

Harns, Wendy B. (MGCB)

From: Andrew Sokol <andrew.k.sokol@gmail.com>
Sent: Wednesday, January 5, 2022 10:23 AM
To: MGCB-Rules
Cc: Andrew K. Sokol
Subject: Comments on the Fantasy Contest Rules introduced on November 23, 2021
Attachments: AKS VENTURES MGCB Letter.01052022.pdf

Categories: Red Category

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Ms. Harns,

Please review and share the attached comments regarding Daily Fantasy Rules changes in Michigan.

Please also confirm receipt.

My best,

Andrew





January 5, 2022

Ms. Wendy Harns
Michigan Gaming Control Board
P.O. Box 30786
Lansing, MI 48909
Via E-Mail: MGCB-Rules@michigan.gov

Dear Ms. Harns:

As a consultant to the Daily Fantasy Sports (“DFS”) and Sports Wagering industries, having worked with most of the top operators in the space, including recognizable brands such as DraftKings, FanDuel, and The Score among others, I would like to thank you, the Department of Treasury, and the Michigan Gaming Control Board for the opportunity to provide comments on the Fantasy Contest Rules introduced on November 23, 2021.

For more than 50 years, millions of Michigan residents have enjoyed playing traditional season-long fantasy sports. Virtually every level of every sport - from professional football to college basketball and international soccer - has given rise to some form of fantasy contests, in which friends, neighbors, coworkers, and even strangers enhance their enjoyment of the sport by competing against one another for prizes in organized leagues to determine who has the skill—akin to a general manager of a sports team—to put together the most successful fantasy team.

Since 2019, hundreds of thousands of Michigan residents have also enjoyed DFS contests—the same fundamental game as season-long fantasy sports contests, but played over a shorter timeframe, and therefore requiring even more skill.

Essentially, all fantasy sports models of gameplay -- including prop selections -- are contests of skill. The participants in fantasy contests act as general managers of their fantasy teams, and in that capacity, they utilize their skill and knowledge of the sport, as well as the individual athletes in order to master complex econometric and statistical concepts—allowing for the optimum fantasy roster selection of real world athletes using rules applicable to these fantasy sports.

Accordingly, the contest winners are those who -- using their skill -- are rewarded based on the statistical performance of those respective athletes in real-world sporting events. The results are never dependent on the outcome of any one game or the performance of any one athlete in any actual game.

An important point I wanted to emphasize -- that any DFS game is a contest of skill is now beyond credible dispute. To my knowledge, every statistical and economic expert who has studied DFS games has concluded that their outcomes depend on skill, not chance. Indeed, one leading University of Chicago statistician, Zvi Gilula, put it more bluntly, calling chance “overwhelmingly immaterial” to the outcome of DFS contests. This is why, time after time, the most skilled DFS contestants win the lion’s share of prizes. **That is the definition of a skill-based game.**



In this regard, prop selection-based contests are no different from the many other contests beloved by Michigan residents, such as bass fishing, curling, stock picking, and even beauty pageants, all of which involve participants paying entry fees and then using their wits and skills to try to win a prize. While every contest theoretically may be affected by some degree of chance—the mood of the fish, the weather conditions, the temperature of the ice, the fickleness of the stock market, and the subjective preferences of the judges—skill ultimately controls outcome. Therefore, like DFS, they are all contests of skill, and all legal and permissible under Michigan law.

Rules banning legal DFS activity, and more importantly, prop selection-based contests, will have a negative effect on the small operator, and will be in direct conflict to the stated objective of the Michigan Gaming Control Board in promulgating rules that are consistent and work in conjunction with other states. Should the Board take this arbitrary stance on prop selection-based contests, many qualified operators may be discouraged from seeking licensure, have their applications rejected, or simply leave the state due to inconsistency of regulation. It is important to note here that the interpretation of the rules can be expanded to apply to traditional fantasy sports contests, and not just prop selection-based contests, under the broad definition outlined in the Michigan Fantasy Contests Consumer Protections Act of 2019. Such interpretations could have the inadvertent effect of restricting fantasy sports operators, as a whole, indiscriminately in the entire sector.

As the Board considers these new rules, I implore each member to consider that any decision will have nationwide ramifications as Michigan is a leading DFS market, and other states are watching. If these rules are passed, many Operators may be forced, or choose to, exit Michigan leaving hundreds of thousands of Michigan residents unable to participate in the daily fantasy sports games they have enjoyed for so many years.

Thank you again for the opportunity to provide my opinion on this matter.

Sincerely,

A handwritten signature in black ink that reads 'AKSokol'.

Andrew K. Sokol
President & CEO
AKS Ventures, LLC
Email: andrew@aks.ventures
M: 404.395.2357

Harns, Wendy B. (MGCB)

From: MGCB-Rules
Sent: Tuesday, January 4, 2022 2:04 PM
To: Murley, David (MGCB); Hicks, David (MGCB); Negin, Charles (MGCB)
Cc: Harns, Wendy B. (MGCB)
Subject: FW: Bally's Public Comment on Administrative Rules for Fantasy Contests
Attachments: Ltr to MGCB from Bally's signed.pdf

Comments from Bally's regarding the proposition ban.

Charlie Negin, Manager
Indian Gaming Section
Michigan Gaming Control Board
P.O. Box 30786
Lansing, MI 48909
(517) 241-5672
Email: neginc@michigan.gov

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From: Elizabeth Suever <ESuever@ballys.com>
Sent: Tuesday, January 4, 2022 1:58 PM
To: MGCB-Rules <MGCB-Rules@michigan.gov>
Cc: Mike Malane <malane@midweststrategy.com>
Subject: Bally's Public Comment on Administrative Rules for Fantasy Contests

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Good afternoon,

Attached please find Bally's Corporation's comments on the Administrative Rules for Fantasy Contests. If Bally's can be of further assistance, please reach out to me or our lobbyist, Mike Malane, copied here.

Thank you,

Elizabeth

Elizabeth Suever

Vice President, Government Relations | Bally's Corporation
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Members of the Michigan Gaming Control Board:

In response to the Fantasy Contests draft rules published on November 23, 2021, Bally's Corporation respectfully requests the following provision is removed from the draft rule set before sending the Joint Committee on Administrative Rules:

Under *Part 3: Conduct of Fantasy Contests, Rule 531, subsection 3(b)* "Proposition selection or fantasy contests that have the effect of mimicking proposition selection." This language was seemingly pulled directly from a rule set in the state of Ohio that was a result of that specific language being contained in that state's statutory definitions of fantasy contests. Here in the state of Michigan, the legislature did not include such language, even though it was well known to have passed in Ohio at the time Michigan was debating the final passage of the state's gaming laws.

It is our belief that this language is made wholly unnecessary given the differences in approaches to gaming between the states of Ohio and Michigan. Given the fact that as a state Michigan has decided to legalize those forms of betting, we do not see the need to outlaw a fantasy game that resembles them. While it is clear that daily fantasy contests should not be permitted to mimic a wager on the outcome of a sporting match or game, daily fantasy sports in its essence are a form of gaming based on individual athletes' statistical output in a given contest. Thus, a fantasy contest based on the statistics of individual players should be permitted.

We also believe that leaving in this provision would go against the ultimate goal of passing this legislation: the mainstreaming and permitting of market access to good actors in the gaming space. Without the removal of this language, the Michigan Gaming Control Board would severely limit Bally's ability to operate in this state, further consolidating market share amongst only the largest fantasy sports operators.

We appreciate your attention to this matter and look forward to working together toward an amicable compromise.

Regards,

Elizabeth Suever
Vice President, Government Relations
Bally's Corporation

Harns, Wendy B. (MGCB)

From: Christopher Cipolla <ccipolla@draftkings.com>
Sent: Thursday, January 6, 2022 4:51 PM
To: MGCB-Rules
Cc: Kevin Cochran
Subject: DraftKings Comments to Proposed Administrative Rules for Fantasy Contests
Attachments: DraftKings - Comments to Proposed Fantasy Contests Rule Set (Submitted 1-6-2022).pdf

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Dear Ms. Harns,

Attached please find comments prepared by DraftKings in connection with the proposed administrative rules for fantasy contests. DraftKings appreciates the Board's consideration of our comments and we would be happy to discuss the contents of the submission if the Board requires any further information or clarification.

Thank you again and have a nice evening.

Regards,

Christopher Cipolla
Director, Legal and Government Affairs
DraftKings Inc.
914-557-6820





January 6, 2022

Via E-Mail: MGCB-Rules@michigan.gov

Michigan Gaming Control Board
3062 W. Grand Blvd, #L700
Detroit, Michigan 48202
Attn: Mr. David Murley, Deputy Director

Re: Proposed Changes to Fantasy Contests Rule Set

Dear Deputy Director Murley:

Following receipt of the Michigan Gaming Control Board's ("Board") notice of public hearing to receive public comments on proposed changes to the fantasy contests rule set, DraftKings Inc. ("DraftKings") submits the following comments for the Board's consideration. As a leading fantasy contest operator in the United States, DraftKings has first-hand experience with a wide range of fantasy contest regulatory frameworks, and submits these comments based on its operational knowledge in regulated markets throughout the country.

R 432.532d Fantasy contest self-restriction program.

(6)(c) Prevent a fantasy contest player from removing or reducing the severity of a notification or self-imposed limit ~~with less than~~ within 24 hours' ~~notice~~ of setting the limit.

DraftKings respectfully requests amending this provision to allow the changing of such limits promptly upon request rather than waiting 24 hours to implement the requested change so long as the customer is not in a blackout period which would prohibit such changes. For example, if someone sets a daily limit, DraftKings believes the rule should prevent a customer from changing the limit within the first 24 hours, but if they choose to remove the limit a week later DraftKings should allow the customer to do so without a 24-hour notice period.

R 432.534 Bank secrecy act compliance.

DraftKings respectfully requests striking references to the Bank Secrecy Act in full. The Bank Secrecy Act does not apply to fantasy contests. Additionally, the following rule, R 432.534a, covers similar, applicable types of concerns applicable to fantasy sports.



R 432.541a Age and identity verification.

(1) A fantasy contest operator or licensed management company must verify an individual's age and identity before allowing that individual to create a fantasy contest player account and make a deposit or enter or participate in a fantasy contest.

3. Third-party service providers may be used for age and identity verification of an individual attempting to create a fantasy contest player account and make a deposit or enter or participate in a fantasy contest.

DraftKings respectfully requests clarification on when an operator must verify an individual's identity. DraftKings is interpreting these requirements to necessitate verification of a player's age and identity at one of the following two instances, as determined by the fantasy contest operator:

1. When the individual creates a fantasy contest player account and makes a deposit; or
2. When an individual creates a fantasy contest player account and enters or participates in a fantasy contest.

R 432.544 Fantasy contest player account requirements.

To establish a fantasy contest player account, a fantasy contest operator or licensed management company must do all of the following:

(a) Create an electronic fantasy contest player file, which must, at a minimum, include the following:...

(i) The fantasy contest player's full or legal name.

DraftKings respectfully requests the process for, and types of information captured during account creation be amended to allow fantasy sports contest operators to capture a "player's full name" instead of a "player's legal name." A player providing their "full name" (such as "Mike Smith") upon account creation must still undergo identity verification through a third-party provider in order to make deposits or enter contests, and the full name provided will be verified using public records that may include the associated legal name ("Michael Smith"). Conversely, if a player cannot be identified through the information provided to the identity verification service provider, additional information is requested from that player, including forms of identification like a driver's license which disclose legal name. Since use of a full name does not compromise the integrity of age and identity verification measures, responsible parties should be able to establish and maintain accounts using a customer's "full name" to facilitate ongoing customer communications rather than mandating that the account be established and maintained using a



formal legal name. By making this minor change the board will adopt the industry standard currently used across the country, and for example was recently adopted by the Arizona Department of Gaming. See, [R19-4-216.D.1](#).

R 432.551 Fantasy contest operator and licensed management company procedures and internal controls.

(1) A fantasy contest operator and any licensed management company that manages day-to-day fantasy contest operations of the fantasy contest operator must submit to, and receive approval from, the board commercially reasonable ~~procedures and~~ internal controls intended to accomplish all of the following:

(f) Prevent the owners, directors, employees, agents, contractors, and third-party providers of the fantasy contest operator or licensed management company from sharing protected information with third parties unless the protected information is otherwise made publicly available in accordance with R 432.532g. ~~The procedures must include the means by which a fantasy contest operator or licensed management company will provide notice to a fantasy contest player related to the sharing of protected information that includes the fantasy contest player's personal identifiable information.~~

(g) Ensure the security of personal identifiable information and financial information of a fantasy contest player, funds in a fantasy contest player account, and other information as required by the board. ~~The procedures must include the means by which a fantasy contest operator or licensed management company will provide notice to a fantasy contest player related to the sharing of personal identifiable information.~~

DraftKings respectfully requests striking the requirement to have internal procedures reviewed and approved. Only a few states require the submission of fantasy contest internal controls for approval, and no other state requires the submission of procedures. Many of the issues detailed in this section do not currently have a documented procedure in place and it would create a significant operational burden to create them specifically for Michigan. Much of this information is already found in existing documents such as an operator's Terms of Service and Privacy Policy. DraftKings respectfully submits that the fact we are operational and successful in 45 states today demonstrates that existing measures are sufficient to address the issues raised in this section and we respectfully request that the Board consider documents such as the Terms of Service and Privacy Policy to satisfy requirements relating to procedures.

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(i) ~~Ensure compliance with all applicable provisions of the bank secrecy act of 1970, 31 USC 5311 to 5332, and R 432.534.~~



DraftKings respectfully requests removing subsection (i) in its entirety for the same reasons outlined in its comments to R. 432.534.

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(4) Unless otherwise determined by the board, all of the following provisions apply to technical adjustments and amendments to the ~~procedures and~~ internal controls:

(a) A fantasy contest operator or licensed management company must notify the board in advance of making any technical adjustment to its ~~procedures and~~ internal controls. The technical adjustment may be implemented immediately if it is not material and ~~the procedures and~~ internal controls continue to meet or exceed standards required by the act and these rules. If at any time the board determines that the technical adjustment is material, the fantasy contest operator or licensed management company must do either of the following:

(i) Submit the material technical adjustment to the board in accordance with subdivision (b) of this subrule. The fantasy contest operator or licensed management company must not implement the material technical adjustment until it is approved by the board under subdivision (b) of this subrule or allowed to be implemented under subdivision (c) of this subrule. If the material technical adjustment was previously implemented, the material technical adjustment may remain in effect during the pendency of the submission unless otherwise directed by the board.

(ii) Withdraw the material technical adjustment. If the material technical adjustment was previously implemented, the fantasy contest operator or licensed management company has 15 days to cease implementation.

(b) Except as otherwise provided in subdivision (c) of this subrule, all material technical adjustments and amendments to the ~~procedures and~~ internal controls must be submitted to and approved by the board, in writing, ~~prior to implementation.~~

(c) If within ~~15~~ days, the board has not approved, denied, or otherwise provided written notice regarding a material technical adjustment or amendment to the ~~procedures and~~ internal controls, a fantasy contest operator or licensed management company may implement the material technical adjustment or amendment, as submitted, with the board retaining its authority to require further amendment, approval, or denial.

(d) If the board requests additional information, clarification, or revision of a proposed technical adjustment or amendment to the ~~procedures and~~ internal controls and the fantasy contest operator or licensed management company fails to satisfy the request within 30 days, the board may consider the proposed technical adjustment or amendment withdrawn. If the technical adjustment or amendment was previously implemented under subdivision (a) or (c) of this subrule at the time it is considered withdrawn, the fantasy contest operator or licensed management company has 15 days to cease implementation of the technical adjustment or amendment. If the fantasy contest operator or licensed management company subsequently wants to implement or seek board approval of the proposed technical adjustment or amendment, the fantasy contest operator or licensed management company must resubmit the notification or request.

DraftKings respectfully requests that references to procedures be removed for the same reasons



identified in comments to R. 432.551(1) above.

Further, DraftKings respectfully requests the timeframe for the Board’s review be shortened from 15 days to 5 days in subsection (c) to align with similar reviews in other jurisdictions. For example, Arizona has a similar provision in its fantasy sports rules and has adopted a five-day response window that has proven workable and successful. See, [R19-4-207.C.2](#). Fantasy sports contest operators make minor changes frequently and requiring testing and approval for material changes by one state regulator 15 days out is not tenable. Fantasy sports contests operators need approval and turn around within a few days, or risk delaying changes that may be necessary.

R 432.554 Independent audit

(1) By July 1 of each year, or a later date if approved by the Board, a fantasy contest operator and any licensed management company that manages day-to-day fantasy contest operations of the fantasy contest operator must contract with an independent certified public accountant to perform an independent audit, in accordance with generally accepted accounting principles, of the financial condition of the fantasy contest operator's and licensed management company's total operations for the previous fiscal year and assess the fantasy contest operator's and licensed management company's compliance with R 432.535a and section 14 of the act, MCL 432.514

DraftKings respectfully requests the audit requirement allow the Board to consider extending the date for which a fantasy contest operator and licensed management company must contract with an independent certified public accountant to perform an independent audit. The foregoing modification does not jeopardize any of the public policy goals in obtaining timely information but does allow the Board discretion to account for situations that arise where an operator may reasonably request an extension to satisfy its obligations.

* * * * *

Thank you for your consideration of DraftKings’ comments and please do not hesitate to contact us if we could be of further assistance as you continue to consider the proposed rules.

Sincerely,

DraftKings Inc.

Harns, Wendy B. (MGCB)

From: Andrew Winchell <andrew.winchell@fanduel.com>
Sent: Thursday, January 6, 2022 4:46 PM
To: MGCB-Rules
Cc: Cory Fox
Subject: FanDuel Comments on Proposed Fantasy Contest Rules
Attachments: FanDuel Comments on Proposed Fantasy Contest Rules 1.6.22.pdf

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Dear Ms. Harns,

Thank you for the opportunity for FanDuel to provide comments on the proposed fantasy contest rules. Attached please find out comments. If you have any questions or need more information about anything we address in our comments, please do not hesitate to contact me.

Sincerely,

Andrew J. Winchell

Director, Government Affairs

Mobile: 845.325.6235

Email: andrew.winchell@fanduel.com

FANDUELGROUP

FANDUEL | betfair | STVG



Cory Fox
cory.fox@fanduel.com

January 6, 2022

Via Email to MGCB-Rules@michigan.gov

Wendy Harns
Michigan Gaming Control Board
P.O. Box 30786
Lansing, MI 48909

Re: FanDuel Comments on “Proposed Changes to the Fantasy Contests rule set”

Dear Ms. Harns:

I write to provide comments on behalf of FanDuel Group, Inc. (“FanDuel”) regarding the Michigan Gaming Control Board’s (“Board”) “Proposed Changes to the Fantasy Contests rule set” (“Proposed Regulations”). Based on our extensive experience as a leading operator in the fantasy sports industry and collaborator with regulators of fantasy contests in many states in the development of their regulations, we offer constructive feedback on ways in which the Proposed Regulations can be improved for effectiveness and consistency with other state regulations.

FanDuel currently operates online fantasy sports contests in forty-three (43) states. We appreciate the opportunity to share our perspective on sports betting regulation with you and have arranged our comments in two parts. Part I is focused on issues of concern in the Proposed Regulations that may significantly impact the ability of fantasy sports operators to successfully operate in Michigan. Part II is focused on requests for clarification.

All changes will be shown as follows: proposed additional text will be bolded and underlined and all text to be deleted will be bolded, bracketed, and struck through.

Part I – Operational Concerns.

- ***Issue 1 – Bank Secrecy Act compliance.***

Rule 534 requires fantasy contest operators and licensed management companies to comply with “all provisions of the bank secrecy act of 1970, 31 USC 5311 to 5332, that are applicable to the fantasy contest operator’s or licensed management company’s fantasy contest operations.” Since, fantasy sports contests are not regulated under the federal Bank Secrecy Act, this rule is unnecessary and should be removed in its entirety. Additionally, it is not industry standard practice in most states to require compliance with the Bank Secrecy Act for fantasy contest operators.

- ***Issue 2 – Requirement to provide information on the order in which funds are used for entry fees.***

Section R432.537(2)(c)(v) requires fantasy contest operators and licensed management companies to provide information on “the order in which funds are used for entry fees” within the terms of all bonus and promotional offers. We do not believe this requirement is necessary for fantasy contests and suggest it be removed. To address this concern, we suggest the following edits:

R432.537(2)(c):

“(c) Bonus and promotional offer terms and the record of all offers must include all of the following, at a minimum:

- (i) The date and time the offer is active and expires.
- (ii) Fantasy contest player eligibility requirements, including any limitations on participation.
- (iii) Any restriction on withdrawals of funds.
- (iv) Entry fee requirements and limitations by fantasy contest type.
- (v) ~~["The order in which funds are used for entry fees.~~
- ~~(vi)]~~ Eligible fantasy contests.
- (vi)~~]~~ Rules regarding cancellation.”

- ***Issue 3 - Notification of changes to terms and conditions.***

Section R432.542(2) of the Proposed Regulations requires fantasy contests operators and licensed management companies to acknowledge, with a date and time stamp, any changes to the player account terms and conditions. We suggest that account terms and conditions should be published and available for customer review and that customers should be notified of any changes, but that requiring time stamped acknowledgement is not necessary. To address this concern, we suggest the following edits:

R432.542(2):

“(2) If the fantasy contest player account terms and conditions are changed, the fantasy contest operator or licensed management company shall **[require]** notify the fantasy contest player **[to acknowledge acceptance]** of the change. ~~["Unless otherwise authorized by the board, the fantasy contest player's acknowledgement must be date and time stamped.]”~~

- ***Issue 4 – Requirements to block and suspend accounts for failed ACH attempts.***

Rule 432.544b requires fantasy contest operators and licensed management companies to temporarily block a fantasy contest player’s account after 5 consecutive failed ACH deposit attempts within a 10-minute period and suspend the account after 5 additional consecutive failed ACH deposit attempts within a 10-minute period. FanDuel takes fraud prevention and anti-money laundering very seriously and works diligently to prevent it. However, the best approach to address

this issue in relation to fantasy contests may change over time and as such, we suggest the following edits to the rule to allow for that flexibility, while still ensuring the Board has the final say in approving our process:

R 432.544b:

“A failed ACH deposit attempt is not considered fraudulent if the fantasy contest player has successfully deposited funds via an ACH transfer on a previous occasion with no outstanding chargebacks. Otherwise, the fantasy contest operator or licensed management company shall **have a process, approved by the board, to address multiple failed ACH deposits** ~~[do all of the following:~~

(a) ~~Temporarily block the fantasy contest player’s fantasy contest player account for investigation of fraud after 5 consecutive failed ACH deposit attempts within a 10-minute period. If there is no evidence of fraud, the block may be vacated.~~

(b) ~~Suspend the fantasy contest player’s fantasy contest player account after 5 additional consecutive failed ACH deposit attempts within a 10-minute period.]”~~

Part II – Requests for clarification.

- *Issue 1 - Request clarification that additional self-limits and notifications are optional.*

Section R432.532d(5) provides a listing of additional self-limits or notifications that “may” be offered by a fantasy contest operator or licensed management company. Can the Board confirm that fantasy contest operators and licensed management companies may offer all, some, or none of the listed additional self-limits and notifications?

- *Issue 2 - Request clarification that self-restriction refund of entry fees only applies to contests that have not yet locked.*

Section R432.532h(2)(b) provides that if an individual who self-restricts has pending entries at the time of self-restriction, those pending entries must be cancelled and the entry fees refunded to the individual. Can the Board confirm that “pending entry” means an entry in a fantasy contest that has not yet locked?

- *Issue 3 - Request clarification on record retention for promotions.*

Rule R432.537 provides for the rules for offering tournaments, bonuses, and promotions. Among the provisions of this rule are record retention requirements for promotions. Can the Board confirm that if a fantasy contest operator or licensed management company has a promotion whereby, they perform intermittent cash drops to customers throughout the year, that this can be treated as a single promotion for purposes of this rule?



We appreciate your time and consideration of our comments and would be happy to discuss at your convenience.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Cory Fox', written in a cursive style.

Cory Fox
Government Affairs and Product Counsel Vice President

Harns, Wendy B. (MGCB)

From: MGCB-Rules
Sent: Monday, January 3, 2022 1:38 PM
To: Murley, David (MGCB); Hicks, David (MGCB); Negin, Charles (MGCB)
Cc: Harns, Wendy B. (MGCB)
Subject: FW: FFPC Public Comments for Administrative Rules for Fantasy Contests
Attachments: FFPC Comments for MGCB Proposed Rules.docx

See attached from comments from FFPC.

Charlie Negin, Manager
Indian Gaming Section
Michigan Gaming Control Board
P.O. Box 30786
Lansing, MI 48909
(517) 241-5672
Email: neginc@michigan.gov

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From: mike@myffpc.com <mike@myffpc.com>
Sent: Wednesday, December 29, 2021 12:36 PM
To: MGCB-Rules <MGCB-Rules@michigan.gov>
Subject: FFPC Public Comments for Administrative Rules for Fantasy Contests

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Hello Ms. Wendy Harns and the Michigan Gaming Control Board,

Attached are public comments for Administrative Rules for Fantasy Contests on behalf of small business season-long fantasy football operator, FFPC, LLC.

Please reach out to us with any questions or comments, as we would be happy to assist to the best of our ability.

Thank you,

Michael Petropoulos
FFPC Compliance Officer



December 29, 2021

To Ms. Wendy Harns and the Michigan Gaming Control Board,

I am contacting you on behalf of the Fantasy Football Players Championship (FFPC). The FFPC is a privately owned, small business season-long fantasy football operator that has been in business since 2008. The FFPC is currently licensed and operating in New York, Colorado, Maryland, Arkansas, New Jersey, New Hampshire, Pennsylvania, Virginia, Missouri, Alabama, Ohio, and Maine. We also have an application under review in Tennessee. We are currently legally operating in Michigan as a season-long fantasy football operator, reporting and paying our monthly taxes.

The FFPC has operated season-long fantasy football leagues legally in the state of Michigan since our inception in 2008, giving fantasy players in the state the chance to play their favorite hobby in competitive formats. We look forward to continuing operating in Michigan for years to come.

After examining the Board's proposed fantasy contest rules, there are several areas of concern in which our company would very much appreciate the Board's clarification or assistance.

Firstly, Rule 522 states –

Rule 522. (1) The following licenses may be issued under the act and these rules: (a) Fantasy contest operator license. (b) Management company license. (2) Except as otherwise provided in sections 3(2) to 3(4) of the act, MCL 432.503, a person must hold a fantasy contest operator license before offering fantasy contests in this state. (3) A person retained by a fantasy contest operator to manage the day-to-day fantasy contest operations of the fantasy contest operator must hold a management company license. (4) A person must hold a management company license before managing the day-to-day fantasy contest operations of a fantasy contest operator.

The FFPC is very much concerned regarding this specific subsection and would appreciate clarification - *(3) A person retained by a fantasy contest operator to manage the day-to-day fantasy contest operations of the fantasy contest operator must hold a management company license.*

The FFPC is a small business with just a handful of full-time employees, all wearing many hats in the company. We do not have any management companies or any third-party assistance in this regard. We just want to clarify that none of the full-time FFPC workers would need to file a management company license application and that we would not be liable for Management Company licensing fees, since we control and operate the company on our own behalf. This



would most certainly be a unique and fiscally burdensome request if an FFPC employee was expected to file as a Management Company licensee, as the fees associated with the license would double our license fees annually, and the request would not seem to make much logical sense, as the employee is part of the FFPC and not an outside management company.

We kindly ask that the Board clarify this requirement to ensure that small operators without any contracted third-party management companies will not need to apply for a management company license.

Secondly, Rule 531 states –

(3) Unless otherwise approved by the board, a fantasy contest operator or licensed management company may not offer or allow any of the following: (a) Any means of fantasy contest team selection or assembly that does not involve the knowledge and skill of a fantasy contest player, including, but not limited to, all of the following: (i) Auto draft functionality, except in the case of a fantasy contest in which a fantasy contest player is required to exert knowledge and skill to assemble 1 or more fantasy contest teams from his or her pool of drafted athletes.

In the FFPC's communications with gaming commissions of states in which we are licensed, the intent of the term "Auto draft" has always been initially misconstrued and later recognized that it does not apply to season-long fantasy contests. Auto draft functionality in daily fantasy contests can lead to the fantasy contest software randomly selecting a team without any user input at all. However, auto draft functionality in Season-long fantasy contests allow users to set personal player rankings and player queues for the fantasy contest software to select exactly the player the user wants to select when it is their turn in the draft. It is an essential and necessary part of season-long leagues as it is used as an efficiency tool to ensure the best user experience for all users in each draft.

We kindly ask that the Board clarify an exemption of this rule for season-long fantasy football operators.

Thirdly, Rule 532e states -

Rule 532e. (1) A fantasy contest player is prohibited from using any script other than an authorized script to create fantasy contest entries or enter or participate in fantasy contests. (2) A fantasy contest operator or licensed management company must not allow and must use commercially reasonable efforts to monitor for and prevent the use of any scripts other than authorized scripts. (3) An authorized script must be clearly and conspicuously published and made readily available to all fantasy contest players on the fantasy contest operator's or licensed management company's fantasy contest platform. (4) A fantasy contest operator or licensed management company may elect not to provide authorized scripts and may prohibit all scripts.

FFPC: Fantasy Football Players Championship
FFPC, LLC
1133 Broadway New York, NY 10010
(212) 929-3372



The FFPC wants the Board to know that while scripts are of concern in DFS leagues, they hold no concern at all in season-long fantasy leagues, specifically snake drafts, as there is nothing a script can do to help or assist a user. Like I previously mentioned, the FFPC offers snake drafts, no salary cap, only one NFL player can be drafted per league, etc. There is no reason for a user to use a script and there is no advantage in attempting to use a script.

Lastly, Rule 534 states –

(1) A fantasy contest operator or licensed management company must comply with all provisions of the bank secrecy act of 1970, 31 USC 5311 to 5332, that are applicable to the fantasy contest operator's or licensed management company's fantasy contest operations.

The FFPC kindly asks that Bank Secrecy Act language be removed from the rules as it is not in line with the industry standard for fantasy operators.

The FFPC would like to thank you for your time and consideration and we look forward to the next steps in the rulemaking process.

Please reach out to us with any questions or comments, as we would be happy to assist to the best of our ability.

Thank you,

Michael Petropoulos
FFPC Compliance Officer
Mike@myffpc.com
(212) 929-3372

Harns, Wendy B. (MGCB)

From: Murley, David (MGCB)
Sent: Wednesday, December 22, 2021 12:54 PM
To: Harns, Wendy B. (MGCB)
Subject: FW: Michigan Gaming Control Board_ Fantasy Sports Contests
Attachments: 2019 Gaming Legislation Intent Letter.pdf

For our rules

David E. Murley
Deputy Director
Online Gaming & Legal Affairs
Michigan Gaming Control Board
(517) 599-5921
Murleyd1@michigan.gov

From: The Office of Senator Hertel <SenCHertel@senate.michigan.gov>
Sent: Wednesday, December 22, 2021 11:51 AM
To: Murley, David (MGCB) <MurleyD1@michigan.gov>
Subject: Michigan Gaming Control Board_ Fantasy Sports Contests

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Good Morning David,

In reviewing Michigan Gaming Control Board's final language for Fantasy Sports Contests, Senator Hertel noticed that the outlined parameters overreach beyond the intended scope of the 2019 Gaming legislation. Attached you will find a detailed letter from Senator Hertel urging the MGCB to reconsider and modify the language before it is submitted to the review board for publication.

We thank you for your consideration and prompt response.

Warmly,

Julia Walters (*she/her*)

Legislative Assistant
Senator Curtis Hertel, Jr.
Senate District 23
P: (517) 373-1734



CURTIS HERTEL JR.
STATE SENATOR
MICHIGAN SENATE

DISTRICT 23
P.O. BOX 30036
LANSING, MI 48909-7536
PHONE: (517) 373-1734
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COMMITTEES:
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ADVICE AND CONSENT (MVC)
HEALTH POLICY AND
HUMAN SERVICES
APPROPRIATIONS SUBCOMMITTEES:
HEALTH AND HUMAN SERVICES (MVC)
CAPITAL OUTLAY
UNIVERSITIES AND
COMMUNITY COLLEGES

December 16, 2021

SUBMITTED VIA EMAIL

Members of the Michigan Gaming Control Board,

As you know, the Michigan Legislature passed, and Governor Whitmer signed into law, a package of bills in late 2019 formally legalizing both online and casino-based sports betting, online casino gaming, and fantasy sports contests. These bills were the culmination of many months of collaboration and negotiation between stakeholders, the legislature, and the administration. I am proud to have worked to negotiate this package of bills through the Senate and ultimately for the Governor's signature.

After review of the draft rules for fantasy sports contests I firmly believe that the draft rules go beyond the scope of the intent of the legislation as passed back in 2019. In particular, under *Part 3: Conduct of Fantasy Contests, Rule 531, subsection 3(b)* it appears the MGCB has imported language from the rule set in the state of Ohio that was intentionally left out of the legislation we passed here in Michigan. "Proposition selection or fantasy contests that have the effect of mimicking proposition selection" is language that looks to be taken directly from Ohio's rule set seemingly with little regard for the fact that they included such verbiage in their legislation while Michigan did not.

While it is clear that daily fantasy contests should not be permitted to mimic a wager on the outcome of a sporting match or game, daily fantasy sports in its essence are a form of gaming based on individual athletes' statistical output in a given contest.

I respectfully request that you remove this language from the draft rules before sending to the Joint Committee on Administrative Rules for final approval. Thank you for your prompt attention to this matter.

Sincerely,

Curtis Hertel, Jr.
State Senator
District 23

Harns, Wendy B. (MGCB)

From: Rachel Peters <rpeters@ownersbox.com>
Sent: Wednesday, January 5, 2022 1:18 PM
To: MGCB-Rules
Subject: Comments on Proposed Fantasy Contest Rules - OwnersBox 3.0 Corporation

Categories: Red Category

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Good Afternoon Ms. Harns,

My name is Rachel Peters, I am the Compliance Officer at OwnersBox 3.0 Corporation. We are a newer Fantasy Sports Operator incorporated in Delaware but operating out of Ontario, Canada. I appreciate you providing an opportunity to submit comments on the proposed rules by your department for Fantasy Contests.

Please see below three areas of concern by our company. I apologize if the format is not what you are looking for, I based it off of previous public hearings/commentary on this matter in other states.

Rule: R 432.511(w)(i) - "Key Person"

Comment:

-
-
- Start-ups and/or smaller operators who do not have diluted ownership can have many shareholders with 5% or greater ownership interest, making this requirement very burdensome and costly (given the potential of increased investigation fees).
-

Recommendation:

-
-
- Consider having the requirement be ownership of 15% or greater and those with involvement in the day-to-day management of fantasy sports contests and/or operations.
-

Rule: R 432.511(z) - "Management Company License"

Comment/Question:

-
-
- In what circumstance is this required? If there is no affiliate ownership of the fantasy sports company this seems

- like a redundant requirement in addition to the disclosure application that would already be required by the day-to-day manager of fantasy contest operations of a fantasy contest operator
-

Recommendation:

-
-
- Have this be a license required only if there is an affiliate company that runs the operations of a fantasy contest operator.
-

Rule: R 432.523 (2)(a),(2)(b), (5)(a), and (5)(b) - Licensing Fees
Comment/Question:

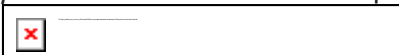
-
-
- For smaller operators this cost can hinder their ability to participate as a fantasy sports operator in the State of Michigan. Limiting competition, potential state revenue, and user experience of Michigan fantasy sports players.
-

Recommendation:

-
-
- A reduced initial fee and renewal fee for one or both applications. Alternatively, a tiered fee schedule, such as one used by Tennessee, with reduced or increased fees more aligned with their size and adjusted revenues.
-

Due to our location, we will be unable to physically attend tomorrow's hearing, but if it is made available virtually I will tune in. Otherwise, thank you for your time and consideration,

Rachel Peters
Compliance Officer
p. 888-912-8780 x. 704 | e. rpeters@ownersbox.com



Harns, Wendy B. (MGCB)

From: Williams, Henry (MGCB)
Sent: Tuesday, May 16, 2023 11:19 AM
To: Griffiths, Tina (MGCB)
Subject: FW: Fantasy Contest Comment Submission
Attachments: PP MGCB comment letter 01.03.2022.pdf

Henry Williams, Executive Director
[Michigan Gaming Control Board](#)
3062 West Grand Boulevard, Suite L-700
Detroit, Michigan 48202
(313) 456-0232 Desk
(313) 456-3193 Fax
Williamsh8@michigan.gov

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From: john@corridordc.com <john@corridordc.com>
Sent: Monday, January 3, 2022 5:18 PM
To: MGCB-Rules <MGCB-Rules@michigan.gov>
Cc: 'Joshua Kirschner' <josh@prizepicks.com>; Williams, Henry (MGCB) <williamsh8@michigan.gov>; Murley, David (MGCB) <MurleyD1@michigan.gov>
Subject: Fantasy Contest Comment Submission

CAUTION: This is an External email. Please send suspicious emails to abuse@michigan.gov

Wendy Harns – On behalf of Joshua Kirschner, VP of Legal and Government Affairs for PrizePicks, I respectfully submit comments on the proposed Fantasy Contest Rules. We appreciate your consideration of these comments and request an opportunity to speak with the Gaming Control Board about the issues raised therein in the near future. Wishing you all a Happy New Year!

Regards,

John A. Pappas
c. 202-870-7777
www.corridordc.com





PRIZEPICKS

SidePrize LLC
3423 Piedmont Rd NE
Suite 321
Atlanta, GA, 30305

January 3, 2022

Via Email Delivery

Michigan Gaming Control Board
P.O. Box 30786
Lansing, MI 48909

Dear Director Williams:

Thank you for the opportunity to share our comments on the Fantasy Contest Rules introduced on November 23, 2021 by the Michigan Gaming Control Board (the "Board"). PrizePicks is a fantasy sports operator that currently offers its games to consumers in 29 states. We are preparing to apply for a Fantasy Operator license in Michigan and are confident that our fantasy contests comport, without exception, with the letter and intent of the Michigan Fantasy Contests Consumer Protections Act of 2019 (the "Act").

While we are pleased that the Rules, in large part, create a reasonable framework to regulate the fantasy sports industry and protect consumers, we have strong concerns with the rules' limitations on "proposition selection," as defined in 432.511(ee) and restricted by 432.531(b). In our view, the rule disallowing a fantasy sports company from offering contests that include an element of "proposition selection" is an unreasonable and unwarranted deviation from the clear definition of "fantasy contests," as provided in statute by the Act. This limitation has no connection to the rules' stated objective of protecting consumers or ensuring the integrity of fantasy contests.

Further, we believe that aforementioned rules banning "prop selection" will disproportionately affect small businesses and stifle innovation within the fantasy sports industry in Michigan. In this regard, Michigan's rules differ substantially from statutes and regulations in the overwhelming majority of states and conflict with the Board's stated objective of promulgating rules that are consistent and work in conjunction with other states.¹ Companies in the fantasy sports industry deserve to have certainty as to the qualifications necessary to do business in Michigan, but unfortunately, because of the arbitrary nature of the "prop selection" rule, many qualified small businesses may be discouraged from seeking licensure, or have their application rejected based upon an unclear standard.

Finally, our company is one of those growing businesses that could potentially be impacted by rules restricting proposition selection fantasy contests, which would jeopardize our ability to do business in Michigan. Our comments provided in this letter will demonstrate how PrizePick's contests meet the Act's definition of fantasy contests and why the proposed proposition selection rule is a violation of the letter and spirit of the Act and should be removed.

Section 1 –PrizePicks contests meet the Michigan statutory definition of "fantasy contest"

In PrizePicks contests, the same as in other forms of fantasy sports, contestants are required to put together a "team" of real-world players and are rewarded for accurate predictions regarding the statistical

¹ See the Gaming Control Board's Regulatory Impact Statement (RIS), response #2

accumulation of a contestant's "team". Our contests are single player, and fantasy contestants are rewarded only when the requisite number of correct predictions is achieved, regardless of the performance of other contestants.

The definition of "fantasy sports" as provided in the Act, 432.502(d), require that fantasy contests meet the following criteria:

(i) No fantasy contest team is composed of the entire roster of a real world sports team.

(ii) No fantasy contest team is composed entirely of individual athletes who are members of the same real world sports team.

(iii) Each prize and award or the value of all prizes and awards offered to winning fantasy contest players is made known to the fantasy contest players in advance of the fantasy contest.

(iv) Each winning outcome reflects the relative knowledge and skill of the fantasy contest players and are determined by the aggregated statistical results of the performance of multiple individual athletes selected by the fantasy contest player to form the fantasy contest team, whose individual performances in the fantasy contest directly correspond with the actual performance of those athletes in the athletic event in which those individual athletes participated.

(v) A winning outcome is not based on randomized or historical events, or on the score, point spread, or performance in an athletic event of a single real-world sports team, a single athlete, or any combination of real-world sports teams.

(vi) The fantasy contest does not constitute or involve and is not based on any of the following:

(A) Racing involving animals.

(B) A game or contest ordinarily offered by a horse track or casino for money, credit, or any representative of value, including any races, games, or contests involving horses or that are played with cards or dice.

(C) A slot machine or other mechanical, electromechanical, or electronic device, equipment, or machine, including computers and other cashless wagering systems.

(D) Poker, blackjack, faro, monte, keno, bingo, fan tan, twenty one, seven and a half, Klondike, craps, chuck a luck, Chinese chuck a luck, Wheel of Fortune, Chemin de Fer, Baccarat, Pai Gow, Beat the Banker, Panguingui, roulette, or other banking or percentage games.

(E) Any other game or device authorized by the board under the Michigan Gaming Control and Revenue Act, 1996 IL 1, MCL 432.201 to 432.226.

(vii) A fantasy contest is not based on a high school or youth sporting event or any event that is not an athletic event.

(viii) A fantasy contest is not conducted in a manner that involves or results in betting on a race, game, contest, or on sports.

PrizePicks contests satisfy the requirements (d)(i) and (d)(ii) by not allowing a contestant to create a team that is composed of an entire roster of a real-world sports team, or create a team that exclusively contains athletes from a single real-world sports team. Rather, contestants must create a team of individual athletes from across multiple real-world teams, and in some cases, multiple sports.

PrizePicks contests satisfy the requirements of (d)(iii) by clearly stating the entry fee and corresponding prize for each contest prior to each customer's entry into the contest. The contestant is made fully aware of the details in advance, and then may choose whether to enter the contest or contests.

PrizePicks contests satisfy the requirements of (d)(iv) because contest entries directly reflect the knowledge and skill of fantasy contestants. PrizePicks contests are games of skill, as evidenced by several years of data that confirms that a small percentage of overall participants are successful. Additionally, fantasy sports players that invest the time and effort to research athletes, sporting events and other pertinent factors perform significantly better than those who rely on random chance, as confirmed by multiple academic studies.² Of the 29 states in which PrizePicks is currently licensed, each state has a substantially similar skill requirement in the definition of fantasy sports, and each state regulatory body has found that our contests meet this criterion.

Finally, the outcomes of these contests are determined entirely by the accumulated statistical results of the performance of athletes in sporting events, based upon a clear scoring system that directly and uniformly corresponds to the statistical performance of the individual athletes.

PrizePicks contests satisfy the requirements of (d)(v) because the contests are based only on real-world sporting events that have not occurred as of the time of the contest entry. The score, point spread, game outcome or performance of the aggregate real-world team or teams is not applicable for purposes of PrizePicks contests. Finally, no fantasy contest outcome is determined by a single athlete – each PrizePicks contest must include multiple athletes, selected from across multiple real-world teams.

PrizePicks contests can satisfy the requirements of (d)(vi), d(vii) and d(viii) because of our ability to restrict the types of contests offered in any given state. Our contests in Michigan will not in any way involve horse racing, casino gaming or any other game authorized by the Michigan Gaming Control and Revenue Act. Further, PrizePicks does not offer contests that are based on high school or youth sporting events. Finally, all PrizePicks fantasy contests are not conducted in a manner that involves or results in betting on a race, game, contest or on sports.

Section 2 - Rules restricting proposition selection contradicts the existing statutory definition of fantasy contests and exceed the scope of the Board's rulemaking authority

We have established that PrizePicks contests comport with the definition of "fantasy contests" without exception. PrizePicks contests also meet the definition of "proposition selection" as provided in 432.511(ee) because they require contestants to select whether two or more accumulated statistical achievements will or will not occur. Proposition selection, as defined in Rule 432.511(ee), is a generally broad definition that shares significant commonalities with the definition of "fantasy sports" as provided in the Act, 432.502(d). Not only is proposition selection a very common style of fantasy contest that is offered by a growing number of fantasy sports companies, proposition selection is also a component of all forms of fantasy sports, which are exclusively based upon accumulated statistical achievements of two or more athletes. Whether the objective of a fantasy contest is to select whether a particular athlete will statistically outperform other athletes, or whether the objective is to select whether such athlete will or will not achieve an identified statistical output, all fantasy sports contests invariably contain an element of "proposition selection" as defined.

This new limitation on proposition selection has the effect of significantly narrowing the statutory definition of fantasy contests, with the end result of restricting many, if not all, fantasy contests that meet

² [Is It Luck or Skill: Establishing Role of Skill in Mutual Fund Management and Fantasy Sports](https://devavrat.mit.edu/wp-content/uploads/2020/08/report_skill.pdf), Massachusetts Institute of Technology (2018): https://devavrat.mit.edu/wp-content/uploads/2020/08/report_skill.pdf

the statutory criteria for such contests. Because the Michigan Legislature has already provided a clear, thoughtful and exhaustive definition of fantasy contests in statute, the Board should not, and cannot, promulgate rules that substantially alter, exceed or contradict the existing statutory framework.

Furthermore, this new restriction on proposition selection is not reasonably tied to any purpose provided for in the Act. 432.503(5) provides: *“The board may promulgate rules related to the conduct of fantasy contests, including rules setting forth penalties for violations of this act or any rules promulgated under this act.”* Additionally, 432.510 provides rulemaking authority that includes the catch-all provision *“Any other rule the board determines is necessary to ensure the integrity of fantasy contests.”* While these grants of rulemaking authority initially appear somewhat broad, they do require the Gaming Control Board to tie their regulations to a purpose related to either the enforcement of licensed operators and applicants, consumer protection, or the integrity of fantasy contests. In this instance, we are not aware of an authorized regulatory purpose behind rules creating an arbitrary distinction as to what constitutes a fantasy sports contest when that definition is already well-covered by statute. Proposition selection contests must be allowed as long as they abide by the Board’s licensing requirements and perform the requisite duties including providing the necessary consumer protections and contest integrity safeguards.

Limiting the fantasy sports marketplace was not the intent of the Act, which was passed by the Michigan Legislature in 2019 to provide fair but minimally intrusive regulations for this growing industry and provide basic consumer protections for the more than one million Michiganders who partake in fantasy sports. The legislation was intended to be friendly to businesses as well as consumers, as evidenced by 432.503(3), which has allowed fantasy operators in Michigan to continue offering their product while the application process has been developed. The Legislature made the policy decision to maintain the status quo in the Michigan fantasy sports landscape, and the Gaming Control Board should not unilaterally depart from this intent by adopting a rule that will greatly limit the existing fantasy sports landscape.

Therefore, we respectfully request that the Gaming Control Board amend Rule 432.531 by removing subsection (3)(b) in its entirety.

Section 3 – Rules restricting proposition selection will harm Michigan fantasy sports businesses and is at odds with federal and other states’ laws

As discussed above, we believe that the proposition selection rule should be removed for purely legal reasons, but additionally there are compelling practical and policy reasons why this rule should not stand as written.

The Gaming Control Board’s Regulatory Impact Statement (RIS) states an intent to work in conjunction with other states’ rules and reflect best practices from those jurisdictions. It is puzzling, then, that they would adopt the proposition selection restriction, which is present in only one other jurisdiction, Ohio. The RIS specifically lists Indiana, Pennsylvania, and Ohio as similarly situated states, but neither Indiana, Pennsylvania, nor any other state in the United States has adopted a rule or statutory definition that would restrict or otherwise distinguish fantasy contests that involve proposition selection. Rather, the overwhelming majority of states, including at a minimum the 29 states in which PrizePicks currently operates, rely on a definition substantially similar to the definition provided by statute in Michigan’s Fantasy Contests Consumer Protection Act. This common definition stems from federal law, the Unlawful Internet Gambling Enforcement Act, 31 U.S. Code § 5361, et seq., which has defined fantasy sports as a product category of its own since 2006. We urge the Board to rely on the statutory definition of fantasy

sports that has been nearly universally adopted, and not create any new and unnecessary rules that will create an unlevel playing field for Michigan.

If this rule remains in place, it will certainly have a chilling effect on fantasy sports companies that are considering operating in Michigan. For one, uncertainty about the rule and its application to certain types of fantasy contests will at least give operators pause, if not dissuade them from entering the state entirely. Additionally, it will have the likely effect of generating excessive administrative hearings and litigation, especially among operators who have been denied a license on the grounds that their games constitute proposition selection. Finally, this rule will dissuade fantasy sports companies from innovating their products. The fantasy sports industry is the result of countless innovations over the years, and must be allowed to grow and continue to enhance the sports fan experience. If this spirit of innovation was stifled by regulations that blanketly exclude a large sector of the industry, Michigan customers and small businesses will suffer for it.

Thank you for your time in addressing these issues, which are of critical importance to PrizePicks and many other similarly situated companies in Michigan. It is our sincere hope that these two minor rules changes will go into effect and allow law-abiding fantasy sports companies to offer their product to the millions of Michigan sports enthusiasts who deserve access to safe, well-regulated and exciting fantasy sports contests.

Sincerely,

Joshua L. Kirschner
Vice President, Legal & Government Affairs
PrizePicks
(404) 543-6115

Harns, Wendy B. (MGCB)

From: Murley, David (MGCB)
Sent: Thursday, January 6, 2022 5:46 AM
To: Harns, Wendy B. (MGCB)
Subject: Fwd: Vivid Seats/Betcha - Comment re MGCB Proposed Administrative Rules for Fantasy Contests
Attachments: Vivid Seats - Betcha - Comment re MGCB Proposed Administrative Rules for Fantasy Contests (1.5.22).pdf

FYI

David E. Murley
Deputy Director
Online Gaming & Legal Affairs
Michigan Gaming Control Board
(517) 599-5921
Murleyd1@michigan.gov

From: Chenault, Delbert J. <dchenault@clarkhill.com>
Sent: Wednesday, January 5, 2022 10:56:27 PM
To: Murley, David (MGCB) <MurleyD1@michigan.gov>
Cc: Hernly, Sara C. <shernly@clarkhill.com>
Subject: Vivid Seats/Betcha - Comment re MGCB Proposed Administrative Rules for Fantasy Contests

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Hi, Dave:

Please find attached comments to MGCB's draft rules for fantasy contests from our client Vivid Seats. We will also be hand delivering a copy of this letter to the MGCB's offices tomorrow. Thank you and let me know if you have any questions regarding the attached.

Del Chenault

Director, Government Affairs

Clark Hill

212 East Cesar E. Chavez Avenue, Lansing, MI 48906

+1 517.318.3036 (office) | +1 517.282.3764 (cell) | +1 517.318.3079 (fax)

dchenault@clarkhill.com | www.clarkhill.com



January 5, 2022

VIA ELECTRONIC MAIL & HAND DELIVERY

Mr. Henry Williams
Executive Director
Michigan Gaming Control Board
P.O. Box 30786
Lansing, MI 48909

**RE: COMMENTS IN RESPONSE TO THE PROPOSED FANTASY CONTESTS
RULE SET**

Dear Executive Director Williams:

I am the Vice President and Deputy General Counsel of Vivid Seats LLC (“Vivid Seats”). On December 13, 2021, we acquired Betcha Sports, Inc. (“Betcha”), a fantasy contest operator. Betcha offers fantasy contests where customers make multiple proposition selections concerning players on different teams. The following comments are submitted in response to the proposed Fantasy Contest Rules (the “Draft Rules”) issued by the Michigan Gaming Control Board (the “Board”).

Executive Summary

In 2019, the Michigan State Legislature passed the Fantasy Contests Consumer Protection Act (“FCCPA”). The FCCPA provides clear guidelines defining the scope of fantasy contests. We believe that sections 432.501(ee) and 432.531(3)(b) of the Draft Rules, which appear to ban fantasy games that rely upon multiple proposition selections, are inconsistent with the language and intent of the FCCPA. We disagree with the Board’s apparent determination that proposition-based fantasy products should not be considered “fantasy contests” under the current FCCPA language. Betcha’s fantasy contests are not based on random chance, like gambling, but rely upon the player’s strategy, relative knowledge and skill. For that reason, Betcha’s product offering meets the definition of “fantasy contests” set forth in the FCCPA and is regulated under the current language of the FCCPA. As such, we urge the Board to strike sections 432.501(ee) and 432.531(3)(b) from the Draft Rules.

The Current Language of the FCCPA Includes Betcha’s Product by Definition and Regulates Its Fantasy Contests

The FCCPA was enacted on December 20, 2019, with an intent “to regulate the conduct of fantasy contests; to protect Michigan participants in fantasy contests; to require licensing of the operators of fantasy contests; to impose fees on the operators of fantasy contests; to provide for the powers

and duties of certain state governmental officers and entities; to create the fantasy contest fund; to prohibit violations of this act; to prescribe civil sanctions; and to prescribe penalties.”

As described below, Betcha’s fantasy contests fall within the definition of “fantasy contest” under the FCCPA,¹ Section 432.502(d) of the FCCPA provides the following definitions for a fantasy contest and fantasy contest operator:

(d) "Fantasy contest" means a simulated game or contest with an entry fee that meets all of the following conditions:

(i) No fantasy contest team is composed of the entire roster of a real-world sports team.

(ii) No fantasy contest team is composed entirely of individual athletes who are members of the same real-world sports team.

(iii) Each prize and award or the value of all prizes and awards offered to winning fantasy contest players is made known to the fantasy contest players in advance of the fantasy contest.

(iv) Each winning outcome reflects the relative knowledge and skill of the fantasy contest players and are determined by the aggregated statistical results of the performance of multiple individual athletes selected by the fantasy contest player to form the fantasy contest team, whose individual performances in the fantasy contest directly correspond with the actual performance of those athletes in the athletic event in which those individual athletes participated.

(v) A winning outcome is not based on randomized or historical events, or on the score, point spread, or performance in an athletic event of a single real-world sports team, a single athlete, or any combination of real-world sports teams.

(vi) The fantasy contest does not constitute or involve and is not based on any of the following:

(A) Racing involving animals.

(B) A game or contest ordinarily offered by a horse track or casino for money, credit, or any representative of value, including any races, games, or contests involving horses or that are played with cards or dice.

¹ Federal law provides similar requirements for fantasy contests and further supports our belief that Betcha’s product falls within the intended definition of “fantasy contests” under the FCCPA. Under federal law, fantasy sports are generally permissible provided that certain key criteria are met. Fantasy sports contests operate in the United States under a carve-out set forth in the Unlawful Internet Gambling Enforcement Act, 31 U.S.C. §5361, et seq. (“UIGEA”). Similar to the FCCPA, at 31 U.S.C. §5362(1)(E)(ix), UIGEA provides that a “bet or wager” does not include participation in any fantasy or simulation sports game or educational game or contest so long as (if the game or contest involves a team or teams) no fantasy or simulation sports team is based on the current membership of an actual team that is a member of an amateur or professional sports organization and the fantasy or simulation sports game or educational game or contest meets the following conditions: (1) all prizes and awards offered to winning participants are established and made known to the participants in advance of the game or contest and their value is not determined by the number of participants or the amount of any fees paid by those participants; (2) all winning outcomes reflect the relative knowledge and skill of the participants and are determined predominantly by accumulated statistical results of the performance of individuals in multiple real-world sporting or other events; and (3) no winning outcome is based on either the score, point-spread of any performance or performances of any single real-world team or any combination of such teams, or solely on any single performance of an individual athlete in any single real-world sporting or other event. 31 U.S.C. §5362(1)(E)(ix). Accordingly, if a fantasy sports offering satisfies these conditions, paying a participation or entry fee is not a bet or wager and, since it is not a bet or wager, it does not constitute unlawful Internet gambling under the UIGEA.

(C) A slot machine or other mechanical, electromechanical, or electronic device, equipment, or machine, including computers and other cashless wagering systems.

(D) Poker, blackjack, faro, monte, keno, bingo, fan tan, twenty-one, seven and a half, Klondike, craps, chuck a luck, Chinese chuck a luck, Wheel of Fortune, Chemin de Fer, Baccarat, Pai Gow, Beat the Banker, Panguingui, roulette, or other banking or percentage games.

(E) Any other game or device authorized by the board under the Michigan Gaming Control and Revenue Act, 1996 IL 1, MCL 432.201 to 432.226.

(vii) A fantasy contest is not based on a high school or youth sporting event or any event that is not an athletic event.

(viii) A fantasy contest is not conducted in a manner that involves or results in betting on a race, game, contest, or on sports.

...

(f) "Fantasy contest operator" means a person that operates, carries on, conducts, maintains, exposes, or offers for play fantasy contests and awards prizes of value and includes a licensed fantasy contest operator[...].

After careful analysis of the statute, it is clear that Betcha's fantasy contests are well-within the scope of the FCCPA's "fantasy contest" definition. One of our recent regulatory filings in another jurisdiction included the following description of Betcha's fantasy contests:

Betcha offers daily fantasy sports contests where users choose individual players and select whether those players will either perform statistically above or below fantasy projections. Betcha's contests are based on the results of real-world sports games conducted in real time. Players would select athletes in fantasy contests, with the player's score based on the selected athletes' results. Scores for each contest are based on a parlay of two or more different athletes' performances. Prizes are fixed and players are made aware of prizes before entering a contest. All winning outcomes reflect the relative knowledge, skill of the Participants, and are determined by the aggregated statistical results of the performance of multiple individual athletes selected by the fantasy contest player to form the fantasy contest team, whose individual performances in the fantasy contest directly correspond with the actual performance of those athletes in the athletic event in which those individual athletes participated.

Information is provided in the form of a list of games available for player-based contests. An example would be Las Vegas vs. Dallas (NHL), Thursday at 8:00pm; Tampa Bay vs. Kansas City (NFL), Thursday at 8:20pm; Cincinnati vs. Chicago Cubs (MLB), Thursday at 8:15pm. Users select a particular game. For this example, we will use the Tampa Bay / Kansas City game.

Information is then provided for athletes participating in that game in the form of fantasy projections. An example would be Tom Brady, 263.5 passing yards; Patrick Mahomes, 307.5 passing yards. Users select players for the contest. There must be a minimum of two players selected, and there must be a minimum of two teams represented among the

selected players. For this example, we will use Tom Brady (TB), Patrick Mahomes (KC), and Travis Kelce (KC). Note that, for Kelce, the fantasy projection is 75.5 receiving yards.

Users must then select whether each of the athletes they chose will either perform statistically above or below the fantasy projection. For this example, we will assume the user entered that Brady will throw more than 263.5 yards, Mahomes will throw fewer than 307.5 yards, and Kelce will have fewer than 75.5 receiving yards. Each correct selection will earn the user a point. The contest specifies how many points are required to win. In this example, three points are required to win the contest. Information is provided letting the user know what the contest reward will be in the form of a payout multiplier. For this example, the payout multiplier is 5.0.

Users then select a contest entry fee. For this example, we will use \$1.00. Information is then provided that informs the user that the contest will award \$5.00, as determined by the displayed multiplier, if the user wins. The user then confirms the contest entry details, and \$1.00 will then be debited from the user account.

If all portions of the user's entry are correct, the user will have earned three points. This is the value required to win the contest, and the user will be credited \$5.00. If the user's entry does not earn three points, the user will not be credited.

Significantly, to win a fantasy contest on Betcha, a participant must know enough about the relevant athletes and teams to understand how their performances may impact one another. For a hockey game, for example, a participant might need to pick above or below a "goals allowed" fantasy projection for a goalie and above or below a "goals made" fantasy projection for an opposing player. To win, the participant would need to understand the goalie's relative skill as opposed to that of the opposing player. The participant uses knowledge and does not rely on random luck.

As described above, Betcha's fantasy contests clearly meet the conditions in Section 432.502(d)(i)-(viii). Betcha's fantasy contests (i) require participants to create a roster of two or more players from at least two teams (satisfying 432.502(d)(i) and (ii)); (ii) clearly list the value of any prize in advance (satisfying 432.502(d)(iii)); and (iii) outcomes reflect the relative knowledge and skill of fantasy contest players and are determined by the combined real-world performances of multiple athletes (satisfying 432.502(d)(iv) and (v)). Our fantasy contests are limited to professional athletic events and do not include any youth events or events involving animals, slot machines, or other games of chance prohibited by Section 432.502(d)(vi)-(vii). Our fantasy contests do not involve betting on the outcome of a race, game or contest as prohibited by 432.502(d)(viii).

As such, when comparing Betcha's fantasy contest description to the FCCPA's definition, our fantasy contests fall squarely within the current language of the FCCPA. Our product's clear adherence to the "fantasy contest" definition also demonstrates that it is not "gambling" as referenced in the Michigan Gambling Outlets Amendment, Proposal 1 of 2004. A successful contest outcome for our product is not a game of chance, it relies upon the knowledge and skill of the player.

Sections 432.501(ee) and 432.531(3)(b) of the Draft Rules Are Inconsistent with the Intended Scope of the FCCPA

Sections 432.501(ee) and 432.531(3)(b) of the Draft Rules state the following:

(ee) “Proposition selection” means a fantasy contest player choosing whether an identified instance or statistical achievement will occur, will be achieved, or will be surpassed.

(3) Unless otherwise approved by the board, a fantasy contest operator or licensed management company may not offer or allow any of the following:

...

(b) Proposition selection or fantasy contests that have the effect of mimicking proposition selection.

We believe that these sections are inconsistent with the scope the FCCPA and should be deleted. The FCCPA does not include a “no propositions” qualifier in the definition of “fantasy contest.” Sections 432.501(ee) and 432.531(3)(b) of the Draft Rules deviate significantly from the definitional language in the FCCPA by introducing a qualifier that is not present in the extensive definition provided by the Legislature. Thus, if approved, sections 432.501(ee) and 432.531(3)(b) would appear to ban fantasy contests that are permissible under the FCCPA.

Therefore, because these sections are inconsistent with the broad scope of permissible fantasy contests outlined in the FCCPA, and the FCCPA already regulates the fantasy contests that sections 432.501(ee) and 432.531(3)(b) of the Draft Rules are trying to capture, we urge sections 432.501(ee) and 432.531(3)(b) be deleted.

Conclusion

For the reasons noted above, we believe that the current FCCPA language is sufficient to regulate proposition-based fantasy contests within the state of Michigan. We urge the Board to delete sections 432.501(ee) and 432.531(3)(b) of the Draft Rules.

Thank you for your time and consideration.

Sincerely,



Ryan J. Fitts
VP, Deputy General Counsel

From: [Meredith Yu](#)
To: [MGCB-Rules](#)
Subject: Yahoo Fantasy Sports Comments on Fantasy Contest Rules
Date: Thursday, January 6, 2022 3:38:57 PM
Attachments: [YFS Comments on Updated MI Rules_MY01042022.pdf](#)

CAUTION: This is an External email. Please send suspicious emails to abuse@michigan.gov

See the attached comments on behalf of Yahoo Fantasy Sports. Please reach out if I can provide any additional information or answer questions you may have. We look forward to working with you.

Best,
Meredith

Meredith C. Yu
Senior Director, Product Compliance
M 3107419578





January 6, 2022

VIA E-MAIL

Michigan Gaming Control Board
Attn: Wendy Harns
3062 West Grand Boulevard, Suite L-700
Detroit, MI 48202-6062
MGCB-Rules@michigan.gov

Subject: Yahoo's Comments on the Gaming Control Board's Draft Rules for Fantasy Contests

Dear Ms. Harns:

On behalf of Yahoo Fantasy Sports LLC, thank you for the opportunity to submit comments on the Michigan Gaming Control Board's Draft Rules for Fantasy Contests ("Proposed Rules"). Yahoo submits the following comments for the Board's consideration regarding the Proposed Rules.

1. Definition of Key Person

Rule Reference: 432.511(w)(v) to (vii)

The Proposed Rules suggest a Key Person includes an affiliate of the applicant, a director of an affiliate of the applicant, and a managerial employee of an affiliate of the applicant. However, the Fantasy Contest Consumer Protection Act only uses the definition of a key employee as "an employee of the fantasy contest operator" and does not include language regarding key persons or employees of affiliate organizations. The Act and the Proposed Rules state an applicant has complied with the requirement if it has identified at least 1 key person who meets the definition of a key employee. While including key persons of affiliate organizations is often a requirement for sports betting operators, no other jurisdiction where we operate fantasy sports requires this level of licensure for fantasy sports contest operators. Given the Act makes no reference to Key Person or individuals from affiliate organizations, we respectfully request the Board reconsider the definition of "key persons" within the Proposed Rules to remove references to individuals from affiliate organizations. Yahoo has operated continuously in Michigan since July of 2015. However, given our complex ownership structure, any personal disclosure requests from individuals from our affiliate organizations who have no involvement in the day-to-day management of fantasy sports would likely impede us from operating in the state and offering contests to Michigan residents.

2. Geolocation

Rule Reference: 432.539(2)



The Board has included requirements with respect to geolocation checks prior to purchase of an entry which are appropriate and consistent with the paid fantasy regulations of other states. However, additional clarification is needed to understand what is meant by “dynamic monitoring” of a player’s location. Other jurisdictions require a geolocation check each time a player makes a deposit and at the time of contest entry. It would be overly burdensome, technologically and financially, to require continual geolocation checks after users have entered, as most users spend significant time with their contest pages open, tracking their players and teams, once contests have started and lineups have locked. No other jurisdiction requires real-time monitoring of a player’s location throughout the fantasy contest player session. In the absence of additional clarification as to what is meant by “dynamic monitoring”, we recommend the Board remove this requirement and mirror the geolocation obligations required by the majority of states that have implemented laws and regulations governing paid fantasy sports and limit geolocation checks at time of deposit and contest entry. We offer paid fantasy sports in 41 states and no other jurisdiction has this requirement.

3. Compliance with Bank Secrecy Act

Rule Reference: 432.534

Yahoo Fantasy Sports has implemented a strong compliance framework which includes internal controls around KYC, fraud detection, and anti-money laundering. However, fantasy sports contests are not regulated under the federal Bank Secrecy Act and as a result, we request any compliance requirements with BSA regulations be removed from the Proposed Rules. No fantasy sports regulation or law in any jurisdiction where Yahoo operates paid fantasy sports has this requirement.

4. Confidentiality

Rule Reference: 432.528(4)

The Proposed Rules require applicants or licensees to accept any risk as a result of the public disclosure of information in conjunction with a license application. We respectfully request all records, internal controls and evidence shared with the Michigan Gaming Control Board in conjunction with a fantasy sports operator application remain confidential which is consistent with regulatory requirements in other jurisdictions. At a minimum, licensing information shared pertaining to indirect affiliate organizations and investors should remain confidential. Further, the Board should establish a process, similar to the SEC rules, that allows for individuals or organizations to submit confidential treatment request applications in cases where there is an objection to the public release of confidential information that is otherwise required to be filed.

5. Self Restriction Conditions



Rule Reference: 432.532d(3)(d)

No other jurisdiction requires players to agree to release authorizations holding harmless the state, the board, or employees of the board. We respectfully request the Board to reconsider this overreaching requirement.

6. Terms and Conditions

Rule Reference: 432.542(1)(c)(iii)

Additional clarification is needed within the Proposed Rules specific to the rules and obligations of fantasy contest players. All Yahoo Fantasy Sports fantasy players agree to our paid fantasy contest terms of service which are governed by New York law as they incorporate by reference the Yahoo Inc. Terms of Service. Our preference would be to not break out for Michigan residents only a different forum or choice of law given our terms are governed by New York law for all other states where we are licensed and operate paid fantasy sports. However, at a minimum, we suggest that the Board clarify with more specificity what it means by "jurisdiction" in this section of the Proposed Rules. As currently drafted, it is unclear if the Board's intention is to mean forum, choice of law, or both.

Thank you for your consideration of our comments regarding the Proposed Rules.

Sincerely,

A handwritten signature in black ink that reads "Meredith C. Yu". The signature is written in a cursive, flowing style.

Meredith C. Yu
Head of Compliance, Yahoo Fantasy Sports
(310) 741-9578
mcheek@yahoosports.com

Harns, Wendy B. (MGCB)

From: Aaron Merrill <aaron.merrill@icloud.com>
Sent: Wednesday, January 5, 2022 11:32 AM
To: MGCB-Rules
Subject: Michigan Resident Against the Proposition Selection Ban

CAUTION: This is an External email. Please send suspicious emails to abuse@michigan.gov

My name is {Aaron Merrill} and I am a Michigan resident. I am opposed to MGCB's proposed fantasy contest rule banning proposition selection fantasy games. Proposition selection is my preferred fantasy game and PrizePicks is my preferred provider for daily fantasy. I expect Michigan will protect my right to play daily fantasy on PrizePicks. Please remove the proposition selection ban from the proposed Michigan Fantasy Games Rules.

Sent from my iPhone

Harns, Wendy B. (MGCB)

From: Aarone Ramsey <awall9256@gmail.com>
Sent: Wednesday, January 5, 2022 2:31 PM
To: MGCB-Rules
Subject: Michigan Resident Against the Proposition Selection Ban

CAUTION: This is an External email. Please send suspicious emails to abuse@michigan.gov

My name is Aarone and I am a Michigan resident. I am opposed to MGCB's proposed fantasy contest rule banning proposition selection fantasy games. Proposition selection is my preferred fantasy game and PrizePicks is my preferred provider for daily fantasy. I expect Michigan will protect my right to play daily fantasy on PrizePicks. Please remove the proposition selection ban from the proposed Michigan Fantasy Games Rules.

Harns, Wendy B. (MGCB)

From: Alex Quail <alexquail15@gmail.com>
Sent: Wednesday, January 5, 2022 12:25 PM
To: MGCB-Rules
Subject: Michigan Resident Against the Proposition Selection Ban

CAUTION: This is an External email. Please send suspicious emails to abuse@michigan.gov

My name is Alex and I am a Michigan resident. I am opposed to MGCB's proposed fantasy contest rule banning proposition selection fantasy games. Proposition selection is my preferred fantasy game and PrizePicks is my preferred provider for daily fantasy. I expect Michigan will protect my right to play daily fantasy on PrizePicks. Please remove the proposition selection ban from the proposed Michigan Fantasy Games Rules.

Harns, Wendy B. (MGCB)

From: Alex Shinada <shinada.alex@gmail.com>
Sent: Wednesday, January 5, 2022 3:48 PM
To: MGCB-Rules
Subject: Michigan Resident Against the Proposition Selection Ban

CAUTION: This is an External email. Please send suspicious emails to abuse@michigan.gov

My name is Alexander Shinada and I am a Michigan resident. I am opposed to MGCB's proposed fantasy contest rule banning proposition selection fantasy games. Proposition selection is my preferred fantasy game and PrizePicks is my preferred provider for daily fantasy. I expect Michigan will protect my right to play daily fantasy on PrizePicks. Please remove the proposition selection ban from the proposed Michigan Fantasy Games Rules.

Sent from my iPhone

Harns, Wendy B. (MGCB)

From: Andrew Dunham <dunham.andrew@yahoo.com>
Sent: Wednesday, January 5, 2022 12:58 PM
To: MGCB-Rules
Subject: Michigan Resident Against the Proposition Selection Ban

CAUTION: This is an External email. Please send suspicious emails to abuse@michigan.gov

My name is Andrew Dunham and I am a Michigan resident. I am opposed to MGCB's proposed fantasy contest rule banning proposition selection fantasy games. Proposition selection is my preferred fantasy game and PrizePicks is my preferred provider for daily fantasy. I expect Michigan will protect my right to play daily fantasy on PrizePicks. Please remove the proposition selection ban from the proposed Michigan Fantasy Games Rules.

Harns, Wendy B. (MGCB)

From: brandonbodnar <brandonbodnar@aol.com>
Sent: Wednesday, January 5, 2022 11:53 AM
To: MGCB-Rules
Subject: Michigan Resident Against the Proposition Selection Ban

CAUTION: This is an External email. Please send suspicious emails to abuse@michigan.gov

My name is Brandon Bodnar and I am a Michigan resident. I am opposed to MGCB's proposed fantasy contest rule banning proposition selection fantasy games. Proposition selection is my preferred fantasy game and PrizePicks is my preferred provider for daily fantasy. I expect Michigan will protect my right to play daily fantasy on PrizePicks. Please remove the proposition selection ban from the proposed Michigan Fantasy Games Rules.

Sent from my Verizon, Samsung Galaxy smartphone

Harns, Wendy B. (MGCB)

From: Brandon B <cday820@hotmail.com>
Sent: Wednesday, January 5, 2022 5:56 PM
To: MGCB-Rules
Subject: Michigan Resident Against the Proposition Selection Ban

CAUTION: This is an External email. Please send suspicious emails to abuse@michigan.gov

My name is Brandon Butler and I am a Michigan resident. I am opposed to MGCB's proposed fantasy contest rule banning proposition selection fantasy games. Proposition selection is my preferred fantasy game and PrizePicks is my preferred provider for daily fantasy. I expect Michigan will protect my right to play daily fantasy on PrizePicks. Please remove the proposition selection ban from the proposed Michigan Fantasy Games Rules.

Sent from my iPhone

Harns, Wendy B. (MGCB)

From: bran cawthon <brancawthon@yahoo.com>
Sent: Monday, January 3, 2022 3:30 PM
To: MGCB-Rules
Subject: Michigan Resident Against the Proposition Selection Ban

CAUTION: This is an External email. Please send suspicious emails to abuse@michigan.gov

My name is {Brandon C} and I am a Michigan resident. I am opposed to MGCB's proposed fantasy contest rule banning proposition selection fantasy games. Proposition selection is my preferred fantasy game and PrizePicks is my preferred provider for daily fantasy. I expect Michigan will protect my right to play daily fantasy on PrizePicks. Please remove the proposition selection ban from the proposed Michigan Fantasy Games Rules.

Sent from my iPhone

Harns, Wendy B. (MGCB)

From: Brandon McLane <brandon.mclane.msu00@gmail.com>
Sent: Wednesday, January 5, 2022 12:33 PM
To: MGCB-Rules
Subject: Michigan Resident Against the Proposition Selection Ban

CAUTION: This is an External email. Please send suspicious emails to abuse@michigan.gov

My name is Brandon McLane and I am a Michigan resident. I am opposed to MGCB's proposed fantasy contest rule banning proposition selection fantasy games. Proposition selection is my preferred fantasy game and PrizePicks is my preferred provider for daily fantasy. I expect Michigan will protect my right to play daily fantasy on PrizePicks. Please remove the proposition selection ban from the proposed Michigan Fantasy Games Rules.

Harns, Wendy B. (MGCB)

From: brent gromaski <brent20_07@yahoo.com>
Sent: Wednesday, January 5, 2022 10:26 PM
To: MGCB-Rules
Subject: Michigan Resident Against the Proposition Selection Ban

CAUTION: This is an External email. Please send suspicious emails to abuse@michigan.gov

My name is Brent Gromaski and I am a Michigan resident. I am opposed to MGCB's proposed fantasy contest rule banning proposition selection fantasy games. Proposition selection is my preferred fantasy game and PrizePicks is my preferred provider for daily fantasy. I expect Michigan will protect my right to play daily fantasy on PrizePicks. Please remove the proposition selection ban from the proposed Michigan Fantasy Games Rules.

Harns, Wendy B. (MGCB)

From: Brent Taylor <jayizaaknikotavijax@yahoo.com>
Sent: Tuesday, January 4, 2022 11:56 AM
To: MGCB-Rules
Subject: Michigan Resident Against the Proposition Selection Ban

CAUTION: This is an External email. Please send suspicious emails to abuse@michigan.gov

My name is {Brent Taylor} and I am a Michigan resident. I am opposed to MGCB's proposed fantasy contest rule banning proposition selection fantasy games. Proposition selection is my preferred fantasy game and PrizePicks is my preferred provider for daily fantasy. I expect Michigan will protect my right to play daily fantasy on PrizePicks. Please remove the proposition selection ban from the proposed Michigan Fantasy Games Rules.

Harns, Wendy B. (MGCB)

From: Brian Babcock <brian.babcock82@gmail.com>
Sent: Wednesday, January 5, 2022 12:02 PM
To: MGCB-Rules
Subject: Michigan Resident Against the Proposition Selection Ban

CAUTION: This is an External email. Please send suspicious emails to abuse@michigan.gov

My name is Brian Babcock and I am a Michigan resident. I am opposed to MGCB's proposed fantasy contest rule banning proposition selection fantasy games. Proposition selection is my preferred fantasy game and PrizePicks is my preferred provider for daily fantasy. I expect Michigan will protect my right to play daily fantasy on PrizePicks. Please remove the proposition selection ban from the proposed Michigan Fantasy Games Rules.

Respectfully,

Brian Babcock

Harns, Wendy B. (MGCB)

From: Bryan and Sarina Kilburn <bryankilburn@hotmail.com>
Sent: Tuesday, January 4, 2022 5:24 AM
To: MGCB-Rules
Subject: Michigan Resident Against the Proposition Selection Ban

CAUTION: This is an External email. Please send suspicious emails to abuse@michigan.gov

My name is Bryan Kilburn and I am a Michigan resident. I am opposed to MGCB's proposed fantasy contest rule banning proposition selection fantasy games. Proposition selection is my preferred fantasy game and PrizePicks is my preferred provider for daily fantasy. I expect Michigan will protect my right to play daily fantasy on PrizePicks. Please remove the proposition selection ban from the proposed Michigan Fantasy Games Rules.

Thank you for considering my input as a Michigan Resident and long time fantasy game participant.

Get [Outlook for Android](#)

Harns, Wendy B. (MGCB)

From: Brian Walden <bwalden1026@gmail.com>
Sent: Wednesday, January 5, 2022 5:42 PM
To: MGCB-Rules
Subject: Michigan Resident Against the Proposition Selection Ban

CAUTION: This is an External email. Please send suspicious emails to abuse@michigan.gov

My name is Brian Walden and I am a Michigan resident. I am opposed to MGCB's proposed fantasy contest rule banning proposition selection fantasy games. Proposition selection is my preferred fantasy game and PrizePicks is my preferred provider for daily fantasy. I expect Michigan will protect my right to play daily fantasy on PrizePicks. Please remove the proposition selection ban from the proposed Michigan Fantasy Games Rules.

Sent from my iPhone

Harns, Wendy B. (MGCB)

From: Brian Zaya <mi04se1@gmail.com>
Sent: Wednesday, January 5, 2022 2:10 PM
To: MGCB-Rules
Subject: Michigan Resident Against the Proposition Selection Ban

CAUTION: This is an External email. Please send suspicious emails to abuse@michigan.gov

My name is Brian Zaya and I am a Michigan resident. I am opposed to MGCB's proposed fantasy contest rule banning proposition selection fantasy games. Proposition selection is my preferred fantasy game and PrizePicks is my preferred provider for daily fantasy. I expect Michigan will protect my right to play daily fantasy on PrizePicks. Please remove the proposition selection ban from the proposed Michigan Fantasy Games Rules.

Harns, Wendy B. (MGCB)

From: Caleb Tanner <ctanner2112@gmail.com>
Sent: Wednesday, January 5, 2022 12:50 PM
To: MGCB-Rules
Subject: Michigan Resident Against the Proposition Selection Ban

CAUTION: This is an External email. Please send suspicious emails to abuse@michigan.gov

My name is {FILL IN NAME} and I am a Michigan resident. I am opposed to MGCB's proposed fantasy contest rule banning proposition selection fantasy games. Proposition selection is my preferred fantasy game and PrizePicks is my preferred provider for daily fantasy. I expect Michigan will protect my right to play daily fantasy on PrizePicks. Please remove the proposition selection ban from the proposed Michigan Fantasy Games Rules.

Sent from my iPhone

Harns, Wendy B. (MGCB)

From: Cameron Lomax <csmooove32@yahoo.com>
Sent: Monday, January 3, 2022 3:36 PM
To: MGCB-Rules
Subject: Michigan Resident Against the Proposition Selection Ban

CAUTION: This is an External email. Please send suspicious emails to abuse@michigan.gov

My name is Cameron Lomax and I am a Michigan resident. I am opposed to MGCB's proposed fantasy contest rule banning proposition selection fantasy games. Proposition selection is my preferred fantasy game and PrizePicks is my preferred provider for daily fantasy. I expect Michigan will protect my right to play daily fantasy on PrizePicks. Please remove the proposition selection ban from the proposed Michigan Fantasy Games Rules.

Harns, Wendy B. (MGCB)

From: C Johnson <thecaslou@gmail.com>
Sent: Wednesday, January 5, 2022 12:04 PM
To: MGCB-Rules
Subject: Michigan Resident Against the Proposition Selection Ban

CAUTION: This is an External email. Please send suspicious emails to abuse@michigan.gov

My name is Casey and I am a Michigan resident. I am opposed to MGCB's proposed fantasy contest rule banning proposition selection fantasy games. Proposition selection is my preferred fantasy game and PrizePicks is my preferred provider for daily fantasy. I expect Michigan will protect my right to play daily fantasy on PrizePicks. Please remove the proposition selection ban from the proposed Michigan Fantasy Games Rules.

Harns, Wendy B. (MGCB)

From: Chris Austin <caustin624@icloud.com>
Sent: Wednesday, January 5, 2022 2:16 PM
To: MGCB-Rules
Subject: Michigan Resident Against the Proposition Selection Ban

CAUTION: This is an External email. Please send suspicious emails to abuse@michigan.gov

My name is Chris Austin and I am a Michigan resident. I am opposed to MGCB's proposed fantasy contest rule banning proposition selection fantasy games. Proposition selection is my preferred fantasy game and PrizePicks is my preferred provider for daily fantasy. I expect Michigan will protect my right to play daily fantasy on PrizePicks. Please remove the proposition selection ban from the proposed Michigan Fantasy Games Rules.

Sent from my iPhone

Harns, Wendy B. (MGCB)

From: Chris Goldie <walker2745@yahoo.com>
Sent: Monday, January 3, 2022 3:35 PM
To: MGCB-Rules
Subject: Michigan Resident Against the Proposition Selection Ban

CAUTION: This is an External email. Please send suspicious emails to abuse@michigan.gov

My name is Chris Goldie and I am a Michigan resident. I am opposed to MGCB's proposed fantasy contest rule banning proposition selection fantasy games. Proposition selection is my preferred fantasy game and I think it would be a big mistake to implement this. I hope Michigan will protect my right to play daily fantasy. Please remove the proposition selection ban from the proposed Michigan Fantasy Games Rules.

-Chris

Harns, Wendy B. (MGCB)

From: Business <chrisjindo@yahoo.com>
Sent: Wednesday, January 5, 2022 12:15 PM
To: MGCB-Rules
Subject: Michigan Resident Against the Proposition Selection Ban

CAUTION: This is an External email. Please send suspicious emails to abuse@michigan.gov

My name is Chris Jindo and I am a Michigan resident. I am opposed to MGCB's proposed fantasy contest rule banning proposition selection fantasy games. Proposition selection is my preferred fantasy game and PrizePicks is my preferred provider for daily fantasy. I expect Michigan will protect my right to play daily fantasy on PrizePicks. Please remove the proposition selection ban from the proposed Michigan Fantasy Games Rules.

Harns, Wendy B. (MGCB)

From: Christopher Kruse <krusechr@umich.edu>
Sent: Thursday, January 6, 2022 1:47 PM
To: MGCB-Rules
Subject: Michigan Resident Against the Proposition Selection Ban

CAUTION: This is an External email. Please send suspicious emails to abuse@michigan.gov

My name is Christopher Kruse and I am a Michigan resident. I am opposed to MGCB's proposed fantasy contest rule banning proposition selection fantasy games. Proposition selection is my preferred fantasy game and PrizePicks is my preferred provider for daily fantasy. I expect Michigan will protect my right to play daily fantasy on PrizePicks. Please remove the proposition selection ban from the proposed Michigan Fantasy Games Rules.

Thank you!

--

Christopher Kruse

Ross MBA 2020

Tel/Direct: +1 810 845 4292

krusechr@umich.edu

Harns, Wendy B. (MGCB)

From: lakin1cm@gmail.com
Sent: Thursday, January 6, 2022 12:42 PM
To: MGCB-Rules
Subject: Michigan Resident Against the Proposition Selection Ban

CAUTION: This is an External email. Please send suspicious emails to abuse@michigan.gov

My name is Corey Lakin and I am a Michigan resident. I am opposed to MGCB's proposed fantasy contest rule banning proposition selection fantasy games. Proposition selection is my preferred fantasy game and PrizePicks is my preferred provider for daily fantasy. I expect Michigan will protect my right to play daily fantasy on PrizePicks. Please remove the proposition selection ban from the proposed Michigan Fantasy Games Rules.

Harns, Wendy B. (MGCB)

From: Dombrowski, Craig J <dombr1cj@cmich.edu>
Sent: Wednesday, January 5, 2022 11:27 AM
To: MGCB-Rules
Subject: Michigan Resident Against the Proposition Selection Ban

CAUTION: This is an External email. Please send suspicious emails to abuse@michigan.gov

My name is Craig Dombrowski and I am a Michigan resident. I am opposed to MGCB's proposed fantasy contest rule banning proposition selection fantasy games. Proposition selection is my preferred fantasy game and PrizePicks is my preferred provider for daily fantasy. I expect Michigan will protect my right to play daily fantasy on PrizePicks. Please remove the proposition selection ban from the proposed Michigan Fantasy Games Rules.

Sent from my iPhone

Harns, Wendy B. (MGCB)

From: David Dennany <dennanydavid@yahoo.com>
Sent: Wednesday, January 5, 2022 2:02 PM
To: MGCB-Rules
Subject: Michigan Resident Against the Proposition Selection Ban

CAUTION: This is an External email. Please send suspicious emails to abuse@michigan.gov

My name is David Dennany and I am a Michigan resident. I am opposed to MGCB's proposed fantasy contest rule banning proposition selection fantasy games. Proposition selection is my preferred fantasy game and PrizePicks is my preferred provider for daily fantasy. I expect Michigan will protect my right to play daily fantasy on PrizePicks. Please remove the proposition selection ban from the proposed Michigan Fantasy Games Rules.

Harns, Wendy B. (MGCB)

From: David Latawiec <davidjr831@yahoo.com>
Sent: Monday, January 3, 2022 3:29 PM
To: MGCB-Rules
Subject: Michigan Resident Against the Proposition Selection Ban

CAUTION: This is an External email. Please send suspicious emails to abuse@michigan.gov

My name is David Latawiec Jr and I am a Michigan resident. I am opposed to MGCB's proposed fantasy contest rule banning proposition selection fantasy games. Proposition selection is my preferred fantasy game and PrizePicks is my preferred provider for daily fantasy. I expect Michigan will protect my right to play daily fantasy on PrizePicks. Please remove the proposition selection ban from the proposed Michigan Fantasy Games Rules.

[Sent from Yahoo Mail on Android](#)

Harns, Wendy B. (MGCB)

From: David Miller <davidmiller24@yahoo.com>
Sent: Wednesday, January 5, 2022 11:33 AM
To: MGCB-Rules
Subject: Michigan Resident Against the Proposition Selection Ban

CAUTION: This is an External email. Please send suspicious emails to abuse@michigan.gov

My name is David Miller and I am a Michigan resident. I am opposed to MGCB's proposed fantasy contest rule banning proposition selection fantasy games. Proposition selection is my preferred fantasy game and PrizePicks is my preferred provider for daily fantasy. I expect Michigan will protect my right to play daily fantasy on PrizePicks. Please remove the proposition selection ban from the proposed Michigan Fantasy Games Rules.

Please stop taking away from people's free will to participate in this activity

[Sent from Yahoo Mail on Android](#)

Harns, Wendy B. (MGCB)

From: DeAndre Sutton <dsutton112@hotmail.com>
Sent: Monday, January 3, 2022 3:37 PM
To: MGCB-Rules
Subject: Michigan Resident Against the Proposition Selection Ban

CAUTION: This is an External email. Please send suspicious emails to abuse@michigan.gov

My name is {Andre } and I am a Michigan resident. I am opposed to MGCB's proposed fantasy contest rule banning proposition selection fantasy games. Proposition selection is my preferred fantasy game and PrizePicks is my preferred provider for daily fantasy. I expect Michigan will protect my right to play daily fantasy on PrizePicks. Please remove the proposition selection ban from the proposed Michigan Fantasy Games Rules.

Get [Outlook for iOS](#)

Harns, Wendy B. (MGCB)

From: Dezmond Truth <dezdatruth@yahoo.com>
Sent: Tuesday, January 4, 2022 7:06 AM
To: MGCB-Rules
Subject: Michigan Resident Against the Proposition Selection Ban

CAUTION: This is an External email. Please send suspicious emails to abuse@michigan.gov

My name is {Denezra McDaniel} and I am a Michigan resident. I am opposed to MGCB's proposed fantasy contest rule banning proposition selection fantasy games. Proposition selection is my preferred fantasy game and PrizePicks is my preferred provider for daily fantasy. I expect Michigan will protect my right to play daily fantasy on PrizePicks. Please remove the proposition selection ban from the proposed Michigan Fantasy Games Rules.

Harns, Wendy B. (MGCB)

From: derekzambon <derekzambon@gmail.com>
Sent: Wednesday, January 5, 2022 12:22 PM
To: MGCB-Rules
Subject: Michigan Resident Against the Proposition Selection Ban

CAUTION: This is an External email. Please send suspicious emails to abuse@michigan.gov

My name is Derek Zambon and I am a Michigan resident. I am opposed to MGCB's proposed fantasy contest rule banning proposition selection fantasy games. Proposition selection is my preferred fantasy game and PrizePicks is my preferred provider for daily fantasy. I expect Michigan will protect my right to play daily fantasy on PrizePicks. Please remove the proposition selection ban from the proposed Michigan Fantasy Games Rules.

Sent via the Samsung Galaxy Note20 5G, an AT&T 5G smartphone

Harns, Wendy B. (MGCB)

From: Devaki Hinton-Sutton <devakie@msn.com>
Sent: Monday, January 3, 2022 3:42 PM
To: MGCB-Rules
Subject: Michigan Resident Against the Proposition Selection Ban

CAUTION: This is an External email. Please send suspicious emails to abuse@michigan.gov

My name is Devaki Hinton Sutton and I am a Michigan resident. I am opposed to MGCB's proposed fantasy contest rule banning proposition selection fantasy games. Proposition selection is my preferred fantasy game and PrizePicks is my preferred provider for daily fantasy. I expect Michigan will protect my right to play daily fantasy on PrizePicks. Please remove the proposition selection ban from the proposed Michigan Fantasy Games Rules.

Get [Outlook for iOS](#)

Harns, Wendy B. (MGCB)

From: Donald Rogan <dcrog79@icloud.com>
Sent: Thursday, January 6, 2022 4:09 AM
To: MGCB-Rules
Subject: Michigan Resident Against the Proposition Selection Ban

CAUTION: This is an External email. Please send suspicious emails to abuse@michigan.gov

My name is Donald Rogan and I am a Michigan resident. I am opposed to MGCB's proposed fantasy contest rule banning proposition selection fantasy games. Proposition selection is my preferred fantasy game and PrizePicks is my preferred provider for daily fantasy. I expect Michigan will protect my right to play daily fantasy on PrizePicks. Please remove the proposition selection ban from the proposed Michigan Fantasy Games Rules.

Sent from my iPhone

Harns, Wendy B. (MGCB)

From: Ethan Kaese <ethan.kaese@gmail.com>
Sent: Monday, January 3, 2022 3:40 PM
To: MGCB-Rules
Subject: Michigan Resident Against the Proposition Selection Ban

CAUTION: This is an External email. Please send suspicious emails to abuse@michigan.gov

My name is Ethan and I am a Michigan resident. I am opposed to MGCB's proposed fantasy contest rule banning proposition selection fantasy games. Proposition selection is my preferred fantasy game and PrizePicks is my preferred provider for daily fantasy. I expect Michigan will protect my right to play daily fantasy on PrizePicks. Please remove the proposition selection ban from the proposed Michigan Fantasy Games Rules.

Sent from my iPhone

Harns, Wendy B. (MGCB)

From: Garrett Matthews <gjmatthews@icloud.com>
Sent: Monday, January 3, 2022 8:58 PM
To: MGCB-Rules
Subject: Michigan Resident Against the Proposition Selection Ban

CAUTION: This is an External email. Please send suspicious emails to abuse@michigan.gov

My name is Garrett Matthews and I am a Michigan resident. I am opposed to MGCB's proposed fantasy contest rule banning proposition selection fantasy games. Proposition selection is my preferred fantasy game and PrizePicks is my preferred provider for daily fantasy. I expect Michigan will protect my right to play daily fantasy on PrizePicks. Please remove the proposition selection ban from the proposed Michigan Fantasy Games Rules.

Sent from my iPhone

Harns, Wendy B. (MGCB)

From: Golden Glass <goldenglass@ymail.com>
Sent: Monday, January 3, 2022 3:30 PM
To: MGCB-Rules
Subject: Michigan Resident Against the Proposition Selection Ban

CAUTION: This is an External email. Please send suspicious emails to abuse@michigan.gov

My name is Golden Glass and I am a Michigan resident. I am opposed to MGCB's proposed fantasy contest rule banning proposition selection fantasy games. Proposition selection is my preferred fantasy game and PrizePicks is my preferred provider for daily fantasy. I expect Michigan will protect my right to play daily fantasy on PrizePicks. Please remove the proposition selection ban from the proposed Michigan Fantasy Games Rules.

Sent from my iPhone

Harns, Wendy B. (MGCB)

From: Gregory Seroka <rolled_up_kings@yahoo.com>
Sent: Wednesday, January 5, 2022 11:42 AM
To: MGCB-Rules
Subject: Michigan Resident Against the Proposition Selection Ban

CAUTION: This is an External email. Please send suspicious emails to abuse@michigan.gov

My name is Gregory Seroka and I am a Michigan resident. I am opposed to MGCB's proposed fantasy contest rule banning proposition selection fantasy games. Proposition selection is my preferred fantasy game and PrizePicks is my preferred provider for daily fantasy. I expect Michigan will protect my right to play daily fantasy on PrizePicks. Please remove the proposition selection ban from the proposed Michigan Fantasy Games Rules.

Harns, Wendy B. (MGCB)

From: jmerritt015@aol.com
Sent: Wednesday, January 5, 2022 5:44 PM
To: MGCB-Rules
Subject: Michigan Resident Against the Proposition Selection Ban

CAUTION: This is an External email. Please send suspicious emails to abuse@michigan.gov

My name is Jacob Merritt and I am a Michigan resident. I am opposed to MGCB's proposed fantasy contest rule banning proposition selection fantasy games. Proposition selection is my preferred fantasy game and PrizePicks is my preferred provider for daily fantasy. I expect Michigan will protect my right to play daily fantasy on PrizePicks. Please remove the proposition selection ban from the proposed Michigan Fantasy Games Rules.

Harns, Wendy B. (MGCB)

From: Jake Kendall <jken708@gmail.com>
Sent: Wednesday, January 5, 2022 12:13 PM
To: MGCB-Rules
Subject: Michigan Resident Against the Proposition Selection Ban

CAUTION: This is an External email. Please send suspicious emails to abuse@michigan.gov

My name is Jake J Kendall and I am a Michigan resident. I am opposed to MGCB's proposed fantasy contest rule banning proposition selection fantasy games. Proposition selection is my preferred fantasy game and PrizePicks is my preferred provider for daily fantasy. I expect Michigan will protect my right to play daily fantasy on PrizePicks. Please remove the proposition selection ban from the proposed Michigan Fantasy Games Rules.

Thank you in advance.

Sent from my iPhone

Harns, Wendy B. (MGCB)

From: Jake Minard <jakeminard33@gmail.com>
Sent: Monday, January 3, 2022 7:14 PM
To: MGCB-Rules
Subject: Michigan Resident Against the Proposition Selection Ban

CAUTION: This is an External email. Please send suspicious emails to abuse@michigan.gov

My name is Jake Minard and I am a Michigan resident. I am opposed to MGCB's proposed fantasy contest rule banning proposition selection fantasy games. Proposition selection is my preferred fantasy game and PrizePicks is my preferred provider for daily fantasy. I expect Michigan will protect my right to play daily fantasy on PrizePicks. Please remove the proposition selection ban from the proposed Michigan Fantasy Games Rules.

Thank you,
Jake

Harns, Wendy B. (MGCB)

From: Jake Moore <jakemoore83@hotmail.com>
Sent: Wednesday, January 5, 2022 12:45 PM
To: MGCB-Rules
Subject: Michigan Resident Against the Proposition Selection Ban

CAUTION: This is an External email. Please send suspicious emails to abuse@michigan.gov

My name is Jake Moore and I am a Michigan resident. I am opposed to MGCB's proposed fantasy contest rule banning proposition selection fantasy games. Proposition selection is my preferred fantasy game and PrizePicks is my preferred provider for daily fantasy. I expect Michigan will protect my right to play daily fantasy on PrizePicks. Please remove the proposition selection ban from the proposed Michigan Fantasy Games Rules.

Harns, Wendy B. (MGCB)

From: Jacob Pilarski <jpilarski5@gmail.com>
Sent: Wednesday, January 5, 2022 6:16 PM
To: MGCB-Rules
Subject: Michigan Resident Against the Proposition Selection Ban

CAUTION: This is an External email. Please send suspicious emails to abuse@michigan.gov

My name is Jake Pilarski and I am a Michigan resident. I am opposed to MGCB's proposed fantasy contest rule banning proposition selection fantasy games. Proposition selection is my preferred fantasy game and PrizePicks is my preferred provider for daily fantasy. I expect Michigan will protect my right to play daily fantasy on PrizePicks. Please remove the proposition selection ban from the proposed Michigan Fantasy Games Rules.

Harns, Wendy B. (MGCB)

From: Jamal Fellah <jamalfellah@gmail.com>
Sent: Wednesday, January 5, 2022 12:29 PM
To: MGCB-Rules
Subject: Michigan Resident Against the Proposition Selection Ban

CAUTION: This is an External email. Please send suspicious emails to abuse@michigan.gov

My name is Jamal and I am a Michigan resident. I am opposed to MGCB's proposed fantasy contest rule banning proposition selection fantasy games. Proposition selection is my preferred fantasy game and PrizePicks is my preferred provider for daily fantasy. I expect Michigan will protect my right to play daily fantasy on PrizePicks. Please remove the proposition selection ban from the proposed Michigan Fantasy Games Rules.

Sent from my iPhone

Harns, Wendy B. (MGCB)

From: jamel waddell <j77mel@yahoo.com>
Sent: Wednesday, January 5, 2022 1:00 PM
To: MGCB-Rules
Subject: Michigan Resident Against the Proposition Selection Ban

CAUTION: This is an External email. Please send suspicious emails to abuse@michigan.gov

My name is Jamel Waddell and I am a Michigan resident. I am opposed to MGCB's proposed fantasy contest rule banning proposition selection fantasy games. Proposition selection is my preferred fantasy game and PrizePicks is my preferred provider for daily fantasy. I expect Michigan will protect my right to play daily fantasy on PrizePicks. Please remove the proposition selection ban from the proposed Michigan Fantasy Games Rules.

[Sent from Yahoo Mail on Android](#)

Harns, Wendy B. (MGCB)

From: james jr dodge <dodgejamesjr@msn.com>
Sent: Monday, January 3, 2022 3:43 PM
To: MGCB-Rules
Subject: Michigan Resident Against the Proposition Selection Ban

CAUTION: This is an External email. Please send suspicious emails to abuse@michigan.gov

My name is Jim Dodge and I am a Michigan resident. I am opposed to MGCB's proposed fantasy contest rule banning proposition selection fantasy games. Proposition selection is my preferred fantasy game and PrizePicks is my preferred provider for daily fantasy. I expect Michigan will protect my right to play daily fantasy on PrizePicks. Please remove the proposition selection ban from the proposed Michigan Fantasy Games Rules.

Harns, Wendy B. (MGCB)

From: Jim Matties <jmatties1029@gmail.com>
Sent: Tuesday, January 4, 2022 5:03 PM
To: MGCB-Rules
Subject: Michigan Resident Against the Proposition Selection Ban

CAUTION: This is an External email. Please send suspicious emails to abuse@michigan.gov

My name is James Matties and I am a Michigan resident. I am opposed to MGCB's proposed fantasy contest rule banning proposition selection fantasy games. Proposition selection is my preferred fantasy game and PrizePicks is my preferred provider for daily fantasy. I expect Michigan will protect my right to play daily fantasy on PrizePicks. Please remove the proposition selection ban from the proposed Michigan Fantasy Games Rules.

Harns, Wendy B. (MGCB)

From: James Meador <jmeador206@yahoo.com>
Sent: Monday, January 3, 2022 8:19 PM
To: MGCB-Rules
Subject: Michigan Resident Against the Proposition Selection Ban

CAUTION: This is an External email. Please send suspicious emails to abuse@michigan.gov

My name is {James Meador} and I am a Michigan resident. I am opposed to MGCB's proposed fantasy contest rule banning proposition selection fantasy games. Proposition selection is my preferred fantasy game and PrizePicks is my preferred provider for daily fantasy. I expect Michigan will protect my right to play daily fantasy on PrizePicks. Please remove the proposition selection ban from the proposed Michigan Fantasy Games Rules.

[Sent from Yahoo Mail on Android](#)

Harns, Wendy B. (MGCB)

From: Jarred Pretzer <jarredpretzer@gmail.com>
Sent: Monday, January 3, 2022 3:24 PM
To: MGCB-Rules
Subject: Michigan Resident Against the Proposition Selection Ban

CAUTION: This is an External email. Please send suspicious emails to abuse@michigan.gov

My name is Jarred Pretzer and I am a Michigan resident. I am opposed to MGCB's proposed fantasy contest rule banning proposition selection fantasy games. Proposition selection is my preferred fantasy game and PrizePicks is my preferred provider for daily fantasy. I expect Michigan will protect my right to play daily fantasy on PrizePicks. Please remove the proposition selection ban from the proposed Michigan Fantasy Games Rules.

Harns, Wendy B. (MGCB)

From: Jason Spiller <jspiller33@hotmail.com>
Sent: Monday, January 3, 2022 3:34 PM
To: MGCB-Rules
Subject: Michigan Resident Against the Proposition Selection Ban

CAUTION: This is an External email. Please send suspicious emails to abuse@michigan.gov

My name is Jason Spiller and I am a Michigan resident. I am opposed to MGCB's proposed fantasy contest rule banning proposition selection fantasy games. Proposition selection is my preferred fantasy game and PrizePicks is my preferred provider for daily fantasy. I expect Michigan will protect my right to play daily fantasy on PrizePicks. Please remove the proposition selection ban from the proposed Michigan Fantasy Games Rules.

Harns, Wendy B. (MGCB)

From: Jeffery Markray <jamarkray@yahoo.com>
Sent: Wednesday, January 5, 2022 11:57 AM
To: MGCB-Rules
Subject: Michigan Resident Against the Proposition Selection Ban

CAUTION: This is an External email. Please send suspicious emails to abuse@michigan.gov

My name is {Jeffery Allan Markray\} and I am a Michigan resident. I am opposed to MGCB's proposed fantasy contest rule banning proposition selection fantasy games. Proposition selection is my preferred fantasy game and PrizePicks is my preferred provider for daily fantasy. I expect Michigan will protect my right to play daily fantasy on PrizePicks. Please remove the proposition selection ban from the proposed Michigan Fantasy Games Rules.

[Sent from Yahoo Mail on Android](#)

Harns, Wendy B. (MGCB)

From: Jeremy Battaglia <battaglijer@dewittschools.net>
Sent: Wednesday, January 5, 2022 12:20 PM
To: MGCB-Rules
Subject: Michigan Resident Against the Proposition Selection Ban

CAUTION: This is an External email. Please send suspicious emails to abuse@michigan.gov

To whom it may concern:

My name is Jeremy Battaglia, and I am a Michigan resident. I am OPPOSED to MGCB's proposed fantasy contest rule banning proposition selection fantasy games. Proposition selection is my preferred fantasy game and PrizePicks is a fantastic company. I play a great deal of fantasy sports and online sports gambling. I get a real pleasure from it, especially during football season. It is a great way to unwind. As a MI high school teacher, life has been stressful and hectic the last few years. Please do not take away one of my favorite leisure activities. It helps me unwind and enjoy the games more. I expect Michigan will protect my right to play daily fantasy on PrizePicks and other gaming and gambling sites. Please remove the proposition selection ban from the proposed Michigan Fantasy Games Rules.

Thank you.

Sincerely,

Jeremy Battaglia

Harns, Wendy B. (MGCB)

From: Jimmy Collins <notrejimmy7@icloud.com>
Sent: Monday, January 3, 2022 3:37 PM
To: MGCB-Rules
Subject: Michigan Resident Against the Proposition Selection Ban

CAUTION: This is an External email. Please send suspicious emails to abuse@michigan.gov

My name is Jimmy and I am a Michigan resident. I am opposed to MGCB's proposed fantasy contest rule banning proposition selection fantasy games. Proposition selection is my preferred fantasy game and PrizePicks is my preferred provider for daily fantasy. I expect Michigan will protect my right to play daily fantasy on PrizePicks. Please remove the proposition selection ban from the proposed Michigan Fantasy Games Rules.

Sent from my iPhone

Harns, Wendy B. (MGCB)

From: jmhetrick76 <jmhetrick76@comcast.net>
Sent: Monday, January 3, 2022 4:32 PM
To: MGCB-Rules
Subject: Michigan Resident Against the Proposition Selection Ban

CAUTION: This is an External email. Please send suspicious emails to abuse@michigan.gov

My name is {FILL IN NAME} and I am a Michigan resident. I am opposed to MGCB's proposed fantasy contest rule banning proposition selection fantasy games. Proposition selection is my preferred fantasy game and PrizePicks is my preferred provider for daily fantasy. I expect Michigan will protect my right to play daily fantasy on PrizePicks. Please remove the proposition selection ban from the proposed Michigan Fantasy Games Rules.

Sent from my T-Mobile 5G Device

Harns, Wendy B. (MGCB)

From: Joel Gajewski <jrg0917@wowway.com>
Sent: Wednesday, January 5, 2022 12:49 PM
To: MGCB-Rules
Subject: Michigan Resident Against the Proposition Selection Ban

CAUTION: This is an External email. Please send suspicious emails to abuse@michigan.gov

My name is Joel Gajewski and I am a Michigan resident. I am opposed to MGCB's proposed fantasy contest rule banning proposition selection fantasy games. Proposition selection is my preferred fantasy game and PrizePicks is my preferred provider for daily fantasy. I expect Michigan will protect my right to play daily fantasy on PrizePicks. Please remove the proposition selection ban from the proposed Michigan Fantasy Games Rules.

Joel Gajewski

Harns, Wendy B. (MGCB)

From: John Lowery <jlowery73@yahoo.com>
Sent: Wednesday, January 5, 2022 2:42 PM
To: MGCB-Rules
Subject: Michigan Resident Against the Proposition Selection Ban

CAUTION: This is an External email. Please send suspicious emails to abuse@michigan.gov

My name is JohnLowery and I am a Michigan resident. I am opposed to MGCB's proposed fantasy contest rule banning proposition selection fantasy games. Proposition selection is my preferred fantasy game and PrizePicks is my preferred provider for daily fantasy. I expect Michigan will protect my right to play daily fantasy on PrizePicks. Please remove the proposition selection ban from the proposed Michigan Fantasy Games Rules.

Sent from my iPhone

Harns, Wendy B. (MGCB)

From: john lundy <bear2472002@yahoo.com>
Sent: Wednesday, January 5, 2022 1:40 PM
To: MGCB-Rules
Subject: Michigan Resident Against the Proposition Selection Ban

CAUTION: This is an External email. Please send suspicious emails to abuse@michigan.gov

My name is john lundy and I am a Michigan resident. I am opposed to MGCB's proposed fantasy contest rule banning proposition selection fantasy games. Proposition selection is my preferred fantasy game and PrizePicks is my preferred provider for daily fantasy. I expect Michigan will protect my right to play daily fantasy on PrizePicks. Please remove the proposition selection ban from the proposed Michigan Fantasy Games Rules.

Sent from my iPhone

Harns, Wendy B. (MGCB)

From: JOHN PAYNE <headup4thpoint@sbcglobal.net>
Sent: Wednesday, January 5, 2022 8:40 PM
To: MGCB-Rules
Subject: Michigan Resident Against the Proposition Selection Ban

CAUTION: This is an External email. Please send suspicious emails to abuse@michigan.gov

My name is {John scott payne} and I am a Michigan resident. I am opposed to MGCB's proposed fantasy contest rule banning proposition selection fantasy games. Proposition selection is my preferred fantasy game and PrizePicks is my preferred provider for daily fantasy. I expect Michigan will protect my right to play daily fantasy on PrizePicks. Please remove the proposition selection ban from the proposed Michigan Fantasy Games Rules.

Sent from my iPhone

Harns, Wendy B. (MGCB)

From: jmhetrick76 <jmhetrick76@comcast.net>
Sent: Wednesday, January 5, 2022 1:57 PM
To: MGCB-Rules
Subject: Michigan Resident Against the Proposition Selection Ban

CAUTION: This is an External email. Please send suspicious emails to abuse@michigan.gov

My name is Jon Hetrick and I am a Michigan resident. I am opposed to MGCB's proposed fantasy contest rule banning proposition selection fantasy games. Proposition selection is my preferred fantasy game and PrizePicks is my preferred provider for daily fantasy. I expect Michigan will protect my right to play daily fantasy on PrizePicks. Please remove the proposition selection ban from the proposed Michigan Fantasy Games Rules.

Sent from my T-Mobile 5G Device

Harns, Wendy B. (MGCB)

From: j2cain@gmail.com
Sent: Wednesday, January 5, 2022 2:12 PM
To: MGCB-Rules
Subject: Michigan Resident Against the Proposition Selection Ban

CAUTION: This is an External email. Please send suspicious emails to abuse@michigan.gov

My name is Jordan and I am a Michigan resident. I am opposed to MGCB's proposed fantasy contest rule banning proposition selection fantasy games. Proposition selection is my preferred fantasy game and PrizePicks is my preferred provider for daily fantasy. I expect Michigan will protect my right to play daily fantasy on PrizePicks. Please remove the proposition selection ban from the proposed Michigan Fantasy Games Rules.

Sent from my iPhone

Harns, Wendy B. (MGCB)

From: Jordan Evans <jlevans2325@gmail.com>
Sent: Monday, January 3, 2022 8:59 PM
To: MGCB-Rules
Subject: Michigan Resident Against the Proposition Selection Ban

CAUTION: This is an External email. Please send suspicious emails to abuse@michigan.gov

My name is Jordan and I am a Michigan resident. I am opposed to MGCB's proposed fantasy contest rule banning proposition selection fantasy games. Proposition selection is my preferred fantasy game and PrizePicks is my preferred provider for daily fantasy. I expect Michigan will protect my right to play daily fantasy on PrizePicks. Please remove the proposition selection ban from the proposed Michigan Fantasy Games Rules.

Sent from my iPhone

Harns, Wendy B. (MGCB)

From: Jordan Lamberger <MasterReaperz@live.com>
Sent: Wednesday, January 5, 2022 2:42 PM
To: MGCB-Rules
Subject: Michigan Resident Against the Proposition Selection Ban

CAUTION: This is an External email. Please send suspicious emails to abuse@michigan.gov

My name is Jordan Lamberger and I am a Michigan resident. I am opposed to MGCB's proposed fantasy contest rule banning proposition selection fantasy games. Proposition selection is my preferred fantasy game and PrizePicks is my preferred provider for daily fantasy. I expect Michigan will protect my right to play daily fantasy on PrizePicks. Please remove the proposition selection ban from the proposed Michigan Fantasy Games Rules.

Harns, Wendy B. (MGCB)

From: JOSEPH BARANOWSKI <tbaran007@comcast.net>
Sent: Monday, January 3, 2022 5:50 PM
To: MGCB-Rules
Subject: Michigan Resident Against the Proposition Selection Ban

CAUTION: This is an External email. Please send suspicious emails to abuse@michigan.gov

My name is Joe Baranowski and I am a Michigan resident. I am opposed to MGCB's proposed fantasy contest rule banning proposition selection fantasy games. Proposition selection is my preferred fantasy game and PrizePicks is my preferred provider for daily fantasy. I expect Michigan will protect my right to play daily fantasy on PrizePicks. Please remove the proposition selection ban from the proposed Michigan Fantasy Games Rules.

Harns, Wendy B. (MGCB)

From: Joseph Mansour <joseph67589@aol.com>
Sent: Tuesday, January 4, 2022 5:18 PM
To: MGCB-Rules
Subject: Michigan Resident Against the Proposition Selection Ban

CAUTION: This is an External email. Please send suspicious emails to abuse@michigan.gov

My name is Joseph and I am a Michigan resident. I am opposed to MGCB's proposed fantasy contest rule banning proposition selection fantasy games. Proposition selection is my preferred fantasy game and PrizePicks is my preferred provider for daily fantasy. I expect Michigan will protect my right to play daily fantasy on PrizePicks. Please remove the proposition selection ban from the proposed Michigan Fantasy Games Rules.

Sent from my iPhone

Harns, Wendy B. (MGCB)

From: Kelly Milliken <kmilliken95@gmail.com>
Sent: Monday, January 3, 2022 3:50 PM
To: MGCB-Rules
Subject: Michigan Resident Against the Proposition Selection Ban

CAUTION: This is an External email. Please send suspicious emails to abuse@michigan.gov

My name is Kelly Milliken and I am a Michigan resident. I am opposed to MGCB's proposed fantasy contest rule banning proposition selection fantasy games. Proposition selection is my preferred fantasy game and PrizePicks is my preferred provider for daily fantasy. I expect Michigan will protect my right to play daily fantasy on PrizePicks. Please remove the proposition selection ban from the proposed Michigan Fantasy Games Rules.

Best,
Kelly

Sent from my iPhone

Harns, Wendy B. (MGCB)

From: Kenny Singletary <singletarykenny@yahoo.com>
Sent: Monday, January 3, 2022 4:12 PM
To: MGCB-Rules
Subject: Michigan Resident Against the Proposition Selection Ban

CAUTION: This is an External email. Please send suspicious emails to abuse@michigan.gov

My name is Kenneth Singletary and I am a Michigan resident. I am opposed to MGCB's proposed fantasy contest rule banning proposition selection fantasy games. Proposition selection is my preferred fantasy game and PrizePicks is my preferred provider for daily fantasy. I expect Michigan will protect my right to play daily fantasy on PrizePicks. Please remove the proposition selection ban from the proposed Michigan Fantasy Games Rules.

[Sent from Yahoo Mail on Android](#)

Harns, Wendy B. (MGCB)

From: Kent Fiott <kfiott13@gmail.com>
Sent: Wednesday, January 5, 2022 12:39 PM
To: MGCB-Rules
Subject: Michigan Resident Against the Proposition Selection Ban

CAUTION: This is an External email. Please send suspicious emails to abuse@michigan.gov

My name is Kent and I am a Michigan resident. I am opposed to MGCB's proposed fantasy contest rule banning proposition selection fantasy games. Proposition selection is my preferred fantasy game and PrizePicks is my preferred provider for daily fantasy. I expect Michigan will protect my right to play daily fantasy on PrizePicks. Please remove the proposition selection ban from the proposed Michigan Fantasy Games Rules.

Sent from my iPhone

Harns, Wendy B. (MGCB)

From: kevin/jen bainbridge <jenkevsgoghouse@yahoo.com>
Sent: Tuesday, January 4, 2022 9:17 AM
To: MGCB-Rules
Subject: Michigan Resident Against the Proposition Selection Ban

CAUTION: This is an External email. Please send suspicious emails to abuse@michigan.gov

My name is {Kevin Bainbridge } and I am a Michigan resident. I am opposed to MGCB's proposed fantasy contest rule banning proposition selection fantasy games. Proposition selection is my preferred fantasy game and PrizePicks is my preferred provider for daily fantasy. I expect Michigan will protect my right to play daily fantasy on PrizePicks. Please remove the proposition selection ban from the proposed Michigan Fantasy Games Rules.

[Sent from Yahoo Mail on Android](#)

Harns, Wendy B. (MGCB)

From: Kevin McVay <kevin@tri-covery.com>
Sent: Monday, January 3, 2022 6:36 PM
To: MGCB-Rules
Subject: Michigan Resident Against the Proposition Selection Ban

CAUTION: This is an External email. Please send suspicious emails to abuse@michigan.gov

My name is {Kevin McVay} and I am a Michigan resident. I am opposed to MGCB's proposed fantasy contest rule banning proposition selection fantasy games. Proposition selection is my preferred fantasy game and PrizePicks is my preferred provider for daily fantasy. I expect Michigan will protect my right to play daily fantasy on PrizePicks. Please remove the proposition selection ban from the proposed Michigan Fantasy Games Rules.

--

Kevin McVay, CFSTL3, CMT, CPT, CTPI
General Manager Tri-Covery
248.224.4130

Harns, Wendy B. (MGCB)

From: Kirk Schlappi <kschlappi@comcast.net>
Sent: Wednesday, January 5, 2022 12:58 PM
To: MGCB-Rules
Subject: Michigan Resident Against the Proposition Selection Ban

CAUTION: This is an External email. Please send suspicious emails to abuse@michigan.gov

My name is Kirk Schlappi and I am a Michigan resident. I am opposed to MGCB's proposed fantasy contest rule banning proposition selection fantasy games. Proposition selection is my preferred fantasy game and PrizePicks is my preferred provider for daily fantasy. I expect Michigan will protect my right to play daily fantasy on PrizePicks. Please remove the proposition selection ban from the proposed Michigan Fantasy Games Rules.

Regards,

Kirk

Harns, Wendy B. (MGCB)

From: Kurt Kampf <kkampf72@gmail.com>
Sent: Monday, January 3, 2022 7:09 PM
To: MGCB-Rules
Subject: Michigan Resident Against the Proposition Selection Ban

CAUTION: This is an External email. Please send suspicious emails to abuse@michigan.gov

My name is Kurt Kampf and I am a Michigan resident. I am opposed to MGCB's proposed fantasy contest rule banning proposition selection fantasy games. Proposition selection is my preferred fantasy game and PrizePicks is my preferred provider for daily fantasy. I expect Michigan will protect my right to play daily fantasy on PrizePicks. Please remove the proposition selection ban from the proposed Michigan Fantasy Games Rules.

Thanks,

Kurt

Harns, Wendy B. (MGCB)

From: Kyle Essenberg <kyleessenberg22@gmail.com>
Sent: Wednesday, January 5, 2022 11:27 AM
To: MGCB-Rules
Subject: Michigan Resident Against the Proposition Selection Ban

CAUTION: This is an External email. Please send suspicious emails to abuse@michigan.gov

My name is Kyle Essenberg and I am a Michigan resident. I am opposed to MGCB's proposed fantasy contest rule banning proposition selection fantasy games. Proposition selection is my preferred fantasy game and PrizePicks is my preferred provider for daily fantasy. I expect Michigan will protect my right to play daily fantasy on PrizePicks. Please remove the proposition selection ban from the proposed Michigan Fantasy Games Rules.

Harns, Wendy B. (MGCB)

From: Kyle Murray <kylemurray03@gmail.com>
Sent: Wednesday, January 5, 2022 1:43 PM
To: MGCB-Rules
Subject: Michigan Resident Against the Proposition Selection Ban

CAUTION: This is an External email. Please send suspicious emails to abuse@michigan.gov

My name is Kyle Murray and I am a Michigan resident. I am opposed to MGCB's proposed fantasy contest rule banning proposition selection fantasy games. Proposition selection is my preferred fantasy game and PrizePicks is my preferred provider for daily fantasy. I expect Michigan will protect my right to play daily fantasy on PrizePicks. Please remove the proposition selection ban from the proposed Michigan Fantasy Games Rules.

Sent from my iPhone

Harns, Wendy B. (MGCB)

From: Larry Spencer <larryspencer35@yahoo.com>
Sent: Monday, January 3, 2022 3:23 PM
To: MGCB-Rules
Subject: Michigan Resident Against the Proposition Selection Ban

CAUTION: This is an External email. Please send suspicious emails to abuse@michigan.gov

My name is Larry Spencer and I am a Michigan resident. I am opposed to MGCB's proposed fantasy contest rule banning proposition selection fantasy games. Proposition selection is my preferred fantasy game and PrizePicks is my preferred provider for daily fantasy. I expect Michigan will protect my right to play daily fantasy on PrizePicks. Please remove the proposition selection ban from the proposed Michigan Fantasy Games Rules.

[Sent from Yahoo Mail on Android](#)

Harns, Wendy B. (MGCB)

From: Luke Holcomb <luker1683@gmail.com>
Sent: Monday, January 3, 2022 3:23 PM
To: MGCB-Rules
Subject: Michigan Resident Against the Proposition Selection Ban

CAUTION: This is an External email. Please send suspicious emails to abuse@michigan.gov

My name is Luke Holcomb and I am a Michigan resident. I am opposed to MGCB's proposed fantasy contest rule banning proposition selection fantasy games. Proposition selection is my preferred fantasy game and PrizePicks is my preferred provider for daily fantasy. I expect Michigan will protect my right to play daily fantasy on PrizePicks. Please remove the proposition selection ban from the proposed Michigan Fantasy Games Rules.

Luke Holcomb
317-967-1841

Harns, Wendy B. (MGCB)

From: Marco Benitez <marcobenitez0@gmail.com>
Sent: Monday, January 3, 2022 4:12 PM
To: MGCB-Rules
Subject: Michigan Resident Against the Proposition Selection Ban

CAUTION: This is an External email. Please send suspicious emails to abuse@michigan.gov

My name is Marco benitez and I am a Michigan resident. I am opposed to MGCB's proposed fantasy contest rule banning proposition selection fantasy games. Proposition selection is my preferred fantasy game and PrizePicks is my preferred provider for daily fantasy. I expect Michigan will protect my right to play daily fantasy on PrizePicks. Please remove the proposition selection ban from the proposed Michigan Fantasy Games Rules.

Marco Benitez
VP of Operations



P: [248.989.4200](tel:248.989.4200) ext. 263

F: [248.989.4201](tel:248.989.4201)

C: 248.703.7892

Email: mbenitez@advomas.com

www.advomas.com

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Harns, Wendy B. (MGCB)

From: Marcque Neeley <mix20041@live.com>
Sent: Wednesday, January 5, 2022 8:26 PM
To: MGCB-Rules
Subject: Michigan Resident Against the Proposition Selection Ban

CAUTION: This is an External email. Please send suspicious emails to abuse@michigan.gov

My name is {Marcque Neeley} and I am a Michigan resident. I am opposed to MGCB's proposed fantasy contest rule banning proposition selection fantasy games. Proposition selection is my preferred fantasy game and PrizePicks is my preferred provider for daily fantasy. I expect Michigan will protect my right to play daily fantasy on PrizePicks. Please remove the proposition selection ban from the proposed Michigan Fantasy Games Rules.

Sent via the Samsung Galaxy S20+ 5G, an AT&T 5G smartphone
Get [Outlook for Android](#)

Harns, Wendy B. (MGCB)

From: Matthew Tilmann <mtilmann@icloud.com>
Sent: Monday, January 3, 2022 4:12 PM
To: MGCB-Rules
Subject: Michigan Resident Against the Proposition Selection Ban

CAUTION: This is an External email. Please send suspicious emails to abuse@michigan.gov

My name is Matt Tilmann and I am a Michigan resident. I am opposed to MGCB's proposed fantasy contest rule banning proposition selection fantasy games. Proposition selection is my preferred fantasy game and PrizePicks is my preferred provider for daily fantasy. I expect Michigan will protect my right to play daily fantasy on PrizePicks. Please remove the proposition selection ban from the proposed Michigan Fantasy Games Rules. Plus if prop betting is already allowed as part of the sports books that are already legal, not sure what bearing this should have?

Thanks!

Matt Tilmann

Harns, Wendy B. (MGCB)

From: Matthew Harris <matt_hewh@yahoo.com>
Sent: Monday, January 3, 2022 3:38 PM
To: MGCB-Rules
Subject: Michigan Resident Against the Proposition Selection Ban

CAUTION: This is an External email. Please send suspicious emails to abuse@michigan.gov

My name is Matthew Harris and I am a Michigan resident. I am opposed to MGCB's proposed fantasy contest rule banning proposition selection fantasy games. Proposition selection is my preferred fantasy game and PrizePicks is my preferred provider for daily fantasy. I expect Michigan will protect my right to play daily fantasy on PrizePicks. Please remove the proposition selection ban from the proposed Michigan Fantasy Games Rules.

Harns, Wendy B. (MGCB)

From: Michael allen <illa1dee@yahoo.com>
Sent: Monday, January 3, 2022 3:53 PM
To: MGCB-Rules
Subject: Michigan Resident Against the Proposition Selection Ban

CAUTION: This is an External email. Please send suspicious emails to abuse@michigan.gov

My name is Michael and I am a Michigan resident. I am opposed to MGCB's proposed fantasy contest rule banning proposition selection fantasy games. Proposition selection is my preferred fantasy game and PrizePicks is my preferred provider for daily fantasy. I expect Michigan will protect my right to play daily fantasy on PrizePicks. Please remove the proposition selection ban from the proposed Michigan Fantasy Games Rules.

Sent from my iPhone

Harns, Wendy B. (MGCB)

From: Michael McDonald <mimcdonald1980@gmail.com>
Sent: Monday, January 3, 2022 3:23 PM
To: MGCB-Rules
Subject: Michigan Resident Against the Proposition Selection Ban

CAUTION: This is an External email. Please send suspicious emails to abuse@michigan.gov

My name is Michael McDonald and I am a Michigan resident. I am opposed to MGCB's proposed fantasy contest rule banning proposition selection fantasy games. Proposition selection is my preferred fantasy game and PrizePicks is my preferred provider for daily fantasy. I expect Michigan will protect my right to play daily fantasy on PrizePicks. Please remove the proposition selection ban from the proposed Michigan Fantasy Games Rules.

Sent from my iPhone

Harns, Wendy B. (MGCB)

From: Mike Dziergas <masher_98@yahoo.com>
Sent: Wednesday, January 5, 2022 11:27 AM
To: MGCB-Rules
Subject: Michigan Resident Against the Proposition Selection Ban

CAUTION: This is an External email. Please send suspicious emails to abuse@michigan.gov

My name is Mike Dziergas and I am a Michigan resident. I am opposed to MGCB's proposed fantasy contest rule banning proposition selection fantasy games. Proposition selection is my preferred fantasy game and PrizePicks is my preferred provider for daily fantasy. I expect Michigan will protect my right to play daily fantasy on PrizePicks. Please remove the proposition selection ban from the proposed Michigan Fantasy Games Rules.

[Sent from Yahoo Mail on Android](#)

Harns, Wendy B. (MGCB)

From: Mike Perkins <mvperk@comcast.net>
Sent: Monday, January 3, 2022 4:55 PM
To: MGCB-Rules
Subject: Michigan Resident Against the Proposition Selection Ban

CAUTION: This is an External email. Please send suspicious emails to abuse@michigan.gov

My name is Mike Perkins and I am a Michigan resident. I am opposed to MGCB's proposed fantasy contest rule banning proposition selection fantasy games. Proposition selection is my preferred fantasy game and PrizePicks is my preferred provider for daily fantasy. I expect Michigan will protect my right to play daily fantasy on PrizePicks. Please remove the proposition selection ban from the proposed Michigan Fantasy Games Rules.

Mike Perkins
MVPerk@comcast.net

Harns, Wendy B. (MGCB)

From: Nate Hoekstra <natehoekstra@gmail.com>
Sent: Wednesday, January 5, 2022 11:49 AM
To: MGCB-Rules
Subject: Michigan Resident Against the Proposition Selection Ban

CAUTION: This is an External email. Please send suspicious emails to abuse@michigan.gov

My name is Nathan Hoekstra and I am a Michigan resident. I am opposed to MGCB's proposed fantasy contest rule banning proposition selection fantasy games. Proposition selection is my preferred fantasy game and PrizePicks is my preferred provider for daily fantasy. I expect Michigan will protect my right to play daily fantasy on PrizePicks. Please remove the proposition selection ban from the proposed Michigan Fantasy Games Rules.

--

Sent from Gmail Mobile

Harns, Wendy B. (MGCB)

From: Nathan Jones <dnathan2003@gmail.com>
Sent: Wednesday, January 5, 2022 6:38 PM
To: MGCB-Rules
Subject: Michigan Resident Against the Proposition Selection Ban

CAUTION: This is an External email. Please send suspicious emails to abuse@michigan.gov

My name is Nathan Jones and I am a Michigan resident. I am opposed to MGCB's proposed fantasy contest rule banning proposition selection fantasy games. Proposition selection is my preferred fantasy game and PrizePicks is my preferred provider for daily fantasy. I expect Michigan will protect my right to play daily fantasy on PrizePicks. Please remove the proposition selection ban from the proposed Michigan Fantasy Games Rules.

Sent from my iPhone

Harns, Wendy B. (MGCB)

From: neil kim <kimneil412@gmail.com>
Sent: Wednesday, January 5, 2022 4:08 PM
To: MGCB-Rules
Subject: Michigan Resident Against the Proposition Selection Ban

CAUTION: This is an External email. Please send suspicious emails to abuse@michigan.gov

My name is Neil and I am a Michigan resident. I am opposed to MGCB's proposed fantasy contest rule banning proposition selection fantasy games. Proposition selection is my preferred fantasy game and PrizePicks is my preferred provider for daily fantasy. I expect Michigan will protect my right to play daily fantasy on PrizePicks. Please remove the proposition selection ban from the proposed Michigan Fantasy Games Rules.

Thank you!
Neil

Harns, Wendy B. (MGCB)

From: Nick Svay <nsvayy@yahoo.com>
Sent: Thursday, January 6, 2022 11:59 AM
To: MGCB-Rules
Subject: Michigan Resident Against the Proposition Selection Ban

CAUTION: This is an External email. Please send suspicious emails to abuse@michigan.gov

My name is {FILL IN NAME} and I am a Michigan resident. I am opposed to MGCB's proposed fantasy contest rule banning proposition selection fantasy games. Proposition selection is my preferred fantasy game and PrizePicks is my preferred provider for daily fantasy. I expect Michigan will protect my right to play daily fantasy on PrizePicks. Please remove the proposition selection ban from the proposed Michigan Fantasy Games Rules.

Sent from my iPhone

Harns, Wendy B. (MGCB)

From: Nik Horton <nibbles123443@icloud.com>
Sent: Monday, January 3, 2022 3:37 PM
To: MGCB-Rules
Subject: Michigan Resident Against the Proposition Selection Ban

CAUTION: This is an External email. Please send suspicious emails to abuse@michigan.gov

My name is Nikolaus Horton and I am a Michigan resident. I am opposed to MGCB's proposed fantasy contest rule banning proposition selection fantasy games. Proposition selection is my preferred fantasy game and PrizePicks is my preferred provider for daily fantasy. I expect Michigan will protect my right to play daily fantasy on PrizePicks. Please remove the proposition selection ban from the proposed Michigan Fantasy Games Rules.

Sent from my iPhone

Harns, Wendy B. (MGCB)

From: Noah Lopez <Noahlopez16@outlook.com>
Sent: Monday, January 3, 2022 3:32 PM
To: MGCB-Rules
Subject: Michigan Resident Against the Proposition Selection Ban

CAUTION: This is an External email. Please send suspicious emails to abuse@michigan.gov

My name is Noah Lopez and I am a Michigan resident. I am opposed to MGCB's proposed fantasy contest rule banning proposition selection fantasy games. Proposition selection is my preferred fantasy game and PrizePicks is my preferred provider for daily fantasy. I expect Michigan will protect my right to play daily fantasy on PrizePicks. Please remove the proposition selection ban from the proposed Michigan Fantasy Games Rules.

Harns, Wendy B. (MGCB)

From: Owen Kerswell <owenkerswell@gmail.com>
Sent: Wednesday, January 5, 2022 2:12 PM
To: MGCB-Rules
Subject: Michigan Resident Against the Proposition Selection Ban

CAUTION: This is an External email. Please send suspicious emails to abuse@michigan.gov

My name is Owen Kerswell and I am a Michigan resident. I am opposed to MGCB's proposed fantasy contest rule banning proposition selection fantasy games. Proposition selection is my preferred fantasy game and PrizePicks is my preferred provider for daily fantasy. I expect Michigan will protect my right to play daily fantasy on PrizePicks. Please remove the proposition selection ban from the proposed Michigan Fantasy Games Rules.

Sent from my iPhone

Harns, Wendy B. (MGCB)

From: Paul Boggs <paul_boggs@icloud.com>
Sent: Thursday, January 6, 2022 3:54 AM
To: MGCB-Rules
Subject: Michigan Resident Against the Proposition Selection Ban

CAUTION: This is an External email. Please send suspicious emails to abuse@michigan.gov

My name is Paul Boggs and I am a Michigan resident. I am opposed to MGCB's proposed fantasy contest rule banning proposition selection fantasy games. Proposition selection is my preferred fantasy game and PrizePicks is my preferred provider for daily fantasy. I expect Michigan will protect my right to play daily fantasy on PrizePicks. Please remove the proposition selection ban from the proposed Michigan Fantasy Games Rules.

Harns, Wendy B. (MGCB)

From: Pete Frommeyer <petefro@charter.net>
Sent: Monday, January 3, 2022 8:38 PM
To: MGCB-Rules
Subject: Michigan Resident Against the Proposition Selection Ban

CAUTION: This is an External email. Please send suspicious emails to abuse@michigan.gov

My name is Pete Frommeyer and I am a Michigan resident. I am opposed to MGCB's proposed fantasy contest rule banning proposition selection fantasy games. Proposition selection is my preferred fantasy game and PrizePicks is my preferred provider for daily fantasy. I expect Michigan will protect my right to play daily fantasy on PrizePicks. Please remove the proposition selection ban from the proposed Michigan Fantasy Games Rules.

Sent from my iPhone

Harns, Wendy B. (MGCB)

From: Phil Smith <maizeblue1991@hotmail.com>
Sent: Monday, January 3, 2022 4:36 PM
To: MGCB-Rules
Subject: Michigan Resident Against the Proposition Selection Ban

CAUTION: This is an External email. Please send suspicious emails to abuse@michigan.gov

My name is Philip Smith and I am a Michigan resident. I am opposed to MGCB's proposed fantasy contest rule banning proposition selection fantasy games. Proposition selection is my preferred fantasy game and PrizePicks is my preferred provider for daily fantasy. I expect Michigan will protect my right to play daily fantasy on PrizePicks. Please remove the proposition selection ban from the proposed Michigan Fantasy Games Rules.

Sent from my iPhone

Harns, Wendy B. (MGCB)

From: Pierson Kwiatkowski <pkwiatkowski734@comcast.net>
Sent: Wednesday, January 5, 2022 1:47 AM
To: MGCB-Rules
Subject: Michigan Resident Against the Proposition Selection Ban

CAUTION: This is an External email. Please send suspicious emails to abuse@michigan.gov

My name is Pierson Kwiatkowski and I am a Michigan resident. I am opposed to MGCB's proposed fantasy contest rule banning proposition selection fantasy games. Proposition selection is my preferred fantasy game and PrizePicks is my preferred provider for daily fantasy. I expect Michigan will protect my right to play daily fantasy on PrizePicks. Please remove the proposition selection ban from the proposed Michigan Fantasy Games Rules.

Sent from my iPhone

Harns, Wendy B. (MGCB)

From: RICHARD DALE <briananddeb39635@att.net>
Sent: Tuesday, January 4, 2022 1:25 AM
To: MGCB-Rules
Subject: Michigan Resident Against the Proposition Selection Ban

CAUTION: This is an External email. Please send suspicious emails to abuse@michigan.gov

My name is Richard Dale and I am a Michigan resident. I am opposed to MGCB's proposed fantasy contest rule banning proposition selection fantasy games. Proposition selection is my preferred fantasy game and PrizePicks is my preferred provider for daily fantasy. I expect Michigan will protect my right to play daily fantasy on PrizePicks. Please remove the proposition selection ban from the proposed Michigan Fantasy Games Rules.

Harns, Wendy B. (MGCB)

From: Robert Ferenc <rmferenc@gmail.com>
Sent: Monday, January 3, 2022 5:14 PM
To: MGCB-Rules
Subject: Michigan Resident Against the Proposition Selection Ban

CAUTION: This is an External email. Please send suspicious emails to abuse@michigan.gov

My name is Robert Ferenc and I am a Michigan resident. I am opposed to MGCB's proposed fantasy contest rule banning proposition selection fantasy games. Proposition selection is my preferred fantasy game and PrizePicks is my preferred provider for daily fantasy. I expect Michigan will protect my right to play daily fantasy on PrizePicks. Please remove the proposition selection ban from the proposed Michigan Fantasy Games Rules.

Harns, Wendy B. (MGCB)

From: Rodolfo Pena <rodpena3@gmail.com>
Sent: Wednesday, January 5, 2022 11:32 AM
To: MGCB-Rules
Subject: Michigan Resident Against the Proposition Selection Ban

CAUTION: This is an External email. Please send suspicious emails to abuse@michigan.gov

My name is Rodolfo Pena and I am a Michigan resident. I am opposed to MGCB's proposed fantasy contest rule banning proposition selection fantasy games. Proposition selection is my preferred fantasy game and PrizePicks is my preferred provider for daily fantasy. I expect Michigan will protect my right to play daily fantasy on PrizePicks. Please remove the proposition selection ban from the proposed Michigan Fantasy Games Rules.

Harns, Wendy B. (MGCB)

From: Ryan Dove <ryandove79@icloud.com>
Sent: Wednesday, January 5, 2022 1:34 PM
To: MGCB-Rules
Subject: Michigan Resident Against the Proposition Selection Ban

CAUTION: This is an External email. Please send suspicious emails to abuse@michigan.gov

My name is Ryan Dove } and I am a Michigan resident. I am opposed to MGCB's proposed fantasy contest rule banning proposition selection fantasy games. Proposition selection is my preferred fantasy game and PrizePicks is my preferred provider for daily fantasy. I expect Michigan will protect my right to play daily fantasy on PrizePicks. Please remove the proposition selection ban from the proposed Michigan Fantasy Games Rules.

Sent from my iPhone

Harns, Wendy B. (MGCB)

From: Ryan Kelley <ryankelley20@yahoo.com>
Sent: Thursday, January 6, 2022 3:34 AM
To: MGCB-Rules
Subject: Michigan Resident Against the Proposition Selection Ban

CAUTION: This is an External email. Please send suspicious emails to abuse@michigan.gov

My name is Ryan Kelley and I am a Michigan resident. I am opposed to MGCB's proposed fantasy contest rule banning proposition selection fantasy games. Proposition selection is my preferred fantasy game and PrizePicks is my preferred provider for daily fantasy. I expect Michigan will protect my right to play daily fantasy on PrizePicks. Please remove the proposition selection ban from the proposed Michigan Fantasy Games Rules.

Harns, Wendy B. (MGCB)

From: Samuel Wooddell <swooddell@hillsdale.edu>
Sent: Tuesday, January 4, 2022 7:30 PM
To: MGCB-Rules
Subject: Michigan Resident Against the Proposition Selection Ban

CAUTION: This is an External email. Please send suspicious emails to abuse@michigan.gov

My name is Sam Wooddell and I am a Michigan resident. I am opposed to MGCB's proposed fantasy contest rule banning proposition selection fantasy games. Proposition selection is my preferred fantasy game and PrizePicks is my preferred provider for daily fantasy. I expect Michigan will protect my right to play daily fantasy on PrizePicks. Please remove the proposition selection ban from the proposed Michigan Fantasy Games Rules.

Harns, Wendy B. (MGCB)

From: Sam Lusk <lusksamu@gmail.com>
Sent: Wednesday, January 5, 2022 11:35 AM
To: MGCB-Rules
Subject: Michigan Resident AGAINST the Proposition Selection Ban

CAUTION: This is an External email. Please send suspicious emails to abuse@michigan.gov

My name is Samuel A. Lusk and I am a resident of Port Huron, Michigan. I am opposed to MGCB's proposed fantasy contest rule banning proposition selection fantasy games. Proposition selection is my preferred fantasy game and PrizePicks is my preferred provider for daily fantasy. Please remove the proposition selection ban from the proposed Michigan Fantasy Games Rules.

Sincerely,
Samuel A. Lusk
lusksamu@gmail.com

Harns, Wendy B. (MGCB)

From: shaun parrott <fataltim@yahoo.com>
Sent: Wednesday, January 5, 2022 12:55 PM
To: MGCB-Rules
Subject: Michigan Resident Against the Proposition Selection Ban

CAUTION: This is an External email. Please send suspicious emails to abuse@michigan.gov

My name is Shaun Parrott and I am a Michigan resident. I am opposed to MGCB's proposed fantasy contest rule banning proposition selection fantasy games. Proposition selection is my preferred fantasy game and PrizePicks is my preferred provider for daily fantasy. I expect Michigan will protect my right to play daily fantasy on PrizePicks. Please remove the proposition selection ban from the proposed Michigan Fantasy Games Rules.

Harns, Wendy B. (MGCB)

From: simon mansour <simonm8558@aol.com>
Sent: Tuesday, January 4, 2022 8:21 PM
To: MGCB-Rules
Subject: Michigan Resident Against the Proposition Selection Ban

CAUTION: This is an External email. Please send suspicious emails to abuse@michigan.gov

My name is simon mansour and I am a Michigan resident. I am opposed to MGCB's proposed fantasy contest rule banning proposition selection fantasy games. Proposition selection is my preferred fantasy game and PrizePicks is my preferred provider for daily fantasy. I expect Michigan will protect my right to play daily fantasy on PrizePicks. Please remove the proposition selection ban from the proposed Michigan Fantasy Games Rules!!!

Harns, Wendy B. (MGCB)

From: William Hazelrigg <hazelriggwilliam648@gmail.com>
Sent: Monday, January 3, 2022 4:40 PM
To: MGCB-Rules
Subject: Michigan Resident Against the Proposition Selection Ban

CAUTION: This is an External email. Please send suspicious emails to abuse@michigan.gov

My name is Skiry burns and I am a Michigan resident. I am opposed to MGCB's proposed fantasy contest rule banning proposition selection fantasy games. Proposition selection is my preferred fantasy game and PrizePicks is my preferred provider for daily fantasy. I expect Michigan will protect my right to play daily fantasy on PrizePicks. Please remove the proposition selection ban from the proposed Michigan Fantasy Games Rules.

Harns, Wendy B. (MGCB)

From: Stanley Griffith <stanleygriffith30@yahoo.com>
Sent: Wednesday, January 5, 2022 1:15 PM
To: MGCB-Rules
Subject: Michigan Resident Against the Proposition Selection Ban

CAUTION: This is an External email. Please send suspicious emails to abuse@michigan.gov

My name is Stanley Griffith and I am a Michigan resident. I am opposed to MGCB's proposed fantasy contest rule banning proposition selection fantasy games. Proposition selection is my preferred fantasy game and PrizePicks is my preferred provider for daily fantasy. I expect Michigan will protect my right to play daily fantasy on PrizePicks. Please remove the proposition selection ban from the proposed Michigan Fantasy Games Rules.

Harns, Wendy B. (MGCB)

From: Steven H. <uwbadger94@yahoo.com>
Sent: Monday, January 3, 2022 7:50 PM
To: MGCB-Rules
Subject: Michigan Resident Against the Proposition Selection Ban

CAUTION: This is an External email. Please send suspicious emails to abuse@michigan.gov

My name is Steve Heuer and I am a Michigan resident. I am opposed to MGCB's proposed fantasy contest rule banning proposition selection fantasy games. Proposition selection is my preferred fantasy game and PrizePicks is my preferred provider for daily fantasy. I expect Michigan will protect my right to play daily fantasy on PrizePicks. Please remove the proposition selection ban from the proposed Michigan Fantasy Games Rules.

Harns, Wendy B. (MGCB)

From: Steve Esmont <steveesmont@yahoo.com>
Sent: Monday, January 3, 2022 8:54 PM
To: MGCB-Rules
Subject: Michigan Resident Against the Proposition Selection Ban

CAUTION: This is an External email. Please send suspicious emails to abuse@michigan.gov

My name is Steven Esmont and I am a Michigan resident. I am opposed to MGCB's proposed fantasy contest rule banning proposition selection fantasy games. Proposition selection is my preferred fantasy game and PrizePicks is my preferred provider for daily fantasy. I expect Michigan will protect my right to play daily fantasy on PrizePicks. Please remove the proposition selection ban from the proposed Michigan Fantasy Games Rules.

Steve Esmont

Harns, Wendy B. (MGCB)

From: JOSEPH BARANOWSKI <tbaran007@comcast.net>
Sent: Wednesday, January 5, 2022 4:35 PM
To: MGCB-Rules
Subject: Michigan Resident Against the Proposition Selection Ban

CAUTION: This is an External email. Please send suspicious emails to abuse@michigan.gov

My name is Sue Baranowski and I am a Michigan resident. I am opposed to MGCB's proposed fantasy contest rule banning proposition selection fantasy games. Proposition selection is my preferred fantasy game and PrizePicks is my preferred provider for daily fantasy. I expect Michigan will protect my right to play daily fantasy on PrizePicks. Please remove the proposition selection ban from the proposed Michigan Fantasy Games Rules.

Harns, Wendy B. (MGCB)

From: Tanya F. <tanje54@gmail.com>
Sent: Wednesday, January 5, 2022 11:42 AM
To: MGCB-Rules
Subject: Michigan Resident Against the Proposition Selection Ban

CAUTION: This is an External email. Please send suspicious emails to abuse@michigan.gov

My name is Tanya Fitzpatrick and I am a Michigan resident. I am opposed to MGCB's proposed fantasy contest rule banning proposition selection fantasy games. Proposition selection is my preferred fantasy game and PrizePicks is my preferred provider for daily fantasy. I expect Michigan will protect my right to play daily fantasy on PrizePicks. Please remove the proposition selection ban from the proposed Michigan Fantasy Games Rules.

Harns, Wendy B. (MGCB)

From: Mike Dziergas <masher_98@yahoo.com>
Sent: Wednesday, January 5, 2022 11:27 AM
To: MGCB-Rules
Subject: Michigan Resident Against the Proposition Selection Ban

CAUTION: This is an External email. Please send suspicious emails to abuse@michigan.gov

My name is Mike Dziergas and I am a Michigan resident. I am opposed to MGCB's proposed fantasy contest rule banning proposition selection fantasy games. Proposition selection is my preferred fantasy game and PrizePicks is my preferred provider for daily fantasy. I expect Michigan will protect my right to play daily fantasy on PrizePicks. Please remove the proposition selection ban from the proposed Michigan Fantasy Games Rules.

[Sent from Yahoo Mail on Android](#)

Harns, Wendy B. (MGCB)

From: Todd Hooper <theflamingeagle@hotmail.com>
Sent: Wednesday, January 5, 2022 11:35 AM
To: MGCB-Rules
Subject: Michigan Resident Against the Proposition Selection Ban

CAUTION: This is an External email. Please send suspicious emails to abuse@michigan.gov

My name is {todd hooper} and I am a Michigan resident. I am opposed to MGCB's proposed fantasy contest rule banning proposition selection fantasy games. Proposition selection is my preferred fantasy game and PrizePicks is my preferred provider for daily fantasy. I expect Michigan will protect my right to play daily fantasy on PrizePicks. Please remove the proposition selection ban from the proposed Michigan Fantasy Games Rules.

personal addendum from author; i really dont see the difference between this type of venue and the sgps on legalized sportsbooks at all.

Harns, Wendy B. (MGCB)

From: Kahaos Thefinisher <kahaos25@yahoo.com>
Sent: Wednesday, January 5, 2022 11:32 AM
To: MGCB-Rules
Subject: Michigan Resident Against the Proposition Selection Ban

CAUTION: This is an External email. Please send suspicious emails to abuse@michigan.gov

My name is Tomas Lara and I am a Michigan resident. I am opposed to MGCB's proposed fantasy contest rule banning proposition selection fantasy games. Proposition selection is my preferred fantasy game and PrizePicks is my preferred provider for daily fantasy. I expect Michigan will protect my right to play daily fantasy on PrizePicks. Please remove the proposition selection ban from the proposed Michigan Fantasy Games Rules.

Harns, Wendy B. (MGCB)

From: Tony Houle <tonyjhoule@gmail.com>
Sent: Wednesday, January 5, 2022 1:00 PM
To: MGCB-Rules
Subject: Michigan Resident Against the Proposition Selection Ban

CAUTION: This is an External email. Please send suspicious emails to abuse@michigan.gov

My name is Tony Houle and I am a Michigan resident. I am opposed to MGCB's proposed fantasy contest rule banning proposition selection fantasy games. Proposition selection is my preferred fantasy game and PrizePicks is my preferred provider for daily fantasy. I expect Michigan will protect my right to play daily fantasy on PrizePicks. Please remove the proposition selection ban from the proposed Michigan Fantasy Games Rules.

Sent from my iPhone

Harns, Wendy B. (MGCB)

From: Ty Snitgen <tpsnitgen@gmail.com>
Sent: Wednesday, January 5, 2022 11:38 AM
To: MGCB-Rules
Subject: Michigan Resident Against the Proposition Selection Ban

CAUTION: This is an External email. Please send suspicious emails to abuse@michigan.gov

My name is Ty Snitgen and I am a Michigan resident. I am opposed to MGCB's proposed fantasy contest rule banning proposition selection fantasy games. Proposition selection is my preferred fantasy game and PrizePicks is my preferred provider for daily fantasy. I expect Michigan will protect my right to play daily fantasy on PrizePicks. Please remove the proposition selection ban from the proposed Michigan Fantasy Games Rules.

Sent from my iPhone

Harns, Wendy B. (MGCB)

From: Tyler DeBrabander <tylerdebrabander@gmail.com>
Sent: Wednesday, January 5, 2022 12:00 PM
To: MGCB-Rules
Subject: Michigan Resident Against the Proposition Selection Ban

CAUTION: This is an External email. Please send suspicious emails to abuse@michigan.gov

My name is Tyler DeBrabander and I am a Michigan resident.

PrizePicks is a great alternative to the "mobile casino" options that are out there because it sticks to sports based wagers. If you are going to ban anything, ban the casino apps. People lose their money fast and gambling addiction is increasing.

I am opposed to MGCB's proposed fantasy contest rule banning proposition selection fantasy games. Proposition selection is my preferred fantasy game and PrizePicks is my preferred provider for daily fantasy. I expect Michigan will protect my right to play daily fantasy on PrizePicks. Please remove the proposition selection ban from the proposed Michigan Fantasy Games Rules.

Harns, Wendy B. (MGCB)

From: tsikkenga@yahoo.com
Sent: Wednesday, January 5, 2022 12:00 PM
To: MGCB-Rules
Subject: Michigan Resident Against the Proposition Selection Ban

CAUTION: This is an External email. Please send suspicious emails to abuse@michigan.gov

My name is Tyler Sikkenga and I am a Michigan resident. I am opposed to MGCB's proposed fantasy contest rule banning proposition selection fantasy games. Proposition selection is my preferred fantasy game and PrizePicks is my preferred provider for daily fantasy. I expect Michigan will protect my right to play daily fantasy on PrizePicks. Please remove the proposition selection ban from the proposed Michigan Fantasy Games Rules.

Thank you,

Sent from my iPhone

Harns, Wendy B. (MGCB)

From: coachwill79@gmail.com
Sent: Monday, January 3, 2022 3:37 PM
To: MGCB-Rules
Subject: Michigan Resident Against the Proposition Selection Ban

CAUTION: This is an External email. Please send suspicious emails to abuse@michigan.gov

My name is William Puvalowski and I am a Michigan resident. I am opposed to MGCB's proposed fantasy contest rule banning proposition selection fantasy games. Proposition selection is my preferred fantasy game and PrizePicks is my preferred provider for daily fantasy. I expect Michigan will protect my right to play daily fantasy on PrizePicks. Please remove the proposition selection ban from the proposed Michigan Fantasy Games Rules.

Sent from my iPhone

Harns, Wendy B. (MGCB)

From: William Tharpe Jr <williamtharpejr@gmail.com>
Sent: Wednesday, January 5, 2022 12:17 PM
To: MGCB-Rules
Subject: Michigan Resident Against the Proposition Selection Ban

CAUTION: This is an External email. Please send suspicious emails to abuse@michigan.gov

My name is William Tharpe Jr and I am a Michigan resident. I am opposed to MGCB's proposed fantasy contest rule banning proposition selection fantasy games. Proposition selection is my preferred fantasy game and PrizePicks is my preferred provider for daily fantasy. I expect Michigan will protect my right to play daily fantasy on PrizePicks. Please remove the proposition selection ban from the proposed Michigan Fantasy Games Rules.

Harns, Wendy B. (MGCB)

From: wjylaw@aol.com
Sent: Monday, January 3, 2022 3:33 PM
To: MGCB-Rules
Subject: Michigan Resident Against the Proposition Selection Ban

CAUTION: This is an External email. Please send suspicious emails to abuse@michigan.gov

My name is William Yochim and I am a Michigan resident. I am opposed to MGCB's proposed fantasy contest rule banning proposition selection fantasy games. Proposition selection is one of my preferred fantasy games and PrizePicks is one of my preferred providers for daily fantasy. I expect Michigan will protect my right to play daily fantasy on PrizePicks. Please remove the proposition selection ban from the proposed Michigan Fantasy Games Rules.

Thank you for your consideration,

William Yochim

Harns, Wendy B. (MGCB)

From: William Zalokar <zalokarw@gmail.com>
Sent: Monday, January 3, 2022 6:27 PM
To: MGCB-Rules
Subject: Michigan Resident Against the Proposition Selection Ban

CAUTION: This is an External email. Please send suspicious emails to abuse@michigan.gov

My name is William Zalokar and I am a Michigan resident. I am opposed to MGCB's proposed fantasy contest rule banning proposition selection fantasy games. Proposition selection is my preferred fantasy game and PrizePicks is my preferred provider for daily fantasy. I expect Michigan will protect my right to play daily fantasy on PrizePicks. Please remove the proposition selection ban from the proposed Michigan Fantasy Games Rules.

Sent from my iPhone

Harns, Wendy B. (MGCB)

From: SuperFlexerFF <superflexerff@gmail.com>
Sent: Wednesday, January 5, 2022 12:03 PM
To: MGCB-Rules
Subject: Michigan Resident Against the Proposition Selection Ban

CAUTION: This is an External email. Please send suspicious emails to abuse@michigan.gov

My name is Zach Fifelski and I am a Michigan resident. I am opposed to MGCB's proposed fantasy contest rule banning proposition selection fantasy games. Proposition selection is my preferred fantasy game and PrizePicks is my preferred provider for daily fantasy. I expect Michigan will protect my right to play daily fantasy on PrizePicks. Please remove the proposition selection ban from the proposed Michigan Fantasy Games Rules.

Thank you,
-Zach

Harns, Wendy B. (MGCB)

From: Zach Karns <zachkarns@gmail.com>
Sent: Wednesday, January 5, 2022 11:57 AM
To: MGCB-Rules
Subject: Michigan Resident Against the Proposition Selection Ban

CAUTION: This is an External email. Please send suspicious emails to abuse@michigan.gov

My name is Zach Karns and I am a Michigan resident. I am opposed to MGCB's proposed fantasy contest rule banning proposition selection fantasy games. Proposition selection is my preferred fantasy game and PrizePicks is my preferred provider for daily fantasy. I expect Michigan will protect my right to play daily fantasy on PrizePicks. Please remove the proposition selection ban from the proposed Michigan Fantasy Games Rules.