

**From:** [Karen McCormick](#)  
**To:** [SoS Rulemaking](#); [John Magnino](#)  
**Subject:** [EXTERNAL] Bingo and Raffle Rulemaking comments  
**Date:** Wednesday, January 4, 2023 4:16:29 PM

---

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

RE:Proposed Rulemaking for Bingo-Raffles

Dear Secretary Griswold:

During the 2022 legislative session, I was the chief sponsor of HB22-1093, a bill that was passed by the legislature and approved by the Governor. The intent of this new law was to give charitable bingo organizations an opportunity to offer a new type of bingo game unfettered from the restrictions on traditional bingo. The goal was to maximize the benefits bingo strip cards have for charities. To accomplish this, we intentionally set the prize limit at \$1000 per bingo strip card game and we did not limit the number of bingo strip card games an organization can offer during a bingo session. This compromise was reached and agreed upon by both charitable gaming interests and the gaming/casino industry.

The rules proposed by your office on December 15, 2022, contain certain restrictions that undermine what the law was intended to accomplish. Particularly concerning are new rule 1.2 and the amendments proposed to rule 9.1.2. I am requesting that both be modified for the reasons detailed below.

New rule 1.2 limits a bingo strip card to one "free space" in each grid. Such a restriction is not mandated by the statute nor was it intended by the bill. Bingo strip cards are played so that a player must achieve a bingo on all 5 grids to win the game. This can only be done in a reasonable amount of time if each card is allowed to contain multiple free spaces. The average number of free spaces per grid on a bingo strip card is about 3, usually denoted by an entertaining symbol. Limiting the card to one free space per card will unnecessarily prolong each game and therefore, limit the number of bingo strip games that can be played during one occasion. This will hamper play, diminish player excitement, and result in less revenue for charity. I don't understand the reason behind suggesting this rule. Again, the gaming/casino industry agreed to the language in the bill which purposely did not limit free spaces to "one".

The proposed amendments to rule 9.1.2 restrict the total bingo strip card prizes that may be paid by including bingo strip card games in the cumulative prize limit of \$2000. This limitation on prizes is not required by statute, nor is it consistent with the bill authorizing the games. We specifically set the bingo strip card prizes at \$1000 per game to allow charities to maximize the use of this form of bingo. Our intent was not to limit the games to the overall occasion limit. Restricting bingo strip card prizes to the cumulative prize limit of \$2000 effectively eliminates the benefit to the charities that we intended to provide. And again, the gaming/casino industry agreed to the language and intent of the bill. Please amend rule 9.1.2 to remove bingo strip card prizes from the cumulative occasion prize limit.

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.

*KAREN MCCORMICK, DVM*  
*State Representative House District 11*  
*Chair of Agriculture, Livestock and Water Committee*  
*Member Health and Insurance Committee*  
*Member Appropriations Committee*  
200 E. Colfax, Rm 307  
Denver, CO 80203  
Capitol: 303-866-2780  
E-Mail: [Rep.KarenMcCormick@gmail.com](mailto:Rep.KarenMcCormick@gmail.com)  
[karen.mccormick.house@state.co.us](mailto:karen.mccormick.house@state.co.us)