

Colorado Charitable Bingo Association  
2300 S Tejon Street  
Englewood, Colorado  
80110

The Honorable Jena Griswold  
Colorado Secretary of State  
1700 Broadway  
Suite 550  
Denver, Colorado. 80290

RE: Proposed Rulemaking for Bingo-Raffles

Dear Secretary Griswold,

The Colorado bingo/raffle market needs more tools to support Colorado Nonprofits. Bingo Strip Card Games legislation was passed in the 2022 legislative session. HB22-1093, "Concerning the conduct of charitable gaming activity, and, in connection therewith, modernizing the "Bingo and Raffles Law" to accommodate the use of improved electronic aids and devices in the conduct of games of chance". The prime sponsors, Rep. McCormick and Senator Zenzinger intended the legislation to help charitable gaming for licensees to enhance their revenue through a new and exciting game. It was not their intent to over regulate this new game to the point where no charity will include it in its session.

The Colorado bingo/raffle market has needs to modernize and respond to players requests for new and exciting games and more tools to support Colorado Nonprofits. Bingo Strip Card Games, as played in other markets, require higher occasion prize limits: \$10,000.00 minimum during any session. It is not unusual for Colorado bingo/raffle rules and regulations to allow higher limits. For example

Progressive Bingo - \$15,000.00  
Progressive Pull Tabs - \$5,000.00  
Progressive Raffle - \$15,000.00

Although Bingo Strip Card Game should be accounted for in the same manner as bingo, it is a category unto itself. Higher prize limits attract players. Different artwork and style of play sets Bingo Strip Card Games apart from conventional bingo cards. Multiple free spaces and the use of symbols in the playing grid, reduces session time, adds incentives to buy and is necessary to make Bingo Strip Card Games fun and profitable. In order for this new innovation to be successful in Colorado, prize limit and card design rules must be less restrictive. Prize limits for Bingo Strip Card Games need to be \$10,000 per occasion, \$1000 per game and the playing grid should be allowed to reflect the style of play that will make this new game successful.

As you know, since the start of limited gaming, sports betting, and other competitive gaming in Colorado, charitable bingo has suffered. Our attempts at modernizing bingo during the last two legislative sessions were met with fierce resistance from the casino lobby. If charitable bingo is to survive, we must be more proactive for charity. That means lifting restrictions that unnecessarily hamper charitable bingo fundraising. The best way to start is by amending these proposed rules to eliminate unnecessary regulation in favor of more flexibility for charities. I urge you to amend the proposed rules to eliminate these two restrictions and help Colorado charities raise more money for their many worthwhile charitable and community programs.

Thank you for your consideration.  
Richard Lemon  
President  
Colorado Charitable Bingo Association