



## Arrow International, Inc.

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January 23, 2023

Honorable Jena M. Griswold  
State of Colorado  
Department of State  
1700 Broadway, Suite 550  
Denver, CO. 80290

Thank you for the opportunity to provide additional commentary on the proposed rules governing Bingo Strip Cards. As I mentioned at the public hearing, bingo strip cards can provide a benefit to Colorado charities by offering a new and exciting way to play the game of bingo. Bingo strip cards are legal in six other states, as well as Canada, and we anticipate growth into other states in the near term. Charities operating bingo were hit particularly hard during the pandemic. Bingo halls were closed for long periods of time and even after reopening, crowds have been slow to return. Bingo strip cards, with entertaining graphics and a slightly faster pace, provide an alternative to traditional bingo, which drives attendance and sparks new interest in the game.

As you saw from the samples I left with you at the hearing, bingo strip cards contain a standard grid for players to daub as bingo balls are called. Each strip contains up to 5 (some as few as 3) cards for players to use in a game. A player must bingo on all cards in the strip to win the game. Most cards, but not all, contain at least one free space; some have more than one. The free spaces are designed to create excitement in the game. Free spaces are usually identified by a fun graphic consistent with the theme of the game. Not all cards have the same number of free spaces, but because all the cards are covered until purchased, part of the appeal of the game is getting a card with more free spaces than others. This does not give the player an “advantage” as the game is still determined by the balls that are called. Ultimately, players have the same chance of winning.

Bingo strip cards are easily regulated as each set of cards has a form number and each card in the set has a serial number. Individual cards are also identified as “A”, “B” “C” etc. for prize verification purposes. These features provide a charity with the ability to track all cards in use and allow for secure inventory management.

As others testified, and as Rep, McCormick indicated in her letter to your office (as posted in the comment section), the intent of HB 1093 was to offer charities a new type of



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bingo card to help stimulate bingo attendance and charity proceeds. The law set a separate prize limit of \$1000 per game (strip of cards) that was not intended to fall under the \$2000 traditional bingo prize cap. This is consistent with our experience in other states; separate prize limits are essential to making the game successful.

Accordingly, please amend the proposed rules as follows:

a. Rule 1.2:

“Bingo Strip Card” means a strip of up to five connected paper bingo cards with each card containing a concealed grid of preprinted numbers ranging from one to seventy-five as specified in section 24-21-602(5.5), C.R.S. ~~“Symbols cannot be used in the grid. Each grid may contain no more than one free space.”~~

b. Rule 9.1.2:

Maximum game prizes. (a) Except as provided in Rule 9.1.2 (b) Licensees may award any amount as a prize for any single game of bingo so long as the total value of prizes offered at the bingo occasion does not exceed \$2000.

(b) Licensees may award up to \$1000 for any single game of strip card bingo, so long as the total value of prizes offered at the bingo occasion for strip card bingo does not exceed \$15,000.

Both these changes are critically necessary to make bingo strip card games work in Colorado. Failure to change the proposed rules will make bingo strip card games impossible to conduct with any degree of success. We anticipate that most charities will simply not even try. Changing the proposed rule as suggested gives effect to the intent of the legislature, which overwhelmingly approved the law, and offers Colorado charities the opportunity to recover from the harsh results of the pandemic and succeed in their important fundraising efforts

Again, thank you for the opportunity to comment on the proposed rules. Please feel free to contact me if you have any questions or if I can provide any additional information.

Very truly yours,



Mary B. Magnuson

