



January 11, 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 the Colorado Charitable Bingo Association. The association represents licensees, hall owners, suppliers and manufacturers. Bingo revenue is critical to our members survival and instrumental in allowing them to support their charitable mission.

During the 2022 legislative session we introduced legislation to permit strip bingo cards, as well as, increasing the number of faces permissible each 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 money. Our members have been anxiously awaiting the effective date of the bill so that they could begin offering these games to their customers.

In addition, we are curious as to why the “Bingo Advisory Board” was not consulted on the rules being proposed.

Upon review of the rules proposed by your office on December 15, 2022, we believe that the benefits we hoped to achieve with bingo strip cards will not be realized. 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 members can award in ALL bingo games, including bingo strip card games, to \$2000. This is completely unworkable and will effectively eliminate their ability to use bingo strip cards in their games. Members 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 they must also offer traditional bingo at each session, the proposed rule will make it unworkable for them 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 their 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 their ability to offer bingo strip card games because the time needed to play and complete a game will simply be too long.

In the past several years, our members bingo proceeds have declined. Members are not drawing as many customers, and they need something new to bring in players and generate excitement. Our hope was that bingo strip cards would help. Sadly, the rules proposed by your office with the above restrictions in place, will not give us the boost that they need. 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,

Corky Kyle, MPA, CAE  
Executive Vice President  
Colorado Charitable Bingo Association