

## Andrea Gyger

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**From:** John Rickman [REDACTED]  
**Sent:** Saturday, May 28, 2011 9:21 AM  
**To:** Andrea Gyger  
**Subject:** Comment on proposed rules

**Categories:** Rules

It appears that the last sentence in proposed rule 9.0(E)(5) – “A licensee shall not use any wheel containing 0 or 00 unless it offers to sell tickets for those segments, and a purchaser must win if he or she possesses a ticket bearing the numbers 0 or 00.” – is designed to exclude roulette wheels or to require that tickets with 0 and 00 are available if a roulette wheel is used. As written, the rule requires anyone holding a ticket with “0” or “00” be declared a winner, even if the pointer doesn’t land on 0 or 00. I suggest that the last sentence be replaced with “A roulette wheel <is> <is not> an acceptable device for a wheel raffle.” Use either “is” or “is not” to convey your specific intent. Whether there is a “0” or “00” is immaterial as numbers are not required; symbols are acceptable as long as the tickets match the options on the wheel.

**John Rickman**  
**HBA Cares, Inc.**  
[REDACTED]