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SHAKOPEE, MN 55379  
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RUNNING ACES CASINO, RACETRACK, HOTEL LOCATION  
15201 ZURICH STREET NE, STE. 212  
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April 5, 2024

Running Aces Casino, Hotel and Racetrack  
Attention Taro Ito, President  
15201 Zurich St.  
Columbus, MN 55025

Canterbury Park Entertainment LLC  
Attention Randy Sampson  
1100 Canterbury Rd.  
Shakopee, MN 55379

Re: Request for Approval of On-Track Pari-mutuel Advance Deposit Wagering on Historical Horse Racing

**Via Electronic Mail**

Dear Mr. Ito and Mr. Sampson:

On January 4, 2024 you submitted a joint request for approval of on-track advanced deposit wagering on historical horse racing. The request asks for approval of 500 player terminals at Running Aces and 500 at Canterbury Park. The Racing Commission (Commission) received your request and a number of other documents and letters from interested parties regarding your request. The Commission held a properly noticed special meeting on April 1, 2024, to receive testimony, evidence and other documents. All interested parties were allowed to present testimony to the Commission.

At the close of testimony, the Commission deliberated on the matter, considering the testimony, evidence and other materials provided both at the meeting and materials submitted prior to the meeting. Among other things, the Commission considered whether this method of wagering was legal in Minnesota and done on a parimutuel basis.

The Commission concluded that the method of play did not constitute an illegal gambling device under Minn. Stat. § 609.75 subd. 4, finding that, although it uses a contrivance, that requires consideration and allows a participant the chance to win a thing of value, it is a system that relies principally on the skill of handicapping horse races rather than chance.

The Commission also considered whether the request constituted “parimutuel wagering” pursuant to Minn. Stat. § 240.01 subd. 14. The Commission concluded that, because the participants are paying into the same pool as other participants, and the pool is distributed to the winners, the system met the definition of parimutuel wagering.

At the conclusion of these discussions there was a motion for the Commission to approve the January 4, 2024, request for up to 500 terminals at each location for on-track advanced deposit wagering on historical horse racing, not to go into effect until May 21, 2024. The motion passed with five Commissioners voting in favor and one Commissioner voting against the motion. The Commission Chair did not vote, and the other two remaining Commission seats remain vacant.

Sincerely,

DocuSigned by:

*Camille McArdle*

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Camille McArdle, Chair

Minnesota Racing Commission

Cc: Kyle Gustafson, Executive Director, Minnesota Racing Commission