

Andrea Gyger

From: Sara Hall <Sara.Hall@stjude.org>
Sent: Monday, January 14, 2013 3:07 PM
To: SoS Rulemaking
Subject: Written Comments: Bingo/Raffle Rulemaking 1/15/13
Attachments: 01142013 ALSAC SJCRH Comment Regarding Bingo & Raffle Games.pdf

Greetings. I am attaching the written comments to the Bingo/Raffle Rulemaking, 1/15/13, 8 CCR 1505-2 from ALSAC, the fundraising organization that supports St. Jude Children's Research Hospital. I will be in attendance tomorrow at the hearing and will be prepared to speak in support of proposed Rule 8.1.1(E) as set forth in the attached letter. We appreciate the opportunity to comment that this rule making process affords us and the professionalism and assistance the Secretary of State provide to charities.

Sincerely,
Sara

Sara L Hall
Chief Legal Officer/General Counsel
ALSAC, the fundraising organization that supports St. Jude Children's Research Hospital
501 St. Jude Place
Memphis TN 38105
(901) 578-2007



January 14, 2013

Scott Gessler
Colorado Secretary of State
Blue Spruce Conference Room, 2nd Floor
1700 Broadway
Denver, CO 80290

Re: Comment regarding Rules Concerning Bingo and Raffles Games, 8 CCR 1505-2

Dear Mr. Gessler:

I am writing on behalf of ALSAC, the organization that raises funds and awareness for St. Jude Children's Research Hospital, in support of the revised proposed Rules Concerning Bingo and Raffles Games, 8 CCR 1505-2, particularly proposed Rule 8.1.1(E) submitted by the Office of the Colorado Secretary of State.

St. Jude Children's Research Hospital, founded by the late entertainer Danny Thomas, is one of the world's premier centers for the research and treatment of pediatric cancer and other deadly childhood diseases. Children from all 50 states, including Colorado, and from around the world come to St. Jude each year for treatment. St. Jude shares its research discoveries from our laboratories to patients and doctors everywhere, so one child saved at St. Jude means thousands more saved worldwide. No family ever pays St. Jude for anything. Through the generosity of donors across the country and in Colorado, we are able to pay not just for treatment but also for airfare, residential housing and meals for patients and families at St. Jude.

Since 1972, ESA has helped raise more than \$164 million in cash and pledges for the kids of St. Jude. Founded in 1929, Epsilon Sigma Alpha (ESA) is an international leadership and service organization. Members of ESA are among St. Jude's most dedicated and hard-working volunteers. ESA is headquartered in Fort Collins, Colorado with 506 members and 44 chapters across the state. The State of Colorado should certainly be proud that such a distinguished service organization and such civic-minded citizens call Colorado home.

Across the country, the St. Jude Dream Home Giveaway is one of the largest single-event fundraisers for St. Jude nationwide and has raised more than \$224 million with approximately 25 Dream Home raffles each year. Thanks to our wonderful ESA partners, whose volunteers are instrumental in Dream Home raffles across the country, we expanded our Dream Home Giveaways to Colorado with a dedicated ESA International Colorado State Council holding the raffle license. For the purchase of a \$100 raffle ticket, Colorado residents are entered to win a Dream Home or other prizes. The 2011 and 2012 Dream Home campaigns raised over \$2,000,000 for the children of St. Jude.

Under the current Rules Concerning Bingo and Raffles Games, only licensee volunteers who do not receive remuneration from the licensee for selling tickets may sell raffle tickets. The proposed rules, if approved, would allow an exception for licensees to contract with call fulfillment centers to process raffle ticket orders. We support the proposed rules as it provides

greater opportunity for charities, regardless of their size, to ensure Payment Card Industry (“PCI”) compliance and best practices and protect the security of donor data through having the option to hire call center professionals to receive incoming calls from ticket purchasers and process ticket-purchaser information.

As you are aware, current PCI regulations set forth requirements and best practices to be used when handling credit card information. Likewise, many nonprofits have developed additional processes to ensure that donor personal information is secure and remains confidential. While those ESA volunteers who handle credit cards for the Colorado Dream Home receive training and are long-term educated volunteers, it is not feasible for volunteers to provide twelve hour call center availability with English and Spanish language capabilities and ensure that every volunteer has received PCI and other call center best practices training.

Because call fulfillment centers are required to maintain PCI compliance, their employees have passed requisite background checks, are properly monitored to ensure that no theft of funds, credit cards, identity or other data occurs and are trained in PCI compliance and procedures to ensure that data is secure. Further, call fulfillment centers can more easily staff the long and evening hours that provide more opportunities for tickets to be purchased and staff the lines with bilingual representatives.

Volunteer license holders for charity raffles in Colorado have a significant responsibility and time commitment in conducting the raffle. Allowing these license holders to contract with call fulfillment centers enables them to outsource a highly regulated component of the raffle, the taking of incoming calls from ticket purchasers, which provides added protection to Colorado residents and their identity and credit card information. For all these reasons, we support proposed Rule 8.1.1(E) to the proposed Rules Concerning Bingo and Raffles Games, 8 CCR 1505-2.

In closing, we want to thank the State of Colorado for its support of charitable organizations, including the children of St. Jude Children’s Research Hospital and ESA. We certainly want to express our sincere gratitude for the professionalism, expertise and assistance that the Secretary of State and its offices have shown our organization. In particular, we want to thank Mike Hardin, Director, and Brian Gryth, Manager of Business & Licensing Division; Greg Lestikow, Non-Profit Programs Manager and Shannon Bee, Licenses, for working with ESA, St. Jude and ALSAC and allowing us to raise the funds necessary to support the children and families who come to St. Jude Children’s Research Hospital for life-saving treatment and care.

Sincerely,



Sara L. Hall
Chief Legal Officer, ALSAC