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St. Angela Merici Parish

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September 12, 2011

Mary R. Sprunk Office of Chief Counsel Department of Revenue PO Box 281061 Harrisburg, PA 17128-1061

## Dear Ms. Sprunk,

I am writing you this letter in response to the proposed rules relating to Small Games of Chance that were published in the PA Bulletin on Saturday August 27<sup>th</sup>. I am the manager of our weekly Parish BINGO which is one of our key Parish fundraisers. Our Parish depends on our BINGO fundraising to help cover costs associated with Parish Service Ministries, building maintenance, infrastructure repairs, and other planned and unplanned costs. One of the main components of our weekly Parish BINGO fundraiser is the Small Games of Chance to which the proposed rules would apply. The proposed rules would negatively affect our weekly Parish BINGO fundraising and place added hardship on our Parish to cover the aforementioned costs.

The enhanced invoicing requirements will surely cause our Distributors costs to rise which will be passed on to our Parish. The proposed rules will create an administrative nightmare for our Distributor and would negatively impact the Distributor who is a small business employer in our area.

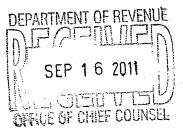
The rules would eliminate the variety packs with one form number and different names. These are some of our customer's favorite Small Games of Chance options. Having one form with multiple names provides our customers with variety and simplifies sales.

The rules would eliminate the options on the seal which places restrictions on our payout structures. Our customers enjoy having different payout options available. There is no good reason that the Commonwealth should regulate how our non-profit organization structures the payouts to our customers. Additionally PA would be the only state having such a requirement placing additional financial burden on us and our Distributor.

In summary we rely on our weekly Parish BINGO and Small Games of Chance as a key fundraiser. Our after cost margin is already small. The proposed rules will increase our costs, further diminish our margin and place added financial burden on our Parish. The added financial burden will force our Parish to make difficult choices when it comes to our Service Ministries, building maintenance, equipment repairs, and other planned and unplanned costs. Our service Ministries provide valuable services to our Parish members and Community. Our Parish is already struggling financially and the proposed rules will only add to our financial difficulties. Please do not enact the proposed rules as this will negatively impact our Parish and Community.

Very Sincerely,

leyer **Bill** Olevar **BINGO Manager** 



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