

Andrea Gyger

From: Karl Gills <[REDACTED]>
Sent: Thursday, December 20, 2012 9:50 AM
To: SoS Rulemaking
Cc: Shannon Bee
Subject: Comments on Proposed Changes to Bingo/Raffle Rules
Attachments: Text of e-mail regarding dist meeting raffle.doc

Greetings,

I am the Games Master for the Rotary Club of Steamboat Springs and write to comment on the proposed rules changes to be heard at the January 15, 2013 rule making hearing.

My comment is in support of the proposed change in Rule 8.1.4 (formerly Rule 9.0.A.4) regarding requirements for special raffle procedures. I agree that it would be much more workable to increase the threshold for special procedures to \$1000 per item rather than \$1000 total value.

A specific example of how this would remove a regulatory burden for our club follows. Each year a local Rotary Club hosts a district conference attended by several hundred people representing nearly 50 clubs. Each club is asked to bring a "gift basket" of nominal value from their club to be raffled. The proceeds then go to a charity in the local community of the host club. These "gift baskets" are brought with the attendees and the actual gift is not known before a couple of days before the raffle. If each club brings a "gift basket" valued at \$30 and 40 clubs bring baskets, the total value exceeds the \$1000 threshold, however it is near impossible to accommodate the procedures required for total raffle value of more than \$1000.

This type of raffle, to whom tickets are only sold to conference attendees, is much more conducive to a "bucket raffle" than anything requiring the special procedures of high value raffles.

Attached to this comment is the e-mail text that I recently sent to the License Administrator asking for assistance in this very situation.

I appreciate the concern of the Secretary of State, but feel that allowing for a focus on individual value is an important change. Possibly a maximum value could be retained, but raising it to a higher amount would address the problems identified by the organizations conducting raffles.

Thank you for considering my comments.

Karl Gills, Games Manager
Rotary Club of Steamboat Springs

The Rotary Club of Steamboat Springs, 2012 license number 04958, will host the District Rotary Conference in June of next year. We plan an event as part of the conference that has some unique challenges.

Approximately 40 clubs will be represented at the event and a total attendance of 200 to 250 is anticipated. We are asking each club to bring an item that represents their community for "raffling" The value of these items is generally less than \$50 each. Attendees of the clubs bring these items with them to the meeting, so we don't know what the clubs will bring prior to their arrival for the event.

At one of the dinners associated with the conference, Rotarians and Rotary International Exchange Students will rotate through the dining room and sell tickets to diners. The tickets are then put in a container and drawn for each prize. Tickets will cost \$1 or \$2 each and some type of discount for multiple ticket purchases may be offered, such as 12 for \$10, if \$1 is the individual ticket price.

At similar conferences, this has been done with the simple "theater ticket" type of system as it is not conducive to preprinting tickets with prizes listed.

Proceeds of the event will go to a local non-profit organization to support their work in the community.

No cash prizes are offered.

Ticket sales are not made available to the public, only to those attending the event and are sold only at the dinner event.

Prizes are on display at the dinner event.

We would like to proceed on the same basis as this has been done at previous events in other communities. That is to use the numbered theater ticket type of ticket for the event. If we have to print special tickets for this raffle, it will take a significant chunk of the proceeds, given the small ticket price.

My questions are:

1. Will this require the process identified for raffles where the total prizes awarded exceed \$1000? Is a waiver possible?
2. If no waiver is available, given the nature of how prizes arrive at the event, can you provide guidance as to how we should handle printing of the special tickets since we will not know the specifics of each prize in advance?

If you have questions or require clarification, please feel free to contact me by e-mail or at [REDACTED].

Karl Gills