM”) industry and the potential need for additional measures to aid the Georgia Lottery Corporation in the regulation.¹

Senator John F. Kennedy of the 18th served as Chair of the Committee. The other Senate members included: Senator Brandon Beach of the 21st; Senator Ed Harbison of the 15th; Senator Brian Strickland of the 17th; and Senator Larry Walker of the 20th. Lieutenant Governor Geoff Duncan appointed the following citizen members to the Committee: Nick Damani (Ultra); Gretchen Corbin (Georgia Lottery Corporation); Jamie Boyden (Lucky Bucks); John Douglas (COAM License Holder); Dhaval “Bunty” Doshi (United Gaming); and *ex-officio* member Chuck Brooks (Epic Amusement).

The Committee held three informational meetings on September 23rd, October 22nd, and November 12th, all at the Georgia State Capitol. The Committee heard testimony from the following individuals: Ms. Gretchen Corbin, President and CEO of the Georgia Lottery Corporation; Ms. Angela Holland, President of the Georgia Association of Convenience Stores; Mr. David Jaffer, Attorney for United C-Stores; Mr. Les Schneider with the Georgia Amusement and Music Operators Association; Mr. Paul Oeland with United Gaming; Mr. Edward Lindsey with Lucky Bucks; and Mr. Paul Jensen with Taft, Stettinius & Hollister LLP. The three informational meetings were designed to discuss the past, present, and future of the COAM industry in Georgia respectively.

The following legislative staff members were assigned to this Committee: Mrs. Katherine Russell and Mr. Ryan Bowersox of the Senate Research Office; Mr. Andrew Allison of the Senate Press Office; Mrs. Shawn Marie Story of the Legislative Counsel Office; and Ms. Ali Farmer, Legislative Assistant to Senator Kennedy.

COMMITTEE MEETINGS AND TESTIMONY

A. Meeting #1 – September 23, 2020

The first meeting was held on September 23, 2020 at the Georgia State Capitol.

- **Ms. Gretchen Corbin, President and CEO, Georgia Lottery Corporation**

Ms. Gretchen Corbin presented on behalf of the Georgia Lottery Corporation, to provide the Committee with an overview and history of the COAM industry in Georgia. Her presentation materials are attached as Appendix V. She presented on many topics and answered questions from the Committee members. The issues discussed are as follows:

1. Georgia Lottery Legislative History

¹ 2020 Georgia Senate Resolution 1024 (adopted on June 25, 2020), <http://www.legis.ga.gov/legislation/en-US/Display/20192020/SR/1024>.

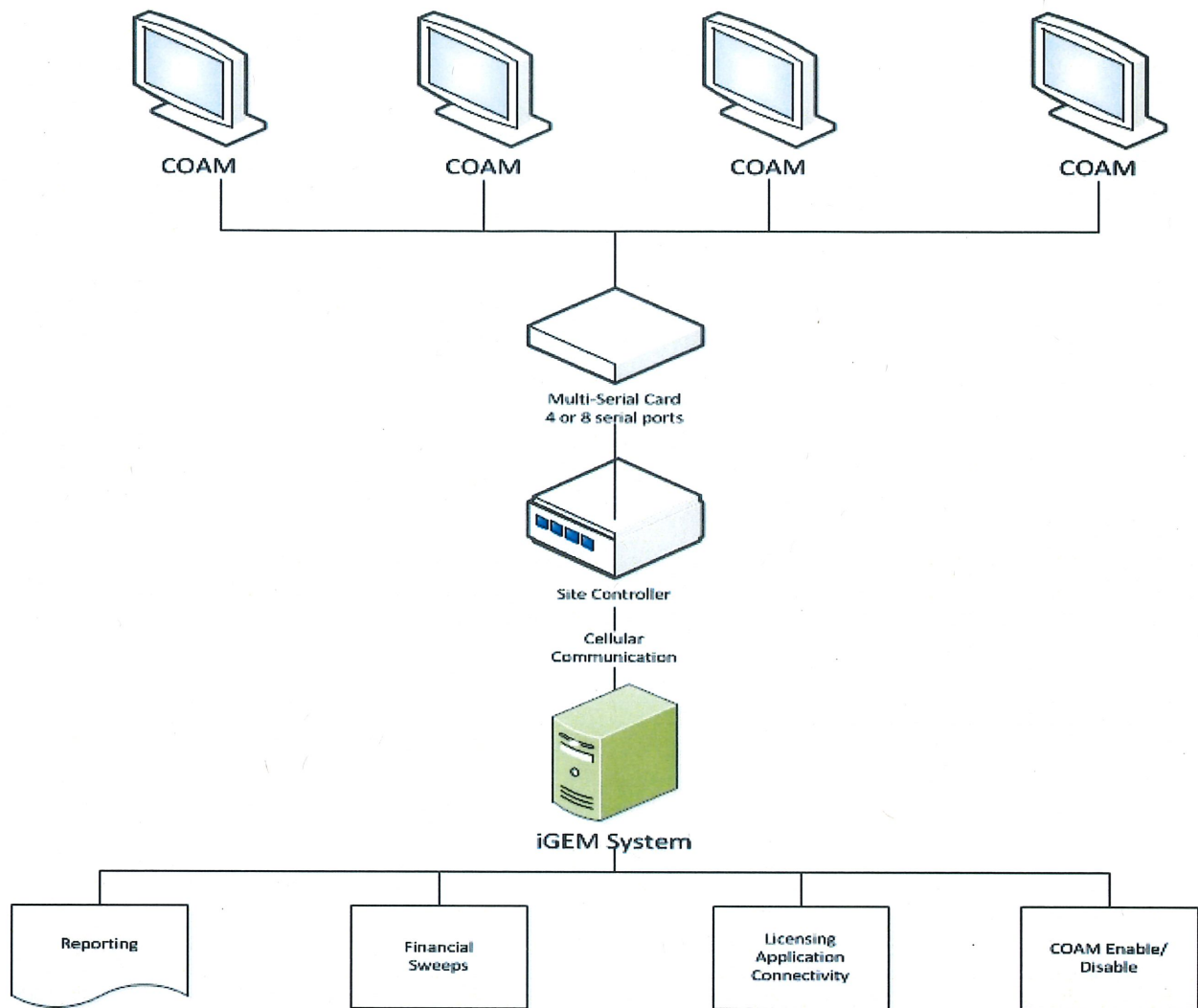
Ms. Corbin provided an overview of significant legislative changes to the COAM industry. House Bill 487, passed in 2013, significantly changed the COAM industry by transferring responsibility for administration and enforcement of COAMs from the Department of Revenue to the Georgia Lottery Corporation. Senate Bill 190, passed in 2015, increased the costs of various licenses and fees involved in COAMs and required arbitration to certify there are no disputes between Master Licensees and Location Licensees. In 2016, Senate Bill 388 added further regulation to the COAM industry, including requiring a one year minimum on contracts. Senate Bill 388 also provided that, when a change of ownerships of locations occurs, the new location owner must either keep the last operator or not have COAMs at the location for nine months (the "Nine-Month Rule").

2. COAM Machines

A COAM is a machine used by the public to provide amusement or entertainment that is operated by the payment or insertion of a coin, bill, other money, token, ticket, card, or similar object, and the result of the machine's operation depends in whole or in part upon the skill of a player. There are two classes of COAMs: Class A machines that do not allow a successful player to carry over points won on one play to a subsequent play or plays (examples include: jukeboxes, crane machines, and skee ball machines); and Class B machines which do allow a successful player to accrue points on the machine or carry over points won on one play to a subsequent play (examples include video line-up and match-up machines requiring some skill). Players who successfully win on Class B machines earn points or vouchers that may be redeemed only at the premises where the game or device is located. Points or vouchers can be exchanged for prizes including lottery tickets, food and beverages, store merchandise, fuel, or gift cards to that establishment. Items not permissible as prizes include cash, alcohol, tobacco, and firearms.

3. Central Accounting System and Revenue Collection

The Georgia Lottery Corporation is responsible for the administration and enforcement of laws and regulations regarding COAMs in Georgia. The Georgia Lottery Corporation is responsible for issuing licenses to owners and operators, manufacturers and distributors, issuing decals for COAMs, collecting revenue from licenses and decals, collecting net proceeds on Class B machines, and ensuring compliance with laws, rules, and regulation. Through its administration of COAMs, the Georgia Lottery Corporation utilizes a central accounting system (displayed below), which has been in place since 2015. The central accounting system allows for the collection of revenue and allows COAMs to be enabled and disabled remotely.



4. Net Receipt Revenue Division

The Georgia Lottery Corporation retains 10 percent of net receipts, with the remainder split between the Location Licensees and Master Licensees. This results in a 45/10/45 split between the location licensees/ the Georgia Lottery Corporation/ master license holders.²

Location Licensee Share	Lottery Corporation Share	Master Licensee Share
45%	10%	45%

5. Gross Retail Receipts Rule (50/50 Rule)

There are a number of rules governing how location licensees carry out their business in regards to the use of COAMs. One prominent rule governs the percentage of Gross Retail Receipts that a location licensee can derive from COAM business. Specifically, it requires that at least 50% of its sales (or gross retail receipts) be from something other than COAMs. O.C.G.A. § 50-27-84(b)(1) states that:

² O.C.G.A. § 50-27-102.

No location owner or location operator shall derive more than 50 percent of such location owner's or location operator's monthly gross retail receipts for the business location in which the Class B machine or machines are situated from such Class B machines; provided, however, that revenues that are due to a master licensee or the corporation or noncash redemption that is earned by the player shall not be deemed revenue derived from Class B machines.

6. The Nine-Month Rule

Another rule controlling contracts and enforcement of COAMs is the Nine-Month Rule, discussed briefly above. According to O.C.G.A. § 50-27-87(b)(3)(C)”

Any applicant for a new location license for a location where machines have been placed at any time in the immediately preceding nine months shall either:

(i) Not place machines in such location for nine months from the date of the granting of the location license; or

(ii) Formally accept an assignment of the written agreement between the master licensee and the immediately preceding location owner or location operator; provided, however, that the master licensee may refuse to assign the written agreement.

7. COAM Manufacturers and Distributors

The Georgia Lottery Corporation is responsible for all Location Licenses and Manufacturer and Distributor Licenses. A Location License is the initial and annually renewed license that every business location owner or business location operator must purchase and display in the location where one or more COAMs are available for commercial use by the public for play in order to operate legally any such machine in this state. A Class A license costs \$25 per machine, and a Class B license costs \$125 per machine. A “Manufacturer” is a person, individual, partnership, corporation, limited liability company, or any other business entity that supplies and sells major components or parts, including software, hardware, or both, to Class B machine distributors or operators. A “Distributor” means a person, individual, partnership, corporation, limited liability company, or any other business entity that buys, sells, or distributes Class B machines to or from operators.³ A Manufacturer and Distributor Licenses costs \$5,000.

8. Georgia Lottery Gift Card Pilot Program

The Georgia Lottery Corporation is currently instituting the Georgia Lottery Gift Card Pilot Program as a potential innovation to COAM redemption. Under the Pilot Program, players winning on Class B machines may receive a gift card uniquely identified as a Georgia Lottery product that can be utilized at the location and other participating locations. The Pilot Program will involve between 100 and 300 locations and last approximately four to six months.

³ O.C.G.A. § 50-27-70.

B. Meeting #2 – October 22, 2020

The second meeting was held on October 22 at the Georgia State Capitol. The Committee heard testimony from the following individuals providing an overview of the current state of the COAM industry in Georgia:

- **Ms. Angela Holland, President of the Georgia Association of Convenience Stores**
- **Mr. David Jaffer, Attorney for United C-Stores**
- **Mr. Les Schneider, Georgia Amusement and Music Operators Association**
- **Mr. Paul Oeland, United Gaming**
- **Mr. Edward Lindsey, Lucky Bucks**

1. Location Licensees

Ms. Angela Holland, representing the Georgia Association of Convenience Stores, spoke on behalf of the convenience stores containing COAMs. She recognized that some entities involved with COAMs do not currently follow the law and stated that her association would like to see regulation that does not punish those stores that are operating in compliance with the law. She did express support for the adoption of more enforcement measures, so long as those measures: (1) do not punish locations that are in compliance with the law; (2) ensure freedom of contract between locations and master license holders; and (3) provide for a robust system of enforcement so that bad actors do not gain an unfair advantage. Additionally, she expressed the association's support for the Georgia Lottery Corporation's Gift Card Pilot Program.

Conversation amongst committee members focused on the challenges of enforcing the ban on illegal inducements between master license holders and location licensees. Mention was made of the cash payments and other illegal incentives being exchanged. Chairman Kennedy noted that nothing of value can be exchanged between the parties according to current law. Some asked how a third party could infiltrate an arrangement when there are only two parties and they are operating according to private contracts. Mr. Doshi asked Ms. Holland what enforcement laws are currently available; she mentioned the 50/50 Rule and the Nine-Month Rule. She also expressed that the Nine-Month Rule deflates the value of convenience store real estate when convenience stores need to sell their locations.

Mr. David Jaffer, representing United C-stores, discussed the size and importance of the convenience store industry in Georgia, and he explained that nearly two-thirds of those stores have COAMs. The materials that Mr. Jaffer presented to the Committee are attached to this report as Appendix VI. He explained that previous legislation and innovation concerning COAMs has led to greater compliance, trust in the industry, and ultimately has increased revenue. He credits the Georgia Lottery Corporation's accounting and revenue collection system as a major improvement, which has resulted in increased revenue collection and disbursement to education and has created a solid foundation for expansion in the industry. However, Mr. Jaffer also proposed many potential improvements. He advocated against banning inducements, and he proposed that store owners be allowed to accept contract incentives similar to other contracts the locations enter into. He said that more flexibility should be allowed under the "50/50 Rule" (requiring no more than 50 percent of a location's revenue come from gaming). He advocated for more equity in statute between locations and

master license holders, more transportability for winnings, a better redemption system such as the Gift Card Pilot Program, and a more equitable distribution of COAM revenue to benefit the locations handling more responsibility.

2. Master License Holders

Mr. Les Schneider, representing the Georgia Amusement and Music Operators Association, provided a history of gaming in Georgia. He highlighted the advantages brought about by changes to the regulation and revenue collection system resulting from HB 487 in 2013. He stated that further industry regulation should attempt to provide stability and punish bad actors. He advocated for increased cross marketing between traditional lottery games and COAMs, and he expressed support for the Georgia Lottery gift card system that is currently being tested. He believed that all payouts should be processed through either lottery tickets or gift cards, because it would ease regulation and assist in sales tax compliance. He opposed further involvement by the Georgia Lottery Corporation in determining with which master license holder a location owner selects to do business.

Mr. Paul Oeland, an Atlanta attorney with United Gaming, presented a PowerPoint providing an overview of the regulatory history of the industry, the current state of COAMs, and a potential look to the future of the industry. Mr. Oeland's presentation materials are attached as Appendix VII to this report. He described the 2013 legislation (House Bill 487) as a revolution that provided needed regulation and stability to the industry. He further explained that this regulation ultimately enhanced compliance and increased revenue for all parties involved. He highlighted regulations that have had a strong impact on the industry. Specifically, he stated that the 50/50 Rule helped eliminate gaming rooms, the arbitration requirement provided efficient dispute resolution, and the Nine-Month Rule provided industry stability. Mr. Oeland concluded by saying that further changes could help eliminate fraudulent ownership changes, reduce unscrupulous business practices, and improve redemption.

Mr. Edward Lindsey, with Lucky Bucks, concluded testimony from the parties representing the master license holders. He stated there are still potential improvements that could be made to the industry and that the master license holders would help assist the process moving forward.

C. Meeting #3 – November 12, 2020

The Committee held a third meeting on November 12 at the Georgia State Capitol. The Committee heard testimony from the following individuals concerning the future of the COAM industry in Georgia and recommendations for regulatory changes to the industry:

- Mr. Paul Jensen, Taft, Stettinius & Hollister LLP
- Mr. Paul Oeland, United Gaming
- Mr. David Jaffer, Attorney for United C-Stores
- Ms. Angela Holland, President of the Georgia Association of Convenience Stores

1. Illinois Gaming Overview

Mr. Paul Jensen, an attorney with Taft, Stettinius, and Hollister in Chicago, gave an overview of what legislative efforts have been enacted in Illinois in the distributed gaming and convenience markets. This area covers Video Gaming Terminals ("VGT"), which are comparable to COAMs in Georgia.⁴ He explained that the markets in Illinois are similar to those in Georgia, and he gave a description of requirements for placing VGTs in the community, licensing requirements established for participants in the market, and the Illinois Gaming Board and its oversight and regulatory responsibilities.

a. Illinois Video Gaming Act

In 2009, Illinois needed to fill holes in the state's budget in a way other than raising taxes. There were an estimated 50,000 "gray" slot machines already present in the state in bars and other locations. These machines were fully illegal in the way they were being used, but local law enforcement did not have personnel to address the problem. As a result, the games existed in an unregulated and untaxed fashion.

The Illinois Gaming Act allows for up to 6 VGTs in any one location that holds a liquor license and allows for the consumption of alcohol on the premises (e.g., bars, restaurants, fraternal organizations, and VFWs), but does not include packages stores. Additionally, other locations, such as truck stops, are allowed to have VGTs; the number of VGTs varies depending on the size of the truck stop, with a limit of 10.

The Act and its licensees are regulated by the Illinois Gaming Board ("IGB"), the same state organization that oversees casinos and sports wagering. Hours of operation for VGTs are limited, as well as the amount a player can bet and how much a player can win. Additionally, VGTs are prohibited from being inside establishments located within 1,000 feet of a casino or horserace track, 100 feet of a school, or in a municipality that has opted out of the act.

IGB is assisted in regulating the VGTs by a central communication system run by Scientific Games. The system reports how much money was played, how much was won, and how much is owed to the state in tax revenue. The system can turn off VGTs remotely if there is a problem with licensing or if machines are being run after hours.

The Illinois Gaming Act provides for three levels of licensure: (1) Manufacturers and Distributor; (2) Terminal Operators; and (3) Establishments. Distributors sell or lease the machines to terminal operators, and the distributors also service and repair the VGTs. Terminal operators operate the VGTs and are the focus of most of the regulations. They are also responsible for collecting money from VGTs and paying the state what is due every 15 days. Establishments house the VGTs and are responsible for their safekeeping and for ensuring that patrons under 21 years of age is not using them. These licenses are good for one year.

Written use agreements are required for placements of VGTs in establishments. These agreements can be for a period up to eight years. IGB mandates the incorporation of certain

⁴ It should be noted that Georgia has a non-cash redemption market, while Illinois allows cash awards as prizes for its VGT.

provisions in the use agreements, including the revenue split which is already established by statute. Because of this, negotiation of different splits is illegal in Illinois. Because inducements are illegal, use agreements must also include a statement that no inducements have occurred. (Criminal penalties exist for those that violate the inducement law).

Redemption terminals are where players go to redeem winnings. The VGT will issue a ticket to the player, who then takes it to a redemption terminal. This prevents bartenders and others from having to handle winnings, which increases security.

Investigation before licensure is a significant obstacle in Illinois. Company owners, operators, investors, decision making employees, and anyone the IGB chooses to investigate are susceptible to scrutiny. This investigation includes any and all interaction with law enforcement; it is not limited to convictions. Family history, financial history, fingerprints and other information may be gathered. It is not unusual for the IGB to question neighbors of an applicant.

b. Lessons from Illinois's Experience

Mr. Jenson believes that the state of Illinois did some things very well. For example, he states that the best decision the Illinois legislature made was putting the IGB in charge of the program and giving them significant authority to regulate it.

Beyond that, he credits the three-tier licensing system with promoting healthy competition within each bracket and video gaming for creating many jobs. He also supported the no-inducement component of law and supported the decision that felons are not allowed to be licensed. He explained that this bolsters the integrity and trust of the public in gaming. Additionally, legalizing the VGTs cut down on gray machine use and other illegal gambling taking place within the state.

There are some areas Mr. Jenson believed needed improvement, and he believes that Georgians could learn from these issues. He would like to see more clarity on what is and is not an inducement because market participants are often not sure what is and is not allowed. Also, the state of Illinois did not anticipate the function of sales agents operating within the VGT market, and as such, they are not currently required to have a license. Closing this loophole to make sure all involved are required to have a license would bolster the integrity of the system. Lastly, he would like to see licenses for longer than one year (for example, renewal licenses could be for three or four years).

He recommends that Georgia consider providing ample funding to the chosen regulator so that it can do what it is necessary to operate efficiently and with integrity. He explained that initially, the IGB did not receive a funding increase, and it could have been done better if it had sufficient resources from the outset.

2. Master License Holders Recommendations

Mr. Paul Oeland, an Atlanta attorney representing United Gaming, gave a presentation in which he offered guidance for legislative changes. His presentation materials are attached to this report as Appendix VIII. He stressed the importance of having market-based solutions by looking at successes in other industries and in other states that encourage transparency.

Specifically, he referenced solutions that were brought about by a collaborative group of industry participants. These solutions included: allowing lawful economic incentives for obtaining and renewing contracts, which he differentiated from inducements; requiring uniformity of contracts; and improved resolution of contract disputes.

Additionally, Mr. Oeland referenced a previous conversation from the first meeting about fuel jobbers and the fuel market industry, and he recommended that similarly performance-based incentives be allowed in the COAM industry. He also referenced the extended contract periods allowed in both Illinois and Pennsylvania, and he recommended that Georgia join them in allowing longer contract terms.

Mr. Oeland also focused on criminalizing "bad behavior." Specifically, he wanted to see affirmative representations by licensees to the Georgia Lottery Corporation about the execution of contracts and renewals, and he believes that those representations should be the basis for criminal prosecution when illegal inducements are provided.

Mr. Oeland then focused on transparency. He would like to see disclosures for master licensees about incentives offered to location licensees. Additionally, he recommended significant requirements when applying for new or renewing licenses.

Later comments by Mr. Oeland revealed that interest in the industry by a private equity lender increased as a result of the Committee study committee showing interest in regulating the COAM and another private equity lender already in the market "doubled down" their commitment to stay in the market.

3. Location Licensees Recommendations

Mr. David Jaffer, an attorney representing the United C-Stores, gave a presentation offering recommendations for the future of the COAM industry. His presentation materials are attached to this report as Appendix IX. Specifically, Mr. Jaffer asked that the legislature allow for contract incentives and remove contractual roadblocks, such as the Nine-Month Rule. He explained that, although inducements are not allowed under current law, master license holders routinely provide inducements to enter into contracts but do not report it, creating serious tax and money laundering implications. He also explained that the Nine-Month Rule serves to protect those illegal inducements by the master license holders.

He also asked that the legislature protect the 45% of the revenue share that location licensees receive and make it so that it will not diminish in the future. He explained that, prior to 2013, location licensees were receiving 70-80 percent of the revenue but are now locked in to 45 percent. Previously, master license holders were sharing the work load of collection and accounting and that has all been shifted now to location licensees and the Georgia Lottery Corporation.

Alternatively, he proposed that location licensees could collect more than 45 percent in a number of ways. He proposed a few variables:

Location Licensee Share	Lottery Corporation Share	Master Licensee Share
60%	20%	20%
70%	10%	20%
45% plus incentives	20%	35% plus incentives

Mr. Jaffer expressed support of the Georgia Lottery Gift Card Pilot Program. He also asked that the 50/50 Rule be revised. He is concerned that a convenience store may not know toward the end of each month how much of their gross revenue receipts will be derived from COAMs versus other products. Mr. Jaffer recommended that this be changed from a monthly measurement to a quarterly measurement.

In response to Mr. Jaffer's comments, industry members of the committee pointed out that current returns from COAMs to location licensees, per square foot of their stores, are several times higher than in 2013.

4. Public Comment

Angela Holland, with the Georgia Association of Convenience Stores, spoke at the end of the meeting. She reiterated her statement from the previous meeting that the convenience stores would like any potential legislative changes to ensure that good actors in the system are not punished when attempting to punish the bad actors in the community. She also emphasized that convenience stores value autonomy in contract formation, and robust enforcement systems.

COMMITTEE RECOMMENDATIONS

While the Senate Study Committee on Coin Operated Amusement Machines does not propose legislation as a result of its study committee process, it does recognize that the following issues merit further attention and recommends the legislature consider the following recommendations, either in whole or in part.

Contracts

- Allow for longer contractual periods between master license holders and location licensees.
- Provide for continuity of contracts to help reduce number of ownership change applications made to the Georgia Lottery Corporation each year.

Gift Cards

- Support the implementation of the Georgia Lottery Gift Card Pilot Program in an effort to make informed decisions about potential uses and limitations of a similar permanent program.

Inducements

- Continue the prohibition and disfavored treatment of inducements.
- Provide criminal penalties for unlawful inducements.

Veterans and Fraternal Organizations

- Provide an exemption from the gross retail receipts rule to veteran organizations and fraternal organizations.

Enhanced Scrutiny

- Require greater financial and security background information when master license holders initially apply for and renew their license (in order to aid the Georgia Lottery Corporation in its administration and enforcement of laws).
- Change to a 3 year license period which would be administered on a rolling basis so that 1/3 of the industry would be up for renewal each year.
- Provide greater transparency by master licensees in the initial application for and renewal of master licenses in order to aid Georgia Lottery Corporation in its administration and enforcement of laws and regulations prohibiting inducements and other unfair methods of competition.

Enforcement

- Where practical, help local governments to enforce regulations on the local level.

Encouraging Innovation


- Support a competitive market that encourages continued innovation and investments in games, services, and new product development.
- Encourage future legislation that includes the ability to address and correct problems at any location without unfairly affecting other location.

Revenue Shares

- While the stakeholders in the industry have effectively represented their desire to maximize recovery, the Committee will make no recommendation at this time, except to agree that the Georgia Lottery Corporation should look for ways to increase its revenue.

Respectfully Submitted,

**THE FINAL REPORT OF THE SENATE COAM STUDY
COMMITTEE**



Senator John F. Kennedy – Committee Chairman
District 18