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January 16, 2023

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

Dear Ms Griswold:

I am writing on behalf of Bingo Planet and the charities conducting Bingo located in Loveland and Greeley, CO. We are a Charitable Bingo Landlord licensee that works with multiple licensed charitable organizations in northern Colorado. I have been a Colorado landlord licensee for over thirty years; a founding member of the Colorado Charitable Bingo Association since 1998 in which I was President for over fourteen years; and a former board member of the Colorado Bingo Advisory Board from July 2013 until July 2021 and Chairman for four of those years. Over the past thirty years, I have been involved in the legislative passage and implementation of many statutory changes that have benefited the Colorado charitable bingo industry including electronic aided devices, progressive bingo games, event tickets and the formation of the Colorado Bingo Advisory Board. In the current tough economic times, increasing Bingo revenue is critical to these charities survival in a pro casino gaming and lottery atmosphere in Colorado.

During the last legislative session, we were pleased to see the Colorado legislature support charitable bingo by authorizing the use of bingo 'strip cards'. This form of bingo is popular in other parts of the country and has proven to be a very successful tool for charities to raise additional money with additional payouts per the approved legislation. We have been anxiously awaiting the effective date of the bill so that we could begin offering these games to our customers.

Unfortunately, upon review of the rules proposed by your office on December 15, 2022, your proposed rules are handicapping intended use of these new games passed by the Colorado legislature. I believe that your rules are defining 'strip cards' as a different type of paper bingo which would not have needed legislative approval. There are two sections of the proposed rules that cause us serious concern and undermine our ability to be successful. First, the amendments to rule 9.1.2 limit the prizes we can award in ALL bingo games, including bingo strip card games, to \$2000. This is completely unworkable and will effectively eliminate our ability to use bingo strip cards in our games. We need to be able to award separate prizes for bingo strip card games---up to the statutory maximum of \$1000 per game— to achieve the benefits intended by the new law. Because we must also offer traditional bingo at each session, the proposed rule will make it unworkable for us to offer any bingo strip card games.

Second, the proposed rules limit the number of free spaces on a grid to one. Again, this restriction will severely limit our use of bingo strip cards. Players need to bingo on all 5 grids on a strip card to win the game. Multiple free spaces on a grid make this possible in a reasonable amount of time and with the need to call fewer balls. It is our understanding that in other states where these types of games are successfully played, a grid averages about 3 free spaces, although the actual number can vary. One free space per grid, as proposed, will limit our ability to offer bingo strip card games because the time needed to play and complete a game will simply be too long.

Last, the Colorado Bingo Advisory Board was formed exactly for this situation so that the Secretary of State's office could get professional and informational advice from bingo operators and charities. In past years, prior to writing or making changes to rules, an Advisory Board meeting was scheduled to discuss the SOS proposed language to have discussion and get feedback from industry representatives. These meetings insured that the entire industry was represented and created open dialogue for the SOS office to explain their intentions and for bingo representatives to educate and advise improvements needed. There has not been a meeting in almost four years and I do not believe the proposed rules were written with any industry representation or input to educate the SOS as to how strip cards are intended to be played. I urge you to schedule an Advisory Board meeting as soon as possible to discuss the strip cards prior to

implementing these strip card rules. Quarterly meetings are needed more than ever so Colorado Bingo is properly represented.

In the past several years, as you are aware, bingo proceeds have declined. We are not drawing as many customers, and we need something new to bring in players and generate excitement. Bingo Strip Cards, as passed by the legislature, would be an added bonus to charitable bingo income. Sadly, the rules proposed by your office with the above restrictions in place, do not allow it to be played as the Colorado Legislature approved resulting in the continued demise of the charitable bingo industry. Again, your proposed rules make a great potential money maker into just another type of bingo paper sheet that will not increase charitable bingo income. Passage of your proposed rules kills any increased income which is contrary to the state legislature's intentions in the passage of Strip Cards to increase income to the charities. Please modify the proposed rules to (1) take bingo strip card prizes out of the \$2000 session prize limit; and (2) allow multiple free spaces on a bingo strip card grid.

If you have questions, please feel free to call me at [REDACTED]

Sincerely,

Donivon D. Glassburn