

**Harns, Wendy B. (MGCB)**

---

**From:** Alex <aklocko@hotmail.com>  
**Sent:** Tuesday, March 7, 2023 2:25 PM  
**To:** MGCB-Rules  
**Subject:** Proposed Millionaire Party Rules Amendments

**CAUTION: This is an External email. Please send suspicious emails to [abuse@michigan.gov](mailto:abuse@michigan.gov)**

Hi,

I am Alex Klocko with KLOCKO LLC, the supplier at All Star Lanes in Walled Lake.

I have a few questions about the proposed rule changes.

~~director will issue a license.~~

~~(2) Subject to subrule (3) of this rule, the executive director may authorize up to 2 millionaire party event per location per day.~~

~~(3) The executive director may set the maximum number of days that a millionaire party can be held at a particular location. There shall not be more than 4 event days per week.~~

1. Do these strikethroughs mean that we are no longer limited to 2 charities per day? Are we allowed to run events all 7 days of the week at the same location? Is there still a limit of one charity at a time? Do the charities still have a limit of 4 consecutive days per event?

~~(8) Unless otherwise permitted by law, each millionaire party licensee shall not have more than \$15,000.00 \$20,000.00 in imitation money or chips in a demarcated area. may be sold in 1 day of a millionaire party.~~

~~(9) Not more than \$15,000.00 in imitation money or chips shall be permitted in a demarcated area.~~

2. Does this rule change imply that we are no longer limited to selling \$20,000 total in chips? For instance, I read this as if we have \$20k chips sold and in play, then a player cashes out \$3k, we are able to resell those \$3k as long as we keep under the \$20k in the demarcated area rule. Is that correct? How does the rake play into that number?
3. I see that the location fee remained the same at \$250/day, but I do not see anything about the supplier limits. Are there proposed changes to the supplier maximums with these changes?

I also have a couple of suggestions:

1. Our room specifically is limiting our charities' productivity significantly due to the lack of chips available. An increase in the amount of chips we are able to sell, potentially to \$30,000, would go a long way in helping our charities maximize their potential during their events.

2. With an increase in chips, an increase in the supplier maximum would also be appreciated.
3. Our dealers would really benefit from the ability to accept tips in chips. Even if it is a cup or bin that sits at the table that the charity can come pick up at the end of a rotation and exchange. Maybe that is something that can also be altered.
4. Facebook posts and online promotion of the charity rooms seems to be a grey area at this point. If possible, I think that it would be helpful to the charities and the rooms if online posting was permitted for events in the future.

Thank you very much for the update on the rules changes,

I look forward to hearing back from you soon,

Alex Klocko  
(248) 891-5425

## Harns, Wendy B. (MGCB)

---

**From:** Alex <aklocko@hotmail.com>  
**Sent:** Thursday, March 9, 2023 3:21 PM  
**To:** MGCB-Rules  
**Subject:** Re: Proposed Millionaire Party Rules Amendments

**CAUTION: This is an External email. Please send suspicious emails to [abuse@michigan.gov](mailto:abuse@michigan.gov)**

Hi again,

One more suggestion I really think could help our charities. Giving each charity more than 4 eligible events per year. I think we are limiting the potential of our charities with the current restrictions.

Looking forward to hearing from you,

Alex

**From:** Alex  
**Sent:** Tuesday, March 7, 2023 2:25 PM  
**To:** MGCB-Rules@michigan.gov <MGCB-Rules@michigan.gov>  
**Subject:** Proposed Millionaire Party Rules Amendments

Hi,

I am Alex Klocko with KLOCKO LLC, the supplier at All Star Lanes in Walled Lake.

I have a few questions about the proposed rule changes.

~~Director will issue a license.~~

~~(2) Subject to subrule (3) of this rule, the executive director may authorize up to 2 millionaire party event per location per day.~~

~~(3) The executive director may set the maximum number of days that a millionaire party can be held at a particular location. There shall not be more than 4 event days per week.~~

1. Do these strikethroughs mean that we are no longer limited to 2 charities per day? Are we allowed to run events all 7 days of the week at the same location? Is there still a limit of one charity at a time? Do the charities still have a limit of 4 consecutive days per event?

**(8) Unless otherwise permitted by law, each millionaire party licensee shall not have more than \$20,000.00 in imitation money or chips in a demarcated area. may be sold in 1 day of a millionaire party.**

~~(9) Not more than \$15,000.00 in imitation money or chips shall be permitted in a demarcated area.~~

2. Does this rule change imply that we are no longer limited to selling \$20,000 total in chips? For instance, I read this as if we have \$20k chips sold and in play, then a player cashes out \$3k, we are able to resell those \$3k as long as we keep under the \$20k in the demarcated area rule. Is that correct? How does the rake play into that number?
3. I see that the location fee remained the same at \$250/day, but I do not see anything about the supplier limits. Are there proposed changes to the supplier maximums with these changes?

I also have a couple of suggestions:

1. Our room specifically is limiting our charities' productivity significantly due to the lack of chips available. An increase in the amount of chips we are able to sell, potentially to \$30,000, would go a long way in helping our charities maximize their potential during their events.
2. With an increase in chips, an increase in the supplier maximum would also be appreciated.
3. Our dealers would really benefit from the ability to accept tips in chips. Even if it is a cup or bin that sits at the table that the charity can come pick up at the end of a rotation and exchange. Maybe that is something that can also be altered.
4. Facebook posts and online promotion of the charity rooms seems to be a grey area at this point. If possible, I think that it would be helpful to the charities and the rooms if online posting was permitted for events in the future.

Thank you very much for the update on the rules changes,

I look forward to hearing back from you soon,

Alex Klocko  
(248) 891-5425

## Harns, Wendy B. (MGCB)

---

**From:** Bob Stoeckle <stoeckleb@msn.com>  
**Sent:** Thursday, March 9, 2023 7:32 AM  
**To:** MGCB-Rules  
**Subject:** Rule changes

CAUTION: This is an External email. Please send suspicious emails to [abuse@michigan.gov](mailto:abuse@michigan.gov)

Not even wasting my time reading the changes. I am from a small organization and went through the process of securing and getting approved for millionaire party games. My experience has been. The rules are so stacked in favor of big-time casinos, and not taking things away from them that they are a release, burdensome and complicated. We will never have another millionaire party in our organization.

Sent from my iPhone

## Harns, Wendy B. (MGCB)

---

**From:** GARY DAVIS <garydavis@centurytel.net>  
**Sent:** Wednesday, March 15, 2023 10:46 AM  
**To:** MGCB-Rules  
**Subject:** Millionaire Parties Draft Rule Changes

**CAUTION: This is an External email. Please send suspicious emails to [abuse@michigan.gov](mailto:abuse@michigan.gov)**

Good morning,

After reviewing the proposed changes to Millionaire Party rules (2022-31 TY Millionaire Parties Draft Rules) I found the draft changes to be VERY positive. They remove or modify many of the previous rules that seemed to have little or no value in providing a Millionaire Party event.

There is one area that I noted what seems to be an inconsistent change: Demarcated Areas

Under the draft rules the definition of a Demarcated Area is deleted (R432.101 (k) Which is appropriate.

The inconsistencies come under "demarcated areas" still being used in the following rules:

R432.306 (8)

R432.310 (7)(f)

R432.317 (4)

If the draft rules become the new rules hopefully it will follow that many of the application process supplemental information will not be required to be submitted in the future.

Sincerely,

Gary W. Davis  
906-748-0456

## Harns, Wendy B. (MGCB)

---

**From:** fieroang@chartermi.net  
**Sent:** Wednesday, April 12, 2023 2:33 PM  
**To:** MGCB-Rules  
**Subject:** Comments on Proposed Rules Changes  
**Attachments:** MGCB RULE CHANGE LETTER TO ALL NON-PROFITS.doc

**CAUTION: This is an External email. Please send suspicious emails to [abuse@michigan.gov](mailto:abuse@michigan.gov)**

Attached, please find some comments on the proposed administrative rules changes. I know I speak for other non-profits when it comes to these changes. Please consider these comments before you make these changes permanent.

Thank you for your consideration.

Joseph Gardner, Commander  
American Legion Post 468  
1219 Flint St.  
Saint Charles, MI 48655-1824  
989 860-9994  
fieroang@chartermi.net

Hello brother and sister Non Profits!

We are reaching out to you today to ask you to show your support for the Administrative rule changes (listed below) regarding Charitable Gaming in Michigan. You can show your support for these changes simply by replying to this email with your Organization Name, email address, contact name and phone number. Your information will only be used should the State wish to confirm your support.

Today, April 12, 2023, the Michigan Charitable Gaming Association (MiCGA) will be representing Michigan Non-Profits at a meeting regarding potential rule changes with the Michigan Gaming Control Board (MGCB). The following are rules we support changing.

- 1) **Advertising:** Non-profits hosting Charitable Gaming Events are required to follow advertising rules that are not applicable to other fund-raising projects nor are they applicable to other Gaming Industries such as tribal and non-tribal casinos. We support a change in advertising rules that are equal to any other fund-raising projects or any other tribal or non tribal gaming events.
- 2) **Tipping with Chips:** Using chips for tips is a Gaming Industry standard yet for some reason that we have been unable to determine, the MGCB rules require non-profits to tell patrons they are not allowed to tip with chips that they have purchased on a dollar for dollar basis (\$1 = \$1 chip etc). The reason for tipping dealers with chips is the simplicity of it. Patrons, as a general rule, do not ask charities for dollar bill change as often as they might throw a one dollar chip for a tip. That is why it is a Gaming Industry standard practice. In regard to security, there is no more secure way to tip than to have a lock box on the table for all to see (charities, players, dealers and floor managers etc) and require the



players themselves to drop their tip chips into a locked box that only the host Charity can open, count and redeem. The charity then hands the tip to the Dealer (dealer never touches the tip chips). Anything less simply encourages dealers (after being trained) to move on to casinos or illegal home games where they can make more money. We support asking for nothing more than what is gaming industry standard. Good Dealers mean more funds raised for the non-profits. Dealers should not be encouraged to move on because of unfair tipping rules.

- 3) **Small business income caps:** Many, if not most, non-profits use a licensed Supplier to work these events for us. Suppliers provide equipment (poker tables, chips and other necessary supplies) as well as dealers and floor management etc. In other word these small businesses bear the burden/cost of these events while non-profits provide a minimum of two member volunteers who for the most part sell and redeem chips. To protect non-profits the MGCB requires a 55% (Charity) and 45% (Supplier) split which is fair and understandable. However there is a double cap on the Supplier. They are also limited to \$900 per day or \$3600 for a four day event regardless of the effort/investment they put into it.. We need these small businesses to succeed; to do the best they can for us. We need to give them incentive, not stifle them. We support the 55/45% rule but we also support the elimination of the daily/event cap.

PLEASE RESPOND WITH YOUR SUPPORT

TODAY...HELP US HELP EACH OTHER....THANK YOU

## Harns, Wendy B. (MGCB)

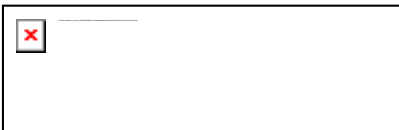
---

**From:** MiCGA Managing Director <Kate@micga.org>  
**Sent:** Tuesday, April 11, 2023 3:03 PM  
**To:** MGCB-Rules  
**Subject:** re: Public Comment on proposed changes to Millionaire Parties Rule Set #2022-31 TY  
**Attachments:** MiCGA - MGCB Admin Rules\_Comments\_041123.pdf

**CAUTION: This is an External email. Please send suspicious emails to [abuse@michigan.gov](mailto:abuse@michigan.gov)**

Please see the attached, and please let us know if anything else is required.

Thank you,



Michigan Charitable Gaming Association (MiCGA)  
Katharine M. Hude  
Executive Director

824 North Capitol Avenue  
Lansing, MI 48906

517.253.0897 (o)  
517.913.6024 (f)  
[micga.org](http://micga.org)





**Mission**

MiCGA's mission is to advocate for and educate our members, legislators, and the general public on matters related to charitable gaming, so as to preserve the positive impact charitable gaming has on our communities.

**Board of Directors**

**Chair:**  
**Michael Horvath**  
*Knights of Columbus St. Martha Council*

**Vice Chair:**  
**Ron Pioch** *Knights of Columbus Council #7311*

**Treasurer:**  
**Dane Nickols**  
*Laingsburg Lions Club*

**Secretary:**  
**Kim Spalsbury**  
*Grand Ledge Lions Club*

**Jim Dalton**  
*Kiwanis Club of Lansing*

**Joseph Gardner**  
*American Legion Post 468*

April 11, 2023

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

**VIA EMAIL**  
 MGCB-Rules@michigan.gov

Dear Ms. Harns:

Please accept this letter as public comment on proposed changes to the Millionaire Parties rule set (pending rule set#: 2022-31 TY).

On behalf of the Michigan Charitable Gaming Association (MiCGA), thank you for updating this rule set and allowing for an open and transparent process. MiCGA respectfully requests the Board to consider additional changes to the pending rules which are outlined in red in the attached document.

MiCGA requests these changes be considered for several reasons such as:

**TiJm.in.g**

- Allowing tipping with chips would reduce mistakes happening in process of exchanging chips for cash.
- Pilots have proven security measures are not compromised, particularly if a secure box at the table is used.
- Aligns practices with other professional casino gaming activities, allowing charitable gaming to be on an even playing field; thus, incentivizing professional dealers to continue participation with charitable gaming operations.

**Advertising**

- Updates practices to reflect practical ways participants in charitable gaming gather information (online versus printed material).

Thank you for considering these public comments and suggested changes. MiCGA welcomes any questions or further discussions with any MGCB members or staff.

Sincerely,



Katharine M. Hude  
 MiCGA Executive Director

MiCGA  
 824 North Capitol Avenue  
 Lansing, MI 48906  
 517.253.0897 (o)  
 517.913.6024 (f)  
 micga.org  
 info@micga.org

## **Michigan Charitable Gaming Association {MiCGA) - Proposal for Administrative Rules re. Tipping & Advertising**

---

### **TIPPING**

#### **Current Rule:**

#### **R 432.309 Imitation money and chips.**

Rule 309. (1) During the conduct of a millionaire party, only imitation money or chips shall be used by the participants. Imitation money or chips shall be used solely for wagering or redemption purposes.

(2) Imitation money or chips shall not be used for tipping or the purchase of food, beverages, raffle tickets, charity game tickets, numeral game tickets, or non-gaming items.

(3) Imitation money or chips shall only be sold by the qualified organization.

(4) Imitation money or chips shall not be sold by dealers.

(5) Imitation money or chips shall only be redeemed at authorized redemption areas.

(6) Only imitation money and chips that have received the executive director's prior approval may be used at a millionaire party.

(7) The executive director may set the maximum amount of chips or imitation money that a qualified organization may sell to an individual at a millionaire party.

(8) Not more than \$15,000.00 in imitation money or chips may be sold in 1 day of a millionaire party.

(9) Not more than \$15,000.00 in imitation money or chips shall be permitted in a demarcated area.

#### **MGCB Proposed Rule:**

#### **R 432.309 Imitation money and chips.**

Rule 309. (1) During the conduct of a millionaire party, only imitation money or chips shall be used by the participants. Imitation money or chips shall be used solely for wagering or redemption purposes.

(2) Imitation money or chips shall not be used for tipping or the purchase of food, beverages, raffle tickets, charity game tickets, numeral game tickets, or non-gaming items.

(3) Imitation money or chips shall only be sold by the **millionaire party licensee** qualified organization.

(4) Imitation money or chips shall not be sold by dealers.

(5) Imitation money or chips shall only be redeemed at authorized redemption areas.

(6) Only imitation money and chips that have received the executive director's prior approval may be used at a millionaire party.

(7) The executive director may set the maximum amount of chips or imitation money that a qualified organization **millionaire party licensee** may sell to an individual at a millionaire party.

(8) **Unless otherwise permitted by law, each millionaire party licensee shall not Net: have more than \$15,000.00 \$20,000.00 in imitation money or chips in a demarcated area. may be sold in 1 day of a millionaire party.**

(9) Not more than \$15,000.00 in imitation money or chips shall be permitted in a demarcated area.

#### **MiCGA Proposed Rule:**

#### **R 432.309 Imitation money and chips.**

Rule 309. (1) During the conduct of a millionaire party, only imitation money or chips shall be used by the participants. Imitation money or chips shall be used solely for wagering, **tipping**, or redemption purposes.

(2) Imitation money or chips shall not be used for **tipping or** the purchase of food, beverages, raffle tickets, charity game tickets, numeral game tickets, or non-gaming items.

(3) **Imitation money or chips used for the express purpose of tipping of dealers shall be conducted in a manner that includes a secure lockbox. Dealers are prohibited from placing chips inside or taking chips out of any secure lockbox. Only the millionaire party licensee may remove imitation money or chips from the secure lockbox for the purpose of dealer tip redemption.**

(-3 4) Imitation money or chips shall only be sold by the **millionaire party licensee**.

(4 5) Imitation money or chips shall not be sold by dealers.

(-5 6) Imitation money or chips shall only be redeemed at authorized redemption areas.

(6 7) Only imitation money and chips that have received the executive director's prior approval may be used at a millionaire party.

(::J8) The executive director may set the maximum amount of chips or imitation money that a **millionaire party licensee** may sell to an individual at a millionaire party.

(8 9) **Unless otherwise permitted by law, each millionaire party licensee shall not have more than \$20,000.00 in imitation money or chips in a demarcated area.**

---

## ADVERTISING

### Current Rule:

#### **R 432.319 Advertising.**

Rule 319. (1) Expenditures by the millionaire party licensee for advertising the millionaire party shall be necessary and reasonable.

(2) A licensee may advertise a millionaire party using current and accurate information. The advertising shall include all of the following:

(a) Name of the licensee.

(b) License number.

(c) Purpose for which the net proceeds will be used.

(3) Advertising shall cease once the millionaire party license has expired.

(4) Advertising via the internet, printed matter, signs, or billboards shall be in the following format:

(a) Information in subrule (2) of this rule shall appear in the top half of the advertisement.

(b) Excluding location name, information in subrule (2) of this rule shall be prominently displayed in the same size font, or larger, as the largest font of any other information contained in the advertisement.

(5) Information in subrule (2) of this rule shall be continuously visible and readable in Page 21 Courtesy of [www.michigan.gov/orr](http://www.michigan.gov/orr) television advertising.

(6) The lessor, location owner, or licensee shall not advertise the dates or times the location is open for the purpose of conducting a millionaire party or the games that will be played at that location unless all the information required in subrule (2) of this rule is contained in the advertising.

(7) The following items are not considered advertising:

(a) A message on an answering machine or voicemail by the lessor, location owner, or licensee at a location where a millionaire party will occur.

(b) Video, audio, or other means of communication that is broadcast solely within the interior of a location where the millionaire party occurs.

(c) Printed matter contained within the interior of a location where a millionaire party occurs and that is intended to be visible only from the interior of the location where the millionaire party will occur.

(d) An internet webpage that does not mention days, dates, times, specific games played, or program information.

(e) A sign located on the property of a location where a millionaire party occurs that does not mention days, dates, times, specific games played, or game program information.

### **R 432.410 Advertising.**

Rule 410. A licensed supplier shall not advertise a millionaire party.

### **MGCB Proposed Rule**

No Changes proposed by MGCB for R 432.319 & R 432.410 Advertising.

### **MiCGA Proposed Rule**

Rule 319. (1) Expenditures by the millionaire party licensee for advertising the millionaire party shall be necessary and reasonable.

(2) A **millionaire party** licensee may advertise a millionaire party using current and accurate information. The advertising shall include all of the following:

- (a) Name of the **millionaire party** licensee.
- (b) License number.
- (c) **Date(s) of the millionaire party licensee's event.**
- (d) **Location of the millionaire party licensee's event.**
- (e) Purpose for which the net proceeds will be used.

(3) Advertising shall cease once the millionaire party license has expired.

(4) Advertising via the internet, printed matter, signs, or billboards shall be in the following format:

(a) Information in subrule (2) of this rule shall appear in the top half of the advertisement.

(b) Excluding location name. Information in subrule (2) of this rule shall be prominently displayed in the same size font, or larger, as the largest font of any other information contained in the advertisement.

(5) Information in subrule (2) of this rule shall be continuously visible and readable in television advertising.

(6) The lessor, location owner, **licensed supplier and/or millionaire party licensee shall not may** advertise the **days, dates, or times** the location is open for the purpose of conducting a millionaire party; **specific games played; and program information, but any such advertisement must state that the millionaire party event is being conducted for a charitable purpose. or the games that will be played at that location unless all the information required in subrule (2) of this rule is contained in the advertising.**

(7) The following items are not considered advertising:

- (a) A message on an answering machine or voicemail by the lessor, location owner, or **millionaire party** licensee at a location where a millionaire party will occur.



(b) Video, audio, or other means of communication that is broadcast solely within the interior of a location where the millionaire party occurs.

(c) Printed matter contained within the interior of a location where a millionaire party occurs and that is intended to be visible only from the interior of the location where the millionaire party will occur.

(d) An internet webpage that does not mention days, dates, times, specific games played, or program information.

(e) A sign located on the property of a location where a millionaire party occurs that does not mention days, dates, times, specific games played, or game program information.

**R 432.410 Advertising.**

Rule 410. A licensed supplier shall not advertise a millionaire party.

**Harns, Wendy B. (MGCB)**

---

**From:** LISA BARATTA <baratta5@comcast.net>  
**Sent:** Thursday, March 16, 2023 10:16 AM  
**To:** MGCB-Rules  
**Subject:** PROPOSED RULE CHANGES

**CAUTION: This is an External email. Please send suspicious emails to [abuse@michigan.gov](mailto:abuse@michigan.gov)**

Good Afternoon,

I have reviewed the proposed rule changes and wish to add the following proposed changes:

1. It is time to allow suppliers the right to advertise. The rules on advertising are antiquated. What other business is not allowed the fundamenta right to advertise their business? Without the ability to advertise, it is nearly impossible for a new supplier to successfully open up a new room. Suppliers are already at a financial disadvantage since their profits are capped and they are required to give the charity 55% of the event profits. Moreover, suppliers have to compete with casinos, online gaming and illegal home games. Individuals that run home games brazenly advertise their games that offer free food, alcohol and drugs. Limiting advertising increases the workload of your staff. They have to constantly "police" the complaints of "illegal advertising" -what a waste of work hours. What is the reasoning behind this antiquated rule?
2. Allow chip tipping. Chip tipping is better for the charities and the dealers. It is better for the dealers because they will make more money. It is better for the charities because it means less transactions. Fewer transactions equals fewer mistakes. The charity is constantly redeeming chips so players can tip the dealers in cash. I realized that the state is concerned about theft and the dealers access to the chips. Systems have been proposed to avoid this... lock boxes, etc.

Respectfully submitted,

Lisa Baratta  
River Poker Supply, LLC

## Harns, Wendy B. (MGCB)

---

**From:** Pamala Young <vfwpost2269@gmail.com>  
**Sent:** Wednesday, March 8, 2023 4:06 PM  
**To:** MGCB-Rules  
**Subject:** Rules for Millionaire Parties changes  
**Attachments:** MGCB corrections for March 2023 rule changes.docx

**CAUTION: This is an External email. Please send suspicious emails to [abuse@michigan.gov](mailto:abuse@michigan.gov)**

Hello Wendy,

I have attached my suggestions for changes to the Administrative Rules for Millionaire Parties, Rule Set 2022-31 TY.

Pamala Young

Sent from [Mail](#) for Windows

For consistency, I think that **person** should be replaced with individual and **persons** should be replaced with individuals in the following rules:

R 432.109 (p) The failure to continuously operate as a qualified organization as defined by the act and as represented to the executive director by means of the information submitted to the executive director as required by R 432.201, or the failure to continuously operate as an organization or **persons** issued a license under section 34 of the act, MCL 432.134.

R 432.112 (5) The **person or persons** that have been served with a contested case hearing notice may file a written answer before the date set for the contested case hearing or may appear at the contested case hearing and present an oral statement on the charges contained in the contested case hearing notice. If written briefs or arguments are presented, then a copy shall be served on the hearing officer not less than 5 days before the date set for the contested case hearing.

R 432.112 (6) If the **person or persons** that have been previously served with a contested case hearing notice fail to appear at the contested case hearing, then the hearing officer may proceed with the contested case hearing and may, on the evidence presented, make a decision.

R 432.310 (7) (f) Ensuring only authorized **persons** are present in the demarcated area.

R 432.316 (4) (c) Be made payable to a specific **person**, business, partnership, corporation, or account.

Thank you for checking into these discrepancies.

Pamala Young

## Harns, Wendy B. (MGCB)

---

**From:** Sandie Morse <sandie@morseholdingsllc.com>  
**Sent:** Tuesday, April 11, 2023 4:22 PM  
**To:** MGCB-Rules  
**Subject:** Millionaire Party rules-public hearing

CAUTION: This is an External email. Please send suspicious emails to [abuse@michigan.gov](mailto:abuse@michigan.gov)

Hello, my name is Sandie Morse and I am a supplier in West Michigan. Regrettably, I cannot be present on April 12 for the public hearing. I appreciate the opportunity to express my opinions and concerns regarding the current wording and rules.

I am sure many have expressed concern about the limitations and excessive work that the current "chips for tips" policy imposes. Currently all of the casinos in the state are allowed to use chips to tip dealers. The players are used to this method and they prefer it to the extra effort of redeeming chips one or two at a time and delaying the game while they do so. The charity also suffers in this scenario, as they are constantly having to redeem very small amounts multiple times in an hour, which opens the door for human error and their attention is focused on this mundane task instead of focusing on the transactions that impact their financial success of the event. Ultimately, the dealers suffer the most. They all work service positions and depend on tips from players to survive. The inconvenience of the current system does cut down on the tips that are receiving and it slows the game down so fewer hands are played, tipped on, and even raked.

The second issue I would like to weigh in on is the limitations that are put on the charities and the suppliers in regards to advertising. The success of new rooms and existing rooms are incredibly limited if suppliers are not able to advertise for our charity events. Word of mouth only goes so far to let players know what games are available. In a time where social media is free and people are constantly checking, it only seems reasonable that we should be able to post regular games on behalf of our charities. In the long run, it is the charities that will benefit the most from allowing effective advertising.

Thank you for taking the time to read my positions on these issues.

Sandra Morse  
MAX Entertainment LLC

**From:** [Jeanne Volkers](#)  
**To:** [MGCB-Rules](#)  
**Subject:** What do the crossed out items mean  
**Date:** Tuesday, March 7, 2023 1:55:49 PM

---

**CAUTION: This is an External email. Please send suspicious emails to [abuse@michigan.gov](mailto:abuse@michigan.gov)**

New rules??  
Can someone please explain  
Thank you  
Jeanne Volkers

[Sent from Yahoo Mail on Android](#)

**From:** [Pat](#)  
**To:** [MGCB-Rules](#)  
**Subject:** Millionaire Party Draft Rules  
**Date:** Monday, March 20, 2023 3:14:32 PM

---

**CAUTION: This is an External email. Please send suspicious emails to [abuse@michigan.gov](mailto:abuse@michigan.gov)**

I have read these draft rules and there are many non specific changes that give me pause. Being a charity the non specific changes could have a direct affect on us. Mainly the changes that the Executive Director has sole discretion to the decision process is concerning to me, these are the rules that currently have a sense of direction. I would like to receive a copy of the final draft that would be presented at the Public Hearing, this would help ease my concerns. Thank You.

Sent from [Mail](#) for Windows 10