From: Nikolay Dobrinov
To: SoS Rulemaking

Subject: [EXTERNAL] Bingo Strip Cards Legislation **Date:** Thursday, January 12, 2023 7:56:18 PM

Attachments: <u>StripCard SOSRuleMaking.docx</u>

Dear Secretary Griswold,

please take into consideration our request for less restrictive regulation for Strip Card games. We are a non-profit that finances more than 70% of our budget by running bingo sessions. It is getting harder and harder to make money, while we still provide the same amount of resources from our members. Clients mostly come to play on 'Must-go" sessions where we are giving away a large jackpot. It is hard to attract players with the \$2000 per session/occasion limits that are currently in place. People just do not come in the same numbers as expected, and if we are running into a recession this year things will get even worse.

We need your help to survive as a team.

Thank You

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Nikolay Dobrinov

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 and new and exciting games. 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 to support their programs that benefit their community.

Although Bingo Strip Card Game can 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.

Sincerely,

Nikolay Dobrinov

Bingo Chair Rocky Mountain Splash