



KEYSTONE BINGO SUPPLY

PO BOX 350, 1625 JOHN BRADY DR., MUNCY, PA 17756

(#2)

2905

September 22, 2011

Department of Revenue
PO Box 281061
Harrisburg, PA 17128-1061

ATTN: Mary R. Sprunk
Office of Chief Counsel

Dear Ms. Sprunk:

I have reviewed all thirteen pages of the Proposed Rulemakings, Department of Revenue [61 PA. Code Ch. 901] Local Option Small Games of Chance [41 Pa.B. 4638][Saturday, August 27, 2011], and have many concerns that I would like to share with you and also further clarification on a number of items, all of which are listed below.

901.23. Restriction of sales.

(a) *Manufacturers.*

(2) *Sales.* The proposal reads as follows: *A registered manufacturer may only sell, offer for sale or furnish games of chance that [have been approved by the Department for sale] the Department has approved for use in this Commonwealth. A registered manufacturer may only sell, offer for sale or furnish approved games of chance for sale or use in this Commonwealth to a licensed distributor. This paragraph does not apply to the sale of raffle, daily drawing or weekly drawing tickets.*

Our concern: We are a registered manufacturer in the state of Pennsylvania and all of our games that are for sale in the state of Pennsylvania are submitted to the state for approval prior to their release to licensed distributors in the Commonwealth or to a licensed eligible organization. This could be interpreted as a PA registered manufacturer only being allowed to sell PA approved games. I'm sure that is not what is meant.

(b) *Distributors.*

(2) *Sales.* The proposal reads as follows: *A licensed distributor may only sell, offer for sale or furnish approved games of chance [for use] within this Commonwealth to another licensed distributor or to a licensed eligible organization. This paragraph does not apply to the sale of raffle, daily drawing or weekly drawing tickets.*

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DEPARTMENT OF REVENUE
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SEP 26 2011
OFFICE OF CHIEF COUNSEL

Our concern: We are a licensed distributor in several states. Our manufacturers sell us games that are approved in Pennsylvania for our Pennsylvania customers. But we also buy games that are not approved in Pennsylvania, but are for our New York and New Jersey customers. This paragraph could be interpreted as saying we are only being permitted to purchase PA approved games. I'm sure you didn't mean that, but I did want to bring it to your attention.

(3) *Purchase.* The proposal reads as follows: A licensed distributor may only purchase approved games of chance for **[resale] sale** in this Commonwealth from a registered manufacturer or licensed distributor. This paragraph does not apply to the purchase of raffle, daily drawing or weekly drawing tickets.

Our concern: Again, this paragraph could be misconstrued to say that as a licensed distributor in Pennsylvania, we can only purchase approved games from registered manufacturers or licensed distributors within the Commonwealth. Let me give you a scenario that will better illustrate my concern with this. A game is approved in PA by the Department of Revenue and is sold to us and an Ohio distributor. The Ohio distributor only sells a small amount of this game and is now overstocked in it. I then buy it from him. The serial numbers are tracked to the Ohio distributor. The Ohio distributor bills me for the games listing the serial numbers. Those numbers can now be tracked to me. This is done to help both us and them keep inventory under control. As long as the game is approved and the serial numbers are tracked, everyone should be happy.

901.143. *Restrictions on distributorship interest.* The proposal reads as follows:

(b) A person who is an officer, director, proprietor, consultant, employee or owner of a distributorship may not have a pecuniary interest in the operation of games of chance. **For purposes of this section, a pecuniary interest is the actual or potential for an accession to wealth, whether cash or property, resulting from the play and operation of a game of chance. It includes an interest resulting from one of the following acts:**

(1) The sale of a game of chance in exchange for a contingent fee based upon a percentage of the proceeds from chances sold in or prizes awarded in the game.

(2) A lease of a dispensing machine in which the rental is based upon the number of games purchased by the eligible organization, the percentage of proceeds from chances sold or prizes awarded in games of chance.

Our concern: We have had employees who work bingo games because they belong to that church, but are not compensated based on either of these two methods. Some of our salespeople have been hired because we connected with them through the bingo halls. Are they restricted from being involved in their church's bingo?

901.445. *Records.*

(1) *Sales Invoices.* All products are delivered to our customers using consecutively pre-numbered delivery slips. Computer generated consecutively numbered invoices are then generated at our office from those slips. Does this meet the guidelines presented in this publication?

(vi) Hundreds of games are approved each month by the Commonwealth and we are not made aware of it. How would a distributor confirm that a game is approved?

1. Place a phone call to the Department of Revenue. How are they going to have time to go over every game with us that is approved? If a manufacturer sends a copy of the letter from the state, we could get hundreds of letters a month.
2. They could e-mail all 120 or so distributors each day the games that are approved.

The state of New York has a website that lists all approved games. I recommend that you check out their web site www.racing.state.us/charitable/char.home.htm and make that a consideration in Pennsylvania.

(vii) The proposal reads as follows: The quantity and sales price of each individual item, including individual items of merchandise to be used as prizes on punchboards and pull-tabs.

Our Concern: I have many concerns about this one. Here's an example of how it works now. We sell a board with tickets, a seal prize, and a number of smaller prizes to an organization. The number of smaller prizes may have an average value of \$20 for each prize, but each prize individually may be higher or lower than the \$20. So what does the term 'sale price' of the individual items mean? Does it mean the retail value we place on it or what we paid for it? These boards are also manufactured with prizes that we have in stock, so they rarely if ever, contain the same prizes on each board. Does each unique board have to be submitted to you for approval? If we switch out a knife set for a toaster, does the game have to be resubmitted? If we have a TV as a seal prize on one and a laptop computer as a seal prize on another, both with the same value, do they individually have to be submitted for approval? Or if the laptop on one is a Dell and on another is a Gateway, does that have to be specified and submitted separately? My next question on this subject is if we buy an iPod for \$300 and put it on a board for a \$500 seal prize, is the value \$300 or \$500? If we list each item, then you will be getting calls that we sold an iPod for \$500 and they could buy it for \$300. What happens then? Is the plan to tell us how much we can make on an item? If the customer doesn't think the iPod is worth \$500, they won't buy it. If I have 40 prizes and list each item at \$20, who is to say that I'm wrong? Also, think of the extra paperwork we all will have. A three line invoice will turn into a two or three page invoice. Please see our Attachment #1 for the way we currently submit a board and our Attachment #2 for the way you are proposing we do it. We've also included Attachment #3, which is the way our current invoices look and Attachment #4, which is how they would look if these changes are made.

901.601. Uniform minimum quality standards.

[(2)] (d) *Sub-deals.* We believe that if you have a better understanding of how sub-deals work, then you may consider allowing them. The law allows 4,000 tickets per deal of tickets. A sub-deal would be equally divided portions of that 4,000 with one master seal card. For example, there could be a sub-deal of 400 tickets per pack with 10 packs per deal equaling 4,000 tickets and each sub-deal has a seal card. Once the sub-deal (400 tickets) is sold, then the seal is opened and that winner gets to go to the master seal card to see how much they won. The prize could be \$25 to \$400 depending on what seal amount is opened. That winner would also sign the master board for a chance at \$500. I believe the issue that the Dept. of Revenue has is that when a person wins \$25, the percentage of payout is less than 65%. But when the person wins \$400, they pay out 100% of what was taken in on that sub-deal. Once all 10 sub-deals are

played, the total payout would be 65% or more, which is required by state law. The sub-deal would be no different if a worker pulled 400 tickets out of the 4,000 count deal and sold them and a winner only won \$25. The advantage for the hall and the player is the following:

1. The player thinks they have a better chance of winning if there are fewer tickets.
2. It's easier for the charity to sell tickets in smaller quantities and also be able to offer big money.
3. A player will buy \$10 worth of tickets from each sub-deal trying to get a holder from each sub-deal as opposed to not having a sub-deal where they may only buy \$20 or until they get a holder, then they stop. As long as the player understands how it's played, they like the sub-deals.

Just as the state lottery does, it is the charity's job to try to get the player to buy as many tickets as they can afford. Keep in mind that when all 10 deals are sold, the payout is the same amount as not having a sub-deal. The state of New Jersey has the same laws in place as Pennsylvania, with the exception of sub-deals, which they allow.

GENERAL MANUFACTURING STANDARDS

910.632 Predetermination of rules, winning chances and prizes.

(b) The proposal reads as follows: A registered manufacturer may not produce a pull-tab game or punchboard for sale or use in this Commonwealth that permits the operator of or a participant in the game to choose between optional games rules, payout structures or methods of operating the game.

Our Concern: The number of seal card games that have multiple seals is approximately 99%, normally with three options. If you change this rule, for every one game they make now, they would have to make three, which I'm sure they wouldn't do because it would not be cost effective. If a seal card had a \$500 payout, the options may be 1 @ \$500 or 5 @ \$100 or 20 @ \$25. (See our Attachment #5) In our market, 60% of the charities would use 5 @ \$100; 35% would use 1 @ \$500; and 5% would use 20 @ \$25. Using these percentages, the manufacturers would only make the 5 @ \$100 because they would not sell enough to make the other two options. Or if they did, the price would go up considerably because they would have to run small quantities. This higher cost would then be passed on to the charity. These charities are having trouble making ends meet now without adding unnecessary costs. In a bingo hall, usually the number of players is what determines the payout they use. I would estimate that 99.9% of the time, either the charity announces how they are paying out the game or a player will ask how it is being paid out as they purchase them. One other thing to consider is that these multi-seal cards are not made just for PA. The states that allow multi-seal cards would still want them. Under your proposed change, the manufacturer would have to make four different games: multi-seal option and the other three listed above. This again would increase manufacturing costs.

901.709. *One eligible organization and license per premises.*

(c) Does this limit the number of licenses that can play at a hall? Does the notification to the district attorney have to be prior to each game or at the organization's hall usage onset?

In closing, I would like to take a moment to go back to page 3 of the publication and address the areas of fiscal impact and paperwork. If these changes take place, there will be a lot more paperwork involved with everything from invoicing documentation changes to the multitude of games submitted for approval. Making any kind of change like this will continue to hurt the charities as did allowing casinos in PA. Our charities, (VFW's, Legions, fire companies, and churches) are down between 20% to 40% since the casinos started and the enforcement of the \$5,000 law. We have about 15% of our bingo halls shut down because they could not make any money. I am not opposed to the casinos, however, the charities do a lot of good work for our communities and this would just be another way of pushing them to close their doors. We have enough problems in PA without trying to put the charities out of business. The fire company in my area says that 50% of their income is from games of chance. Does the state have any idea how they can raise that money? It seems clear to me that these changes are being made to make it easier for Liquor Control Enforcement to do their job? I'm not against tracking the sales and money, but there are easier ways. This industry and the many charitable organizations associated with it should not have to suffer just because these bureaucrats wish to make their workload a little easier. These changes and their consequences can and will damage this industry greatly. I would strongly urge you to assemble a panel of advisors, including VFW and Legion Officers, bingo hall managers, and PA distributors and manufacturers to further evaluate these changes and their impact. We live in this industry, we know how it works, and we feel we have valuable insights to share with you.

I thank you for your consideration.

Sincerely,



Michael C. Philbin
President

Enclosures

CC: State Representative Garth Everett
State Representative Curt Schroder
State Representative Rick Mirabito
Senator Gene Yaw

PENNSYLVANIA SMALL GAMES OF CHANCE GAME APPROVAL FORM

MANUFACTURER INFORMATION

1 Name of Manufacturer: **KEYSTONE BINGO SUPPLY, INC.**
 2 License: **M0083**
 3 Contact Person: **MICHAEL PHILBIN**
 Phone: **570-546-3099** FAX: **570-546-3215**
 4 Address: **PO BOX 350, 1625 JOHN BRADY DR., MUNCY PA 17756**

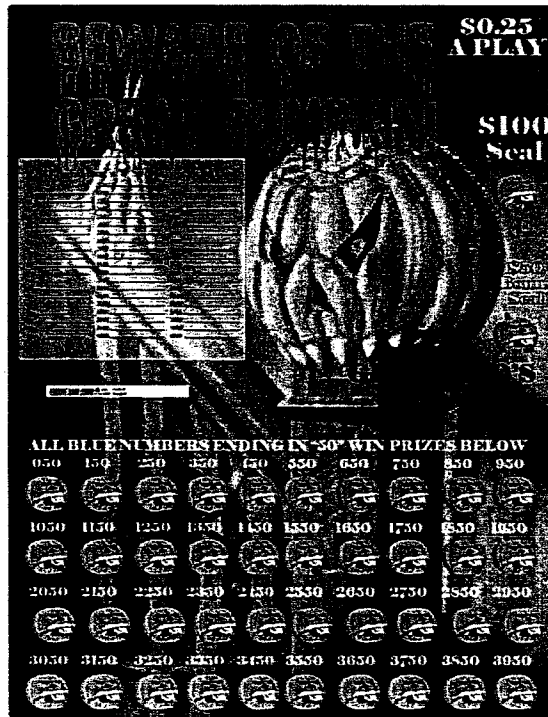
ATTACHMENT #1

NAME OF GAME: **BEWARE OF THE GREAT PUMPKIN!**
 FORM NUMBER: **90-3984BGP40P** TICKETS USE: **BONANZA PRESS 55633JJ2 3984count**
 DESCRIPTION OF GAME: **Merchandise Prize Board**
 RULES FOR PLAY: **Buy a ticket and look for winning numbers**

GAME PRIZE: **60 Red Numbers Sign-up for Cash Seals:1@\$100,1@\$50 (\$150 payout)**

STRUCTURE: **40 Blue Numbers win Prizes(40 prizes @\$12.375 Value) (\$495 Value)**
14 Green Numbers win \$5.00 each (\$70 payout)

NUMBER OF CHANCES: **3984 Tickets @\$0.25 per ticket (\$996 Total)**
 PAYOUT PERCENTAGE: **72%** MERCHANDISE VALUE: **\$495** TOTAL CASH PAYOUT: **\$220**
 COIN VALUE: **\$0** CLUB PROFIT: **\$281(28%)**



PENNSYLVANIA SMALL GAMES OF CHANCE GAME APPROVAL FORM

MANUFACTURER INFORMATION

ATTACHMENT #2

1 Name of Manufacturer: KEYSTONE BINGO SUPPLY, INC.
2 License: M0083
3 Contact Person: MICHAEL PHILBIN
Phone: 570-546-3099 FAX: 570-546-3215
4 Address: PO BOX 350, 1625 JOHN BRADY DR., MUNCY PA 17756

NAME OF GAME: BEWARE OF THE GREAT PUMPKIN!
FORM NUMBER: 90-4000BGP40P TICKETS USE: Muncy Novelty F1X03-14
DESCRIPTION OF GAME: Merchandise Prize Board 4000Bundles Pasted 3
RULES FOR PLAY: Buy a ticket and look for winning numbers

GAME PRIZE: 60 Red Numbers Sign-up for Cash Seals:1@\$100,1@\$50 (\$150 payout)

STRUCTURE: 40 Blue Numbers win Prizes (\$495 TOTAL VALUE)

ITEM	PRICE	QUANT
PBC PALMERS	\$3.90	1
SHIMMER LITES	\$13.20	1
PBC PALMERS	\$3.90	1
RESIN SHOE	\$9.35	1
GOOGLY EYES	\$3.75	1
JACK O LANT(XL)	\$16.65	1
GOOGLY EYES	\$3.75	1
JACK O LANT(MED)	\$ 9.85	1
FUN FAVORITES	\$3.55	1
SM GHOST	\$5.85	1
FUN FAVORITES	\$3.35	1
BOO STAKE	\$14.50	1
GHOST PEEPS	\$1.95	1
HAUNTED BIRD	\$26.35	1
GHOST PEEPS	\$1.95	1
MOVING SHINGLES	\$24.55	1
PUMPKIN PEEPS	\$1.95	1
SCARECROW MASK	\$18.25	1
PUMPKIN PEEPS	\$1.95	1
CARVING KIT	\$12.95	1
CANDY CORN	\$6.25	1
FLUTED GLASS	\$9.35	1
CANDY CORN	\$6.25	1
HORROR PC	\$16.65	1
TWISTED PUMPKINS	\$8.35	1
MASK	\$19.95	1
TWISTED PUMPKINS	\$8.35	1
60" EVIL PUMPKIN	\$49.95	1
COMBO BAG	\$19.35	1
ASST SPIDERS	\$12.45	1
COMBO BAG	\$19.35	1
STRING SPRAY	\$8.25	1

TRICK OR TREAT MIX	\$6.85	1
M/U HORROR LITE	\$14.65	1
TRICK OR TREAT MIX	\$6.85	1
AUTUMN TAFFY	\$5.75	1
FAKE BLODD	\$12.95	1
AUTUMN TAFFY	\$5.75	1
3' LAMP REAPER	\$47.65	1
STROBE LIGHTS	\$28.55	1

14 Green Numbers win \$5.00 each (\$70 payout)

NUMBER OF CHANCES:
PAYOUT PERCENTAGE:

4000 Bundles @\$0.25 per bundle(\$1000 Total)
71%
MERCHANDISE '\$495 TOTAL CASH PAYOUT: \$220
COIN VALUE: \$0 CLUB PROFIT: \$285 (29%)

BWARE OF THE GREAT PUMPKIN

\$0.25 A PLAY

\$100 Seal

\$50 Bonus Seal

ALL BLUE NUMBERS ENDING IN "50" WIN PRIZES BELOW

050	150	250	350	450	550	650	750	850	950
1050	1150	1250	1350	1450	1550	1650	1750	1850	1950
2050	2150	2250	2350	2450	2550	2650	2750	2850	2950
3050	3150	3250	3350	3450	3550	3650	3750	3850	3950



Keystone Bingo Supply

P.O. Box 350 -:- Muncy, PA 17756

800-598-5011 570-546-3099

Invoice

Page: 1

Invoice Number: 0164271-IN

Invoice Date: 9/21/2011

Customer No: 10-0001150

Salesperson: HOUSE

ATTACHMENT #3

PA D261
NY B&R 228
NJ B 212-11
NJ R 411-11

Sold To:

MISC
PA

Ship To:

MISC
PA

Control Slip #:	Ship Via	Exemption #:	Terms
			NET 30 DAYS

Shipped	Item #	Description	Price	Disc	Amount
1	90-4000BGP40P	BEWARE OF THE GREAT PUMPKIN MB .25/1@100 IG \$1000 NET \$285	495.00	N	495.00
1	93-F1X03-60 8782351	4000ct NUMERAL TICKET \$1	0.00	N	0.00

SERVICE CHARGE OF 2% WILL BE CHARGED ON ALL INVOICES OVER 30 DAYS. PLEASE NOTE TERMS ABOVE.

Any Games of Chance listed have been approved by the Commonwealth of PA Department of Revenue

Net Invoice:	495.00
Less Discount:	0.00
Freight:	0.00
Sales Tax:	29.70
Invoice Total:	\$524.70



Keystone Bingo Supply
P.O. Box 350 -- Muncy, PA 17756
800-598-5011 570-546-3099

Invoice

Invoice Number: 0164268-IN
Invoice Date: 9/21/2011
Customer No: 10-0001150
Salesperson: HOUSE

ATTACHMENT #4

PA D261
NY B&R 228
NJ B 212-11
NJ R 411-11

Sold To:
MISC
PA

Ship To:
MISC
PA

Control Slip #: Ship Via Exemption #: Terms
NET 30 DAYS

Shipped	Item #	Description	Price	Disc	Amount
1	90-4000BGP40P	BEWARE OF THE GREAT PUMPKIN MB .25/1@100 IG \$1000 NET \$285	0.00	N	0.00
1	93-F1X03-60 8782351	4000ct NUMERAL TICKET \$1	0.00	N	0.00
1	MISC SALE	PBC PALMERS	3.90	N	3.90
1	MISC SALE	SHIMMER LITES	13.20	N	13.20
1	MISC SALE	PEANUT BUTTER CANDIES	3.90	N	3.90
1	MISC SALE	RESIN SHOE	9.35	N	9.35
1	MISC SALE	GOOGLY EYES	3.75	N	3.75
1	MISC SALE	JACK O LANT (XL)	16.65	N	16.65
1	MISC SALE	SPOOKY EYES	3.75	N	3.75
1	MISC SALE	JACK O LANT (MED)	9.85	N	9.85
1	MISC SALE	FUN FAVORITES	3.55	N	3.55
1	MISC SALE	SM GHOST	5.85	N	5.85
1	MISC SALE	GUMMY CANDIES	3.35	N	3.35
1	MISC SALE	BOO STAKE	14.50	N	14.50
1	MISC SALE	GHOST PEEPS	1.95	N	1.95
1	MISC SALE	HAUNTED BIRD	26.35	N	26.35
1	MISC SALE	PUMPKIN PEEPS	1.95	N	1.95
1	MISC SALE	MOVING SHINGLES	24.55	N	24.55
1	MISC SALE	WITCH PEEPS	1.95	N	1.95
1	MISC SALE	SCARECROW MASK	18.25	N	18.25
1	MISC SALE	PUMPKIN CHEWIES	1.95	N	1.95
1	MISC SALE	CARVING KIT	12.95	N	12.95
1	MISC SALE	CANDY CORN	6.25	N	6.25
1	MISC SALE	FLUTED GLASS	9.35	N	9.35
1	MISC SALE	MAPLE CANDIES	6.25	N	6.25
1	MISC SALE	HORROR PC	16.65	N	16.65

Continued



Keystone Bingo Supply

P.O. Box 350 -- Muncy, PA 17756

800-598-5011 570-546-3099

Invoice

Invoice Number: 0164268-IN

Invoice Date: 9/21/2011

Customer No: 10-0001150

Salesperson: HOUSE

PA D261
NY B&R 228
NJ B 212-11
NJ R 411-11

Sold To:

MISC
PA

Ship To:

MISC
PA

Control Slip #: Ship Via Exemption #: Terms
NET 30 DAYS

Shipped	Item #	Description	Price	Disc	Amount
1	MISC SALE	TWISTED PUMPKINS	8.35	N	8.35
1	MISC SALE	MASK	19.95	N	19.95
1	MISC SALE	WITCH STAKE	8.35	N	8.35
1	MISC SALE	60" EVIL PUMPKIN	49.95	N	49.95
1	MISC SALE	COMBO BAG	19.35	N	19.35
1	MISC SALE	ASS'T SPIDERS	12.45	N	12.45
1	MISC SALE	BATS & SPIDERS	19.35	N	19.35
1	MISC SALE	STRING SPRAY	8.25	N	8.25
1	MISC SALE	TRICK OR TREAT MIX	6.85	N	6.85
1	MISC SALE	M/U HORROR	14.65	N	14.65
1	MISC SALE	TRICK BAG	6.85	N	6.85
1	MISC SALE	AUTUMN TAFFY	5.75	N	5.75
1	MISC SALE	FAKE BLOOD	12.95	N	12.95
1	MISC SALE	FALL LEAVES	5.75	N	5.75
1	MISC SALE	3' LAMP REAPER	47.65	N	47.65
1	MISC SALE	STROBE LIGHTS	28.55	N	28.55

SERVICE CHARGE OF 2% WILL BE CHARGED ON ALL INVOICES OVER 30 DAYS. PLEASE NOTE TERMS ABOVE.

Any Games of Chance listed have been approved by the Commonwealth of PA Department of Revenue

Net Invoice:	495.00
Less Discount:	0.00
Freight:	0.00
Sales Tax:	29.70
Invoice Total:	<u>524.70</u>



Keystone Bingo Supply

P.O. Box 350 -- Muncy, PA 17756
800-598-5011 570-546-3099

Invoice

Invoice Number: 0164271-IN
Invoice Date: 9/21/2011
Customer No: 10-0001150
Salesperson: HOUSE

PA D261
NY B&R 228
NJ B 212-11
NJ R 411-11

Sold To:
MISC
PA

Ship To:
MISC
PA

Control Slip #:	Ship Via	Exemption #:	Terms			
			NET 30 DAYS			
Shipped	Item #	Description	Price	Disc	Amount	
1	90-4000BGP40P	BEWARE OF THE GREAT PUMPKIN MB .25/1@100 IG \$1000 NET \$285	495.00	N	495.00	
1	93-F1X03-60 8782351	4000ct NUMERAL TICKET \$1	0.00	N	0.00	

SERVICE CHARGE OF 2% WILL BE CHARGED ON ALL
INVOICES OVER 30 DAYS. PLEASE NOTE TERMS ABOVE.

**Any Games of Chance listed have been approved by the
Commonwealth of PA Department of Revenue**

Net Invoice:	495.00
Less Discount:	0.00
Freight:	0.00
Sales Tax:	29.70
Invoice Total:	\$524.70

\$1 PER CHIP

Bowl Number

BONANZA

HOLD SYMBOLS 1-20 FOR A CHANCE TO WIN

WOOT LOOT

\$500 OR **\$100** OR **\$25**

OPEN 1 WINNER OPEN 5 WINNERS OPEN ALL HOLDERS WIN

Operator: Open only 1 window.



\$100 \$100 \$100 \$100

\$100 \$100 \$100 \$100

\$100 \$100 \$100 \$100

\$100 \$100 \$100 \$100

\$50 \$50 **\$10** **\$2**

\$50 \$50 12 WIN 285 WIN

SIGN UP

- 1 _____
- 2 _____
- 3 _____
- 4 _____
- 5 _____
- 6 _____
- 7 _____
- 8 _____
- 9 _____
- 10 _____
- 11 _____
- 12 _____
- 13 _____
- 14 _____
- 15 _____
- 16 _____
- 17 _____
- 18 _____
- 19 _____
- 20 _____

TICKET COUNT:
3955



Date In _____ Date Out _____

Signature _____

60302

© Claimed by Bonanza
Please send registration
numbers 1027652 and
2039784.

CERTIFIED MAIL



7006 0810 0002 2756 6633

KEYSTONE BINGO SUPPLY, INC
PO BOX 350
MUNCY, PA 17756



1005

17128

U.S. POSTAGE
PAID
MUNCY, PA
17756
SEP 23 11
AMOUNT

\$7.20

00062586-11

ATTN MARY R SPRUNK
OFFICE OF CHIEF COUNSEL
DEPT OF REVENUE
PO BOX 281061
HARRISBURG PA 17128-1061