

HB

640

SENATE AMENDMENT

By Senate Judiciary Committee

To: _____ SENATE BILL No. CSHB

To: _____ HOUSE BILL No. CSHB 640 (Jud)

PAGE:

LINE:

On line 9, Page 1, add the following section:

SEC. 05.15.210.(15) "Qualified organization" means a bona fide civic or service organization or a bona fide religious, charitable, fraternal, labor political, or educational organization, police or fire department company, dog mushers' association, or fishing-derby or TRADE association in the state, which operates without profit to its members and which has been in existence continually for a period of five years immediately before applying for a license, and the organization may be a firm, corporation, company, association or partnership:

On Line 12, Page 1, delete "and punchboard games"

COMMITTEE REPORT

SENATE

2/18/82

FURTHER: None

Date:

March 5, 1982

Mr. President:

The Committee on JUDICIARY has had CS HB 640 (Jud) pull-tab and punchboard games

under consideration and (a majority of the committee) (the committee) reports it back with the following recommendations:

- [] do pass [] do not pass
[X] do pass with attached amendments(s)
[] replace with CS for [] same title [] new title
and recommends
[] AND attaches a "Letter of Intent" [] New Fiscal Note
[] reports it back without recommendation
[] referred to the Committee

MEMBERS SIGNING DO PASS

Handwritten signatures of committee members under the 'DO PASS' heading.

MEMBERS HAVING OTHER RECOMMENDATIONS:

Blank lines for members with other recommendations.

CHAIRMAN

MOOSE Lodge 94B 646

WE the undersigned request that Governor Jay Hammond and/or Lt. Governor Terry Miller extend the deadline on Pull Tabs that has been set for December 31, 1981 by the Department of Revenue to April 1, 1982 to allow Legislative time to address the issue of Pull Tabs.

WE the undersigned thank you.

NAME	ADDRESS
Lair Smith Reynolds	200 Gaffney Fairbanks
Michael Curran B	200 Gaffney FAI
Robert P. Baker	917 Johnson Fbks
Anthony J. Dubosh	1109 6th FAIRBANKS
Marion Antonski	1109 6th Fbks Alaska
Douglas A. Widge	SRB060378A FBKS, AK
Colleen Dehart	3143 Davis Rd
Angela Widge	SRB060578-A Fbks 99701
Don Hammond	218-6th
Jack Murray	81342 COLLEGE, AK
Ed B. Smith	PIONNEERS HOME
Alfred D. Strong	1545 Eadsen St
Lawrence E. Smith	4226-8 549th St
Virginia Buswell	2131 4th Ave Fbks
Vilho Ylmi	1222 5th Fbks
Ed Ylmi	1222 5th Fbks
Lawrence Ylmi	950 Salmon apt B
Carl E. Meil	1012-5th Ave
Paul A. Cantamano	2248 Bridgeway
Stephen M. Thompson	SRBx50266 Fairbanks AK 99701
Don E. Bates	734 Northwood Bldg Fbks AK
Jack Dehart	3143 Davis Rd Fbks AK 99701
Mark J. Palmer	307 Minnie Fairbanks AK 99701
Linda Cooper	P.O. Box 1600 FBK 99707
Wendell C. Cooper	PO Box 1600 FBK AK 99707
Janet Stone Breaker	4210 #560 street Ft. Wainwright
Malcolm R. Brown	SR4B1 10214 Fbks Alaska
James	950 N. 2nd St. Fairbanks
James J. Hoyer	1831 Tamarack FBKS W/A
Billie J. Hoyer	1831 Tamarack FBKS W/A
Thomas J. Schmitt	653 8th Fairbanks AK
Edith J. Jordan	PO Box 72225 Fairbanks AK
Robert E. Moran	1009- Johnson Fair
J. E. Bringer	2085 LAKEVIEW TER. FBKS, AK.
H. D. Morris	1008 LAKEVIEW TR FBKS 99701

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WE the undersigned thank you.

NAME	ADDRESS
Jackie Miller	456-3609 315 11th #1
Karlene MacGedney	P.O. Box 73026 Fairbanks, Ak.
Allen M. Labrey	P.O. Box 73036 City
Steve [unclear]	3742 [unclear] FBKs
Debra [unclear]	100 College Rd #103 FBKs
[unclear]	413 Wedgwood #451
Peterson [unclear]	401 Hillside #20
Sandra [unclear]	P.O. Box 73026 451-6380
Alma J. Bringer	2085 Lakeview Terrace Fairbanks, Alaska 99701
Alan E. Simons	28 Wanda Dr. FBKs, AK 99707
Richard Ribera	321 Barrow FBKs AK 99701
Joan Pook	1235 Noble St FBKs AK 99701
Gina Roushcole	1110 Lakeview Terrace FBKs AK 99701
[unclear]	122 Gold Rush Estate, FBK 99701
Janet E. Dube	122 Goldrush Est. FBKs 99701
Lois Moran	1009 Lakeview Terrace Fairbanks
Norma Vincent	SR Box 61039-D FBKs, AK 99701
Richard Jennings	SR Box 61039-D FBKs, AK 99701
[unclear]	P.O. Box 379 FBK 99701
[unclear]	P.O. Box 121 - FBKs 99701
Alan [unclear]	1844 Lillian St. FBKs 99701
John [unclear]	104 B-7 #14 FBKs AK 99701
Frank [unclear]	SR 70422 99701
TIM P DOLAN	SR Box 90724 B FAIRBANKS
Delwin Johnson	SR 10595 FBK AK.
Thomas [unclear]	3841 Birch Lane FBKs 99701
Maghan [unclear]	2841 Birch Lane FBKs 99701
Kurt [unclear]	601 Bentley Dr. FBKs 99701
Arthur [unclear]	1507 9th Ave FBKs
Ronald [unclear]	1642 Tanagerack FBKs AK
Tom [unclear]	2113 Durkin St. FBKs, AK
[unclear]	1098 Lakeview Terrace
Charlotte Dahmer	
James A. Crabb	488 2580 P.O. Box 73156 Fairbanks

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WE the undersigned thank you.

NAME	ADDRESS
Clark Linn	#81342 COLLEGE, AK
Ken G. Stull	P.O. 73225 FAIRBANKS 99707
George E. Bucher	261 College Rd Fairbanks AK 99701
James Stull	P.O. 73225 FAIRBANKS 99707
Martin Claywood	501 Baranof Fairbanks 99701
Mary Crawford	501 Baranof Fairbanks AK
Margaret Jones	2001 Seward St Apt 107
Deborah Chaitin	F.B.K. - Fairbanks
Frances John	F.B.K. AK
Danny Hull	SR61040 FBK - AK 99701
Betty Schneider	SRBak40269 FBK - 4569239
Bonnie Evans	107 Hickory
Wesley J. Johnson	41 Pioneer Tr. Point
J. A. Johnson	" " "
Mary Segerson	1100 23rd FAIRBANKS
Lester Segerson	" "
Edna M. Boufford	500 3rd Ave. FBKS, 99701
Rhea Owensley	54 Gold Peak E. FBKS AK 99701
Wanda Caddy	4339-9th - FAIRBANKS - Alaska
Larry Abbott	4339-8th 7 FAIRBANKS AK.
Johanna De Long	222 State St. Fairbanks
Isabella McKinnon	1010 Cushman FBKS, AK. 99707
Mary L. Pearson	S.R. Box 61123 FBKS AK. 99701
Nelson G. Phillips	1073 Lakewood Fairbanks AK 99701
Tom Keltner	SR 30564-L FBKS AK 99701
Samuel H. May	1739 23 Ave FBKS
Ellen Swatton	6 1/2 Mi Badger
Patricia M. Audette	126 2nd Ave #6 FBKS
W. M. Bue	222 STATE ST FBKS AK
Long Keltner	SR. 30564-L Fairbanks 99701
Deborah A. Smith	FBK-1181- 99707-1181
Frank Dutton	P.O. Box 73031, FBKS AK 99707
Jim Fastelings	013 College Rd FBKS AK
Patricia Mindey	219 Charles FBKS AK

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WE the undersigned thank you.

NAME ADDRESS

Toussaint B. Brown	472 nd St Co., Ft. Wainwright, AK
Charles F. Borchert	40 Cofield Box 263 Ft. Wainwright AK
Ralph E. Allen	600 Fairbanks St AK Fairbanks
Doris Helton	P.O. Box 55014 North Pole AK
Robert Helton	Box 55014 N-Pole, AK
Miss Borchert	Bx 74205 FBKS. AK
Frank B. Anderson	Box 2613, FAIRBANKS, AK 99701
Michael W. Cox	SR 20091A Fairbanks AK 99701
Kenneth Stephens	4055 Wedgewood Fl A 99701
Dean P. Burrows	1651-2nd Ave Fbks. AK 99701
John P. Burrows	1651 2nd Ave Fbks AK 99701
Jack Manning	141 Dunkle FBKS
John Manning	141 Dunkle apt 6 Fbks.
Marie Babitskas	P.O. Box 74049 Fbks. 99707.
W. E. Leonard	2945 Mack Rd
Bill Godwin	121 Gold Bell Estates Fbks.
Ernie Carter	1208 Denali Fairbanks, Alaska.
Carol Hamilton	SR 31127 Fairbanks, Ak.
Quinn Seard	317thines ave apt 101.
Raymond Ingele	SR 60375 Fairbanks AK 99701
Charles Philal	AP# 55525 North Pole 99706
Deloise E. Stolen	P.O. Box 1048 - Fbks 99707
Ernie Stolen	
Mary Feldman	# 7 HARALST
John Balas	SR Box 20668
Much Balas	SR Box 20668
B. Connolly	504 th Stewart St
L. Jefferson	576 - Farewell Ct
W. Jefferson	576 - Farewell Ct
Leann Bowles	141 Nympha P.O. Box 73132
Harold Harold	141 Dunkle FBKS-99701
Larry Bowles	P.O. Box 73132 141 Dunkle - Fbks - 99707
LeRoy M. Morris	1008 Lakewood Terrace 99709
Norie Starkey	P.O. Box 74314

Pages 1037

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WE the undersigned thank you.

NAME	ADDRESS
Millard H. Young	1204-6th Fairbanks 99701
Tom Withland	Po Box 74412 99707
DeEtte Metz	1657 Second Ave #39 99701
Richard Rosbore	96 Trinidad Fairbanks AK 99701
Cynthia Schmidt	602 Stewart FBKS. AK 99701
Ronald E Rodriguez	141 2nd FBKS AK

AMENDMENT # 1

H.B. 640

SEC. 05.15.210. (15) "Qualified organization" means a bona fide civic or service organization or a bona fide religious, charitable, fraternal, labor political, or educational organization, police or fire department company, dog mushers' association, or fishing-derby or TRADE association in the state, which operates without profit to its members and which has been in existence continually for a period of five years immediately before applying for a license, and the organization may be a firm, corporation, company, association or partnership:

ALASKA BINGO SUPPLY

Division of GRIFFIN ENTERPRISES

3904 Arkansas Dr.
Anchorage, Alaska 99503

Est. 1966
(907) 243-7003

February 20, 1982

Alaska State Legislature
Pouch V
Juneau, Alaska 99811

Attn: Sen. Vic Fischer, Chairman
State Affairs Committee

Senator Fischer:

In reference to House Bill 640 (Pull-Tabs) now in your committee; I thought the enclosed petitions might show the widespread support for this issue. These petitions were circulated for about one week back in August when the State Dept. of Revenue suspended their use. Originally they were sent to various Dept. of Revenue officials, however, I felt you would like to know of their existence.

I have been in contact with many of the 400 or so organizations in Alaska that have utilized Pull-Tabs in the past and we sincerely hope your committee will vote favorably (and quickly) on this bill, and will do whatever is in your power to assist in its rapid passage.

As you know, Gov. Hammond has stated that he will probably veto this measure, therefore I would hope that your committee will get this measure to the floor for a vote as soon as possible to allow time to overcome Hammond's veto.

This issue has immense Statewide implications. Countless community projects will fall by the wayside unless other funding avenues are forthcoming. And I don't foresee the State of Alaska providing the funds to replace the income the Pull-Tabs created to these organizations.

If I can be of any assistance to help passage of this measure, please feel free to contact me.

Respectfully,


Mark Griffin

In reference to the State of Alaska letter dated 7/27/81 stating that "pull tabs" are not a raffle or lottery and their use will not be allowed after August 17, 1981; WE, THE UNDERSIGNED, BEING OVER THE AGE OF 19, protest this action. We believe "pull tabs" are a raffle or lottery and as such their use by authorized organizations is allowed. As members of our community, we also protest losing the benefits of countless community services and projects now being provided by authorized non-profit organizations through the income generated by the sale of "pull tabs".

NAME	MAILING ADDRESS	DATE
Edward J. Call	STAR R3 KENAI	8/18/81
Shirley Bird	Box 2045 Soldotna Alaska	8-18-81
Gay E. Shaw	Box 246 Soldotna Ak	8-18-81
Mickie Barber	Box 2137 Soldotna AK	8-18-81
Mary Lee McLean	Star Rt. 2 Box 165 Soldotna AK	8-18-81
Patsy L. Bird	Box 2045 Soldotna AK	8-18-81
Jim M. Ellis	Box 1055 Soldotna AK	8/18/81
Dean Yehrick	Box 162 Kenai, AK	9/16/81
Low McLean	Box 1078 Kenai, ak	99611 8/18/81
Steven D. All	Box 972 Soldotna, ak	99669 8/19/81
Julia Mann	Box 82 Kenai, ak	99611-0082
Jean H. Conroy	Box 2155 Soldotna, Ak	99669
William P. McCallister	Box 3293 Kenai, AK	99669
Helene Rust	Box 2011 Kenai, ak	99611
Ruby DiRaeve	Box 521 Soldotna AK	99669
Ruby Coulter	" " " "	" "
Marlene Spencer	P.O. Box 1713 " "	" "
James Spencer	" " " "	" "
Vanessa T. Wilson	" " " "	" "
Miriam Epperson	Box 368 Soldotna	
Richard L. Graham	Box 71 Kenai, ak	99611

Soldotna Lions

EARLY AS POSSIBLE BY 8/17/81!!

STATE DEPARTMENT OF REVENUE
STATE OFFICE BUILDING
POUCH SA
JUNEAU, ALASKA 99811

Please send copy to:
Alaska Ringo Supply
3904 Arkansas Dr.
Anch. Ak. 99503
243-7003

In reference to the State of Alaska letter dated 7/27/81 stating that "pull tabs" are not a raffle or lottery and their use will not be allowed after August 17, 1981; WE, THE UNDERSIGNED, BEING OVER THE AGE OF 19, protest this action. We believe "pull tabs" are a raffle or lottery and as such their use by authorized organizations is allowed. As members of our community, we also protest losing the benefits of countless community services and projects now being provided by authorized non-profit organizations through the income generated by the sale of "pull tabs".

NAME	MAILING ADDRESS	DATE
Edwina Herman	P.O. Box 970 Soldotna AK	8/19/81
Robyn Tuttle	PO Box 276 Nimitzville	8-19-81
Olga Berg	P.O. Box 271 Nimitzville	8-19-81
Natti Nelson	Box 411 Anward, Alaska	8-19-81
Anna A. Hisek	Box 3352 Sold.	8/19/81
Jan Pedersen	Box 214 Kenai	8/19/81
Wanda Tracy	Box 307 Seldotna	8-19-81
Janice Mattill	Box 14 Seldotna	8-19-81
Donna D. Doolittle	Box 180 Kenai	8-19-81
Marie L. Nims	Box 2451 Soldotna	8-19-81
Donna Doolittle	Box 3 Kenai	8-19-81
Donna Doolittle	Box 725 Kenai AK	8-22-81
Frank D. Doolittle	Box 370 Seldotna, AK	8-21-81
Gerald E. Collins	Box 254 Soldotna, AK	8-21-81
Stephen A. Mullins	Box 741 Soldotna, AK	8-21-81
Jan C. Mulline	P.O. 984 Kenai AK	8-21-81
Pauline Quinn	Box 443 Soldotna	8-21-81
J. Wilson	Box 2 Kenai	8/21/81
Mary Powers	Box 755 Soldotna, AK	8/21/81
Darwin Mortenson	Box 2346 Soldotna	8/21/81
Dan Mortenson	Box 2136 Soldotna	8/21/81
Dora A. Mortenson	Box 1857 Soldotna	8-21-81
June Willette	Rt 2, Box 329 Soldotna	8-21-81
Travis Chai	Box 329 Soldotna	8-21-81
Thelma E. Payne	Box 916 Kenai	8-21-81
Helen Turriage	Box 331 Soldotna	8-21-81

BY 8/17/81:

POUCH SA JUNEAU, ALASKA 99811

Alaska Bingo Supply 3904 Arkansas Dr. Anch. Ak. 99503 243-7003

In reference to the State of Alaska letter dated 7/27/81 stating that "pull tabs" are not a raffle or lottery and their use will not be allowed after August 17, 1981; WE, THE UNDERSIGNED, BEING OVER THE AGE OF 19, protest this action. We believe "pull tabs" are a raffle or lottery and as such their use by authorized organizations is allowed. As members of our community, we also protest losing the benefits of countless community services and projects now being provided by authorized non-profit organizations through the income generated by the sale of "pull tabs".

NAME	MAILING ADDRESS	DATE
Wes Dee Evans	2900 1/2 Eureka	
Mike Evans	2900 1/2 Eureka	
Donna Evans	7011 Altoona	
Dick Evans	7011 Altoona	
RANDY EVANS	7011 Altoona	
Russell Guy Evans	7011 Altoona	
Kathy D Lewis	2110 PAXSON #B.	
Ann Wushka	7800 Dr. Barr	
Kathy Vaughn	7800 Dr. Barr	
Joe Durrant	7800 Dr. Barr	
Donna Evans	905 mid ocean rd	
Gloria Breyer	1317 - O-ST	
Paula Young	9411 Rm. 101	
Kathleen J. Pick	21-391-B Cherry Hill Lane	
Jida Hamilton	921 W. 14 th	
Ernie Gundersen	621 17 th City	
Alan Davis	61-33 E. 7th th City	
Ann Blalock	511	
Sam Reed	21-444F City Ave	
Paulene Allen	21-759 E. Fig St	
Wm. H. Hunter	22914 Reliance	

MUST BE SUBMITTED TO: TOM WILLIAMS, COMMISSIONER
STATE DEPARTMENT OF REVENUE
STATE OFFICE BUILDING
POUCH SA
JUNEAU, ALASKA 99811

For Accountability
Please send copy to:
Alaska Bingo Supply
3904 Arkansas Dr.

In reference to State of Alaska, Dept. of Revenue letter (par. 9 dated 7/27/81) to all Games of Chance & Skill Permittees: "pull tabs" are not a raffle or lottery authorized by permit and will not be allowed after August 17, 1981. Failure to comply will result in revocation or suspension of said license.

WE, THE UNDERSIGNED, as members and patrons of _____, a non-profit organization with permit #81- _____ believe that "pull tabs" are a raffle or lottery and their use by authorized organizations is allowed. Pull tabs are a major source of income for our organization and discontinuation of this income will severely restrict our ability to contribute to community activities and continue our community responsibilities and obligations. We strongly protest this action and request the Commissioner of Revenue to review his opinion, and to consider the magnitude of the consequences if this action takes place.

NAME (Title)	MAILING ADDRESS	DATE
Edward Call VFW	Box 884 Soldotna AK	8-18-81
Shirley Reid	Box 2045 Soldotna Alaska	8-18-81
Joe E. Hays	Box 246 Soldotna Ak.	8-18-81
Wickie Barber	Box 2137 Soldotna AK	8-18-81
Mary Lois Milner	Star Ct. 2 Box 165 Soldotna AK	8-18-81
Robert F. Bird	Box 2045 Soldotna AK	8-18-81
Tom M. Gills	Route 1055 Soldotna AK	8/18/81
Carol Yehnick	Box 162 Soldotna, AK	8/19/81
Gene McEllen	Box 1078 Kenai, ak.	8-19-81
Yvonne Dues dell	Box 972 Soldotna, ak	8/19/81
Julia Mann	Box 82 Kenai ak	99411-0082
Jan H. Soren	Box 2188 Soldotna AK	99669
Debbie Rust	Box 2011 Kenai AK	99611
Theresa L. McCann	Box 3293 Kenai AK	99669
Ruby DeRube	Box 521 Soldotna AK	99669
Ruby Gault	" " " " " "	" " " "
Wanda Spence	PO Box 1713 " " " "	" " " "
Lynn Spence	" " " " " "	" " " "
William Epperson	Soldotna	99669
Victoria T. Wain	P.O. Box 408 Soldotna AK	99669

Soldotna Lions

Alaska Bingo Supply
 3904 Arkansas Dr.
 Anch, Ak. 99503
 243-7003
 BY 8/17/81:1
 JUNEAU, ALASKA 99811

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NAME (Title)	MAILING ADDRESS	DATE
Edwin Human	P.O. Box 970 Soldotna	8/19/81
Robyn Lister	PO Box 276 Nui. A.H.	8-19-81
Olga Berg	P.O. Box 276 Nui. A.H.	8-19-81
Hattie Nelson	Box 411 Seward Alaska	8-19-81
Frank Pedersen	Box 214 Kenai, Alaska	8-19-81
Blaise Lacy	Box 307 Soldotna	8-19-81
Ronald Pedersen	Box 1111 Kenai	8-19-81
Shirley L. Nance	Box 2451 Soldotna	8-19-81
Guinetta Cole	H. Pte 3 Kenai AK	8-19-81
Don Bula	Rte 2 Box 725 Kenai AK	8-22-81
Frank Bula	Rt #2 Box 389 Kenai AK	8-21-81
Gerald E. Collins	Box 254 Soldotna, AK	8-21-81
Stephen H. Phillips	Box 741 Soldotna, AK	8-21-81
Joe C. Meston	P.O. 984 Kenai AK	8-21-81
Christina Collins	Box 443 Soldotna	8-21-81
F. Wilson	Box 5 Kenai	8-21-81
J. Mcellette	Rt. 2 Box 229 Soldotna	8-21-81
Darwin Mortenson	PO Box 2346 Soldotna	8-21-81
Darwin Mortenson	Box 2136 Soldotna	8-21-81
Dorinda Mortenson	Box 1857 Soldotna	8-21-81
DANIEL FIEBELKORN	Box 3214 SOLDOTNA AK	8-21-81

POUCH SA JUNEAU, ALASKA 99811

BY 8/17/81

3904 ARKANSAS DR. ANCH. AK. 99503 / 245-7003

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NAME MAILING ADDRESS DATE

NAME	MAILING ADDRESS	DATE
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Alvin Bird	Box 2045 Soldotna AK	8-18-81
Elizabeth	Box 246 Soldotna AK	8-18-81
Michael J. Barlow	Box 2137 Soldotna AK	8-18-81
Mary Lou McLean	Star Rt. 2 Box 165 Soldotna AK	8-18-81
Patricia L. Bird	Box 2045 Soldotna AK	8-18-81
Sam M. Gallis	Box 1055 Soldotna AK	8/18/81
Dean Yonnick	Box 162 Kenai, AK	9/1/81
Low McLean	Box 1078 Kenai, AK	9/1/81
Steven J. Hill	Box 970 Soldotna AK	9/1/81
Julia Mann	Box 82 Kenai AK	99611-0082
Joan H. Conroy	Box 2188 Soldotna AK	99669
Theresa P. McCollin	Box 3293 Kenai AK	99669
Helen Rust	Box 2011 Kenai, AK	99611
Ruby DePalve	Box 521 Soldotna AK	99669
Ruby Coulter	" " " "	" "
Adriana Spence	PO Box 1713 " "	" "
James Spence	" " " "	" "
Virginia T. Wilson	" " " "	" "
William E. Spence	Box 368 Soldotna	
Richard L. Graham	Box 71 Kenai, AK	99611

EARLY AS POSSIBLE BY 8/17/81!!

MAIL TO: TOM WILLIAMS, COMMISSIONER (465-2300) STATE DEPARTMENT OF REVENUE STATE OFFICE BUILDING POUCH SA JUNEAU, ALASKA 99811

For Accountability Please send copy to: Alaska Bingo Supply 3904 Arkansas Dr. Anch. AK. 99503 243-7003

In reference to State of Alaska, Dept. of Revenue letter (par. 9 dated 7/27/81) to all Games of Chance & Skill Permittees: "pull tabs" are not a raffle or lottery authorized by permit and will not be allowed after August 17, 1981. Failure to comply will result in revocation or suspension of said license.

WE, THE UNDERSIGNED, as members and patrons of THE ALASKAN LOTTERY, a non-profit organization with permit #81-115 believe that "pull tabs" are a raffle or lottery and their use by unauthorized organizations is allowed. Pull tabs are a major source of income for our organization and discontinuation of this income will severely restrict our ability to contribute to community activities and continue our community responsibilities and obligations. We strongly protest this action and request the Commissioner of Revenue to review his opinion, and to consider the magnitude of the consequences if this action takes place.

NAME (Title)	MAILING ADDRESS	DATE
F. P. McLean	7041 E. 11 th Ave Anchorage, AK 99403	8/15/81
Maria Malone	1678 S. Lidar Dr. Anchorage AK	8/15/81
Daniel P. Haulage	SRA 1507 Anchorage Alaska	8/15/81
Kathy E. Stevens	SRA 1507-F ANCHORAGE ALASKA	8/15/81
Gene Davis	2205 Ken. Fair. Sp. Anchorage	8/15/81
Ed Wofford	5301 W 31 st Ave Anchorage AK	
Rose Marie Price	3301 W 31 st Ave Anchorage AK	
William F. Smith	SRA Box 427 Anchorage AK	
Eugene D. Macz	3177 Rogerson Rd Anchorage AK 99502	
Don Rieck	PO Box 10-803 Anchorage 99501	
Seaman J. Jones	Box 111 Anchorage AK 99501	
Helen D. Stewart	Box 281 Anchorage AK 99501	
David H. Sillaway	905 Commodore St Anchorage AK 99502	
Bryce B. [unclear]	Rt 1 Box 955A Ketchikan	
Joseph K. Craig	2323 1st Ave Ketchikan	
Tracy E. [unclear]	1611 White St Ketchikan	
John Craig	Rt 2 Box 575 Ketchikan	
Don Dandura	501 Airport Rd Anchorage AK	
Leslie Spurling	1100 F Deering Rd Anchorage AK 99502	
Robert A. Munniger	PO Box 208, Metlakatla AK 99588	
Ernie J. [unclear]	6133 Quinagak St. Anchorage AK	8-15-81

MAIL TO: TOM WILLIAMS, COMMISSIONER (465-2300)
STATE DEPARTMENT OF REVENUE
STATE OFFICE BUILDING
POUCH SA
JUNEAU, ALASKA 99811

EARLY AS POSSIBLE
BY 8/17/81!!

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3904 Arkansas Drive
Anchorage, Alaska 99503
243-7003

In reference to the State of Alaska letter dated 7/27/81 stating that "pull tabs" are not a raffle or lottery and their use will not be allowed after August 17, 1981; WE, THE UNDERSIGNED, BEING OVER THE AGE OF 19, protest this action. We believe "pull tabs" are a raffle or lottery and as such their use by authorized organizations is allowed. As members of our community, we also protest losing the benefits of countless community services and projects now being provided by authorized non-profit organizations through the income generated by the sale of "pull tabs".

NAME	MAILING ADDRESS	DATE
ALBERTA (MAY) BIRD	1300 1st Ave. Ketchikan	8-12-81
Harriet & Sidney	130 Bryant St	8/12/81
Ervin Mearns	3168 Tongass St. UH	8/12/81
AL PARMENTER	1754 1st Ave. Ketchikan	
Spike Fisher	PO BOX KTN, KTN, AK	8-12-81
Virginia Allen		8/12/81
Ronney Allen		8/12/81
Norma Brandt		8/12/81
Lillian Williams		8/12/81
Naomi McMichael	PO Box 591255	8/12/81
Bruce W. Guthrie Jr.	Box 125 Mot Alaska	8/2/81
Clara J. Milne	Box 52	7355 AD 8-12-81
Pete Milne	Box 52	Mot. Alaska 8-12-81
Neil Steff	245 Toaler Rd.	12-Aug 81
Loretta Zinner	" "	" "
Pauline & Willem	Box 6425	12/24/81
Bill Waring	3842 AL. AVE	8/12/81
Tom Teichman	531 Grant St	8/14/81
Constance M. Fertig	PO Box 1179 Urdi Cove	8/14/81
Angela & Fred	P.O. Box 1179 Urdi Cove	8/14/81
Alfred & Rose Watson	Box 6036 KTN	8-14-81
James R. Tom	P.O. Box 7072 KTN	8-14-81
Harvey Leach	P.O. Box 5123 "	8-14-81
Harold R. Baker	P.O. Box 5122 "	8-14-81
Jersey Baker	P.O. Box 8622 Ketchikan	8-14-81
Margaret Erickson	Rt 1 Box 764 Ketchikan	8-14-81

KETCHIKAN U.F.W.

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EARLY AS POSSIBLE
BY 8/17/81

KEEP THE PULL TAB PETITION

In reference to the State of Alaska letter dated 7/27/81 stating that "pull tabs" are not a raffle or lottery and their use will not be allowed after August 17, 1981; WE, THE UNDERSIGNED, BEING OVER THE AGE OF 19, protest this action. We believe "pull tabs" are a raffle or lottery and as such their use by authorized organizations is allowed. As members of our community, we also protest losing the benefits of countless community services and projects now being provided by authorized non-profit organizations through the income generated by the sale of "pull tabs".

NAME	MAILING ADDRESS	DATE
Archie A. Humphrey	RT-1-Box 1527	8-14-81
Julia Humphrey	Rt. 1 Box 1527	8-14-81
Patty Williams	Box 3143	8-14-81
Mary Dempsey	P.O. Box 6735	8-14-81
Edwin Williams	P.O. Box 3143	8-14-81
William Herbert	P.O. Box 6871	8-14-81
Kate C. Sinton	P.O. Box 6735	8-14-81
Robert E. Winton	2114 Fairway	8-14-81
Lo Crissa Trapp	Box 1182 Wainwright	8-14-81
Gene Jimmy	P.O. Box 7813	8-14-81
Joe Jimmy	P.O. Box 7813	
Ernest Williams	P.O. Box 6735	8-14-81
John O'Lantern	1026 Water Apt F	8-14-81
Chas. P. Cook	Box 87511	8-15-81
Ted J. Fricke	Box 8684	8-15-81
William Herbert	Box 668 WARD COVE	8-14-81

BY 8/17/81

JUNEAU, ALASKA 99611

JOHN H. HAMBURG JR.
Anch. Ak. 99503 /
245-7003

KEEP THE PULL TAB PETITION

In reference to the State of Alaska letter dated 7/27/81 stating that "pull tabs" are not a raffle or lottery and their use will not be allowed after August 17, 1981; WE, THE UNDERSIGNED, BEING OVER THE AGE OF 19, protest this action. We believe "pull tabs" are a raffle or lottery and as such their use by authorized organizations is allowed. As members of our community, we also protest losing the benefits of countless community services and projects now being provided by authorized non-profit organizations through the income generated by the sale of "pull tabs".

NAME	MAILING ADDRESS	DATE
Muriel George	Box 6235 KTKN	8-12-81
Lydia Mienar	4168 Tongass Ket	8-12-81
Erwin Mienar	4168 Tongass Ket	8-12-81
Edwin M. Johnson	777 Harris Lwr Ket	8-12-81
Ernie Dickson	741 Diemont Ket.	8-12-81
Carol Graham	Box 6193 KTKN	8-12-81
[unclear]	612 Hillside	8-12-81
Angie Neagus	Box 3131 KTKN	8-12-81
Debra K. [unclear]	183 Grant Ketchikan	8-12-81
Wesley Smith	Box 5923 Ketchikan	8-12-81
Ann Young	P.O. Box 7114 Ketchikan	8/12/81
Betty J. [unclear]	P.O. Box 5223 Ketchikan	8-12-81
Mabel [unclear]	Box 3788 Ketchikan	8-12-81
Bessie [unclear]	Box 600K KTKN	8-12-81
Delores [unclear]	Box 27 Ketchikan	8-12-81
Geri [unclear]	Box 7444 Ketchikan	8-12-81
Phyllis Morris	312 Beaumont KTKN AK	8-12-81
Vera Washington	Craig Alaska Box 157	8-12-81
Alvin [unclear]	P.O. Box 3133 KTKN AK	8-12-81
Elizabeth [unclear]	Box 8002	11-12-81
Bob [unclear]	Box 185	8-12-81
Maudie [unclear]	Box 5086	8-12-81
Boyle [unclear]	Box 8664 Ketchikan	8-12-81
J. [unclear]	Box 773	8-12-81
Oliver [unclear]	4142 Tongass KTKN	8-12-81
Joseph [unclear]	354 [unclear] KTKN	8-12-81

BY 8/17/81

POUCH SA JUREAU, ALASKA 99611

ALASKA BUREAU SUPPLY 3904 Arkansas Dr. Anch. Ak. 99505 243-7005

In reference to State of Alaska, Dept. of Revenue letter (par. 9 dated 7/27/81) to all Games of Chance & Skill Permittees: "pull tabs" are not a raffle or lottery authorized by permit and will not be allowed after August 17, 1981. Failure to comply will result in revocation or suspension of said license.

WE, THE UNDERSIGNED, as members and patrons of _____, a non-profit organization with permit #81- _____ believe that "pull tabs" are a raffle or lottery and their use by authorized organizations is allowed. Pull tabs are a major source of income for our organization and discontinuation of this income will severely restrict our ability to contribute to community activities and continue our community responsibilities and obligations. We strongly test this action and request the Commissioner of Revenue to review his opinion, and to consider the magnitude of the consequences if this action takes place.

NAME (Title)	MAILING ADDRESS	DATE
Esther Weiner	3842 Alaska Ave Ketchikan, AK	8-12-81
Ursula Edvardson	812 777 07220	8-12-81
Lynna Turner	3817- Baranof Ave Kot.	8-12-81
Step J. J. J.	Box 5155	8-12-81
Robert E. (Cole)	P.O. Box 2071	8-12-81
Malvin P. Burdick	P.O. Box 1094 WARD COVE AK	8-12-81
Dorely E. Burdick	P.O. Box 1094 WARD COVE AK	8-12-81
Ma	Box 5153	8-12-81
Jackie Smith	2535 2nd	8-12-81
Robert Grant	P.O. Box 8654 KETCHIKAN	8-12-81
John P. J. J.	Box 7323 Ketchikan	8-12-81
C. C. L. Bannister	1056 Woodman Ave Kot. AK	8-12-81
Bessie Dickson	741 Deering St Ketchikan AK	8-12-81
Ernie Nelson	8421 Ketchikan Alaska	8-12-81
Belle Richards	Box 6504 Ketchikan Alaska	8-12-81
James W. Wainwright	100 Main St Kot. AK	99901
Lorraine Richards	Box 6504 Ketchikan AK	99901
Mary Wright	1780 2nd Apt #5 Ketchikan AK	99901
Diana Padden	Box 7892 / 373 B. India Ketchikan AK	99901-2892
Marshall S. Denny	11 11 11 11 11 11 11 11	11 11 11
M. J. J. J.	1056 Woodman Ave Kot. AK	99901

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 BY 8/17/81 POUCH SA
 JUNEAU, ALASKA 99C11
 Alaska Ringo Supply
 3904 Arkansas Dr.
 Anch. Ak. 99503
 243-7005

In reference to State of Alaska, Dept. of Revenue letter (par. 9 dated 7/27/81) to all Games of Chance & Skill Permittees: "pull tabs" are not a raffle or lottery authorized by permit and will not be allowed after August 17, 1981. Failure to comply will result in revocation or suspension of said license.

WE, THE UNDERSIGNED, as members and patrons of _____, a non-profit organization with permit #81- believe that "pull tabs" are a raffle or lottery and their use by authorized organizations is allowed. Pull tabs are a major source of income for our organization and discontinuation of this income will severely restrict our ability to contribute to community activities and continue our community responsibilities and obligations. We strongly protest this action and request the Commissioner of Revenue to review his opinion, and to consider the magnitude of the consequences if this action takes place.

NAME (Title)	MAILING ADDRESS	DATE
Walter ...	PO of 522, 3	8/12/81
Ann Young	PO Box 7114	8/12/81
Betty ...	PO Box 5223	8/12/81
...	PO Box 5700	...
Delora ...	PO Box ...	8-12-81
H.	8-12-81
Phillip	8-12-81
...	PO Box #112	8-12-81
...	PO Box 3133 Kenai AK	8-12-81
...	PO Box 5752 Kenai	8-12-81
...	Box 8762	11 9990 8-12-81
...	Box 185	Met
...	Box 5286	Kenai AK
...	...	Kenai AK
...	Box 7755	...
...	421 Dake	...
...	421 Dake	...
...	...	925-6447 8-12-81
...	Box 547	Metlakatla

5904 ALASKA SUPPLY
 5904 ALASKA SUPPLY
 Anch. Ak. 99503
 245-7005

In reference to State of Alaska, Dept. of Revenue letter (par. 9 dated 7/27/81) to all Games of Chance & Skill Permittees: "pull tabs" are not a raffle or lottery authorized by permit and will not be allowed after August 17, 1981. Failure to comply will result in revocation or suspension of said license.

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NAME (Title)	MAILING ADDRESS	DATE
Max Smith	Box 8184	8-12-81
Mary L. Donald	130 Bryant St	8-12-81
Lucy P. Jones	2829 Tongass	8-12-81
Margaret Kato	119 Auburn St, 208	8-12-81
Robert Lee	Box 7154 - Ketchikan	8-12-81
Shelma Whitehead	Rt 1, Box 105 Ketchikan	8-12-81
Katherine Ziegler	623 Bryant St. Ketchikan	8-12-81
Joan Murphy	Box 7133	8-12-81
Pat Williams	Box 6652	8-12-81
Jana Jensen	3817 - Barron Ave.	8-12-81
Phil Jensen	3817 - Barron Ave.	8-12-81
Wanda Erickson	812 Morris Ketchikan	8-12-81
Fran Murphy	3729 TONGASS	8-12-81
Leffie Spear	882 Barron 77116	8/12/81
Carrie Shilton	818 Hill Street	8-12-81
Emeline Boyd	Box 7564 Ketchikan, Ak	8/12/81
William DeLorenzo	Box 5921	8/12/81
G. B. ...	Box 6576 Ketchikan	8-12-81
William O. Baul	Box 6576 Ketchikan	8-12-81
A. ...	Box 5530	8-12-81
L. ...	112 Hill Street	8/12/81

Alaska Bingo Supply
 5904 Arkansas Dr.
 Anch. Ak. 99505
 243-7005
 BY 8/17/81
 TOUCH SA
 JUNEAU, ALASKA 99811

In reference to the State of Alaska letter dated 7/27/81 stating that "pull tabs" are not a raffle or lottery and their use will not be allowed after August 17, 1981; WE, THE UNDERSIGNED, BEING OVER THE AGE OF 19, protest this action. We believe "pull tabs" are a raffle or lottery and as such their use by authorized organizations is allowed. As members of our community, we also protest losing the benefits of countless community services and projects now being provided by authorized non-profit organizations through the income generated by the sale of "pull tabs".

NAME	MAILING ADDRESS	DATE
No Lauth	Box 8184	8-12-81
Maree Dunkas	130 Bryant St -	8-12-81
Evelyn Edenas	2829 Longass -	8-12-81
Margaret Katz	119 Anatin # 1208	8/12/81
Leodika Succi	P.O. Box 7154 Ketchikan	8/12/81
Helene Whitender	Rt 1 Box 105 Ketchikan	8/12/81
Katherine Ziegler	623 Grant St. Ketchikan	8/12/81
Karen Murphy	Box 7633	8/12/81
Pat Williams	Box 6652 Ketchikan	8-12-81
Luna Ferrer	3817 - Baranof Ave.	8-12-81
Phil Ferrer	3817 - Baranof Ave.	8-12-81
Verina Edmondson	812 Monroe Ketchikan	8-12-81
Lisa Murphy	2729 TONGASS	8-12-81
Cathy Simpson	832 Buren #116	8/12-81
Donna Shelton	818 Harding St	8-12-81
Evelyn Loyd	Box 7364 Ketchikan	8/12/81
Lois Bergman	Rt 1 - Box 393 Ketchikan	8/12/81
L. Bergman	320 Bunker St Ketchikan	8/12/81
Linda Bergman	1314 Bunker St	8/12/81
Yvonne Toppenberg	30 + 343 WARD	8-12-81
Eugene Thompson	30 + 343 WARD	8-12-81
Elizabeth Thompson	861 Jackson Ketchikan	8-12-81
Patricia Thompson	Box 5921	8-12-81
Sandra Dyer	Box 6576 Ketchikan	8-12-81
Winnifred Dyer	Box 6576 Ketchikan	8-12-81
Pat Dyer	Box 5574	8-12-81

STATE OFFICE BUILDING
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JUREAU, ALASKA 99 111

Alaska Bingo Supply
3904 Arkansas Dr.
Anch. Ak. 99503
243-7003

BY 6/17/81

Name	Mailing Address	Date
Peacocke J. H. D.	Box 530	8-12-81
Charmaine Lukemell	421 Doka	8-12-81
Trace White	421 Doka	8-12-81
Kathy Johnson	4168 ...	8-12-81
Bert ...	4060 ...	8-12-81
Ed ...	Box 777	8-12-81
Wanda Kallonen	Box 7944	8-12-81
KATY SIIPINEN	Box 7583	8-12-81
Shirley Kallonen	" "	8-12-81
Diane Schaub	Box 5223	8-12-81
Kay ...		
...	Box 5153	8-12-81
Trinidad ...	Box 8583	8-12-81
Evelyn ...	249 ...	8-12-81
Sue Bass	Evergreen Tr. Hill	8-12-81
Don ...		
Miller L. Hoff	526 Deermount	8-13-81
	526 Deermount	8-13-81

In response to State of Alaska, Dept. of Revenue letter (part dated 7/27/81) to all Games of Chance & Skill Permittees: "pull tabs" are not a raffle or lottery authorized by permit and will not be allowed after August 17, 1981. Failure to comply will result in revocation or suspension of said license.

WE, THE UNDERSIGNED, as members and patrons of Palmer Moose Lodge #79, a non-profit organization with permit #81-3 believe that "pull tabs" are a raffle or lottery and their use by authorized organizations is allowed. Pull tabs are a major source of income for our organization and discontinuation of this income will severely restrict our ability to contribute to community activities and continue our community responsibilities and obligations. We strongly protest this action and request the Commissioner of Revenue to review his opinion, and to consider the magnitude of the consequences if this action takes place.

N/MB (Title)	MAILING ADDRESS	DATE
Richard E. Vogt ^{Trustee}	Box 1285 Palmer AK	8-11-81
Terry Clark Member	Box 1441 Wasilla AK	8-11-81
Paul C. Purcell Treasurer	Box 2514 Palmer AK	8-11-81
James Wilson Gov	Box 1406 Palmer	8-11-81
Paul J. Conner Member	Box 1146 PALMER	8-11-81
Wade T. Wilson MEMBER	SRR Box 7571 PALMER	8-11-81
James C. Smith	Box 101 Palmer	8-11-81
James McChesney Trustee	Box 357 Palmer	8-11-81
W. H. H. Member	Box 2996 Palmer	8-11-81
Robert A. Rubin Jr. Gov	Box 745 Palmer	8-11-81
James K. Mitchell	P.O. Box 1412 Palmer	8-11-81
J. E. Brainerd SOA	2085 LAKEVIEW FAIRBANKS, AK	8/11/81
Don Albritton MEMBER	SRR-7462 PALMER AK	8-11-81
Leo J. Lucas MEMBER	P.O. Box 855 PALMER, AK	8-12-81
L. W. Ostrom Member	P.O. Box 2925 PALMER, AK	8-12-81
Galt Bailey Member	SRA Box 6820 PALMER, AK	8-12-81
John H. Bradford Member	P.O. Box 2903 PALMER West Sub div	8-12-81
William R. Hagan Member	P.O. Box 944 PALMER, AK	8/12/81
David Parks Member	P.O. Box 1712 Palmer AK	8/12/81
Clifford W. Marcus Member	P.O. Box 115 PALMER, AK	8/12/81
John J. Hansen Member	Box 806 Palmer	8/12/81

STATE DEPARTMENT OF REVENUE
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JUNEAU, ALASKA 99801

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BY 8/17/81

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3904 Arkansas Dr.
Anch. AK 99503
245-7005

In reference to State of Alaska, Dept. of Revenue letter (par. dated 7/27/81) to all Games of Chance & Skill Permittees: "pull tabs" are not a raffle or lottery authorized by permit and will not be allowed after August 17, 1981. Failure to comply will result in revocation or suspension of said license.

WE, THE UNDERSIGNED, as members and patrons of Palmer Moose Club, a non-profit organization with permit, believe that "pull tabs" are a raffle or lottery and their use by authorized organizations is allowed. Pull tabs are a major source of income for our organization and discontinuation of this income will severely restrict our ability to contribute to community activities and continue our community responsibilities and obligations. We protest this action and request the Commissioner of Revenue to reverse his opinion, and to consider the magnitude of the consequences if this action takes place.

NAME (Title)	MAILING ADDRESS	DATE
Robert C. Moore, Secretary	P.O. Box 198 Palmer, Ak.	8-11-81
John A. [unclear] member	P.O. Box 235 Palmer, Ak.	8-11-81
Edward Stalme, member	Box 17-402 Big Lake AK	8-11-81
Harry M. Campbell, Jr. Member	Box 417 - Palmer, Ak.	8-11-81
Blaine E. Turing Member	Box 17300 Big Lake AK 99687	8-11-81
M. J. Chisk member	S.R. D. Box 9290 Palmer AK	8-11-81
Daniel J. [unclear] member	P.O. Box 742 Palmer AK	8-11-81
Ed R. Mookiet member	Box 640 Palmer Ak.	8-11-81
Jack M. [unclear] member	Box 1141 Palmer Ak.	8-11-81
William T. Hayes Member	Box 831 Palmer, Alaska	9-9-81
Harold [unclear] member	Box 796 Palmer	8-11-81
J. [unclear] member	Box 479 Palmer	8-11-81
Robert [unclear] member	Box 1215 Palmer	9-9-81
Ed [unclear] member	Box 62 Palmer	9-9-81
Paul R. [unclear] Member	Box 1692 Palmer	9-9-81
Alvin D. [unclear] member	Box 100 Palmer	9-9-81
Alvin O. [unclear] member	Box 470 Palmer	9-9-81
Robert E. [unclear] Member	P.O. Box 1674 Palmer	9-9-81
Raymond [unclear] Member	S.R. D. Box 9755 Palmer AK	9-9-81
Thelma M. [unclear] Member	Box 1926 Palmer, AK	8-11-81

NOT BE SUBMITTED FOR TON WALLIANS, COMMISSIONER
 STATE DEPARTMENT OF REVENUE
 STATE OFFICE BUILDING
 TOUCHER BL.
 JUNEAU, ALASKA 99811
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 BY 8/17/81
 Alaska Bingo Supply
 3904 Adairway Dr.
 Anch., Ak. 99503
 263-7003

reference to State of Alaska, Dept. of Revenue letter (par. 9 dated 7/27/81) to all Games of Chance & Skill Permittees: "pull tabs" are not a raffle or lottery authorized by permit and will not be allowed after August 17, 1981. Failure to comply will result in revocation or suspension of said license.

WE, THE UNDERSIGNED, as members and patrons of Palmer Moose Lodge #793, a non-profit organization with permit 181-324 believe that "pull tabs" are a raffle or lottery and their use by authorized organizations is allowed. Pull tabs are a major source of income for our organization and discontinuation of this income will severely restrict our ability to contribute to community activities and continue our community responsibilities and obligations. We strongly protest this action and request the Commissioner of Revenue to review his opinion, and to consider the magnitude of the consequences if this action takes place.

NAME (Title)	MAILING ADDRESS	DATE
J. H. Polster member	Box 17097 WASILLA AK	8-12-81
David G. Mulla (Member)	P.O. Box 533 Palmer Ak.	8-12-81
DAN ALCARIDA (MEMBER)	P.O. Box 1487 PALMER AK	8-12-81
David Badger (member)	P.O. Box 388 PALMER AK	8-12-81
Raymond Miller (MEMBER)	Box 2723 PALMER AK 99645	
Michael Wayne Kireil (Member)	P.O. Box 2072 PALMER AK 99645	
Ed Whinn	Box 1782 PALMER AK 99645	
Joseph A. Rollin (Member)	RTPA Box 6451 Palmer	
Ray J. Dine	P.O. Box 3368 PALMER	8-12-81
Frank Lavinia (Member)	Box 452 Palmer Alaska	8-13-81
Ray M. Cartney	Box 693 Palmer Alaska	8/13/81
Charles A. Safford	Star Route B, Box 7486 PALMER, AK	8-14-81
Steve (Safford) Safford	Box 702 Palmer	8/13/81
Robert D. Bush (Member)	Box 4-2964 ANCH. AK	8/14/81
Wm. D. Kemp (MEMBER)	Box 131 Palmer Alaska	8/14/81
J. O. Leish member	Box 711 Palmer	8-14-81
Errol D. Hamann, member	Rt C Box 8086 Palmer	8/14/81
Charles R. North, member	Box 212 Palmer	8/14/81
Quirick L. Math member	Box 6930 Palmer	8/15/81
Lloyd R. Plimley (Past Governor)	Box 1249 Palmer	8-15-81

STATE DEPARTMENT OF REVENUE
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 JUNEAU, ALASKA 99801
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 3904 Arkansas Dr.
 Anch. Ak. 99503
 243-7003

are not a raffle or lottery authorized by permit and will not be allowed after August 17, 1981. Failure to comply will result in revocation or suspension of said license.

WE, THE UNDERSIGNED, as members and patrons of Palmer Moose Lodge #78, a non-profit organization with permit #81-181- believe that "pull tabs" are a raffle or lottery and their use by authorized organizations is allowed. Pull tabs are a major source of income for our organization and discontinuation of this income will severely restrict our ability to contribute to community activities and continue our community responsibilities and obligations. We strongly protest this action and request the Commissioner of Revenue to review his opinion, and to consider the magnitude of the consequences if this action takes place.

NAME (Title)	MAILING ADDRESS	DATE
<u>P. J. Patrick (Member)</u>	<u>Box 626 Alaska</u>	<u>8/15/81</u>
<u>James D. Johnson (Member)</u>	<u>Box 1383 Palmer Alaska</u>	<u>8/15/81</u>
<u>Wesley Shugler (Member)</u>	<u>Box 37 Palmer Alaska</u>	<u>8/15/81</u>
<u>Wesley Shugler (Member)</u>	<u>Box 2915 Palmer Alaska</u>	<u>8/15/81</u>

STATE DEPARTMENT OF REVENUE
STATE OFFICE BUILDING
POUCH SA
JUNEAU, ALASKA 99811

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BY 8/17/81

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243-7003

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NAME MAILING ADDRESS DATE

Bernard J. King Box 17300 Big Lake 99687 8/12/81
 Debbie Thompson Box 1455 Palmer 99645 8/12/81
 Cathy J. Rodgers Box 1456 Palmer 99645 8/12/81
 Linda D. Eggert Box 1496 Palmer 99645 8/12/81
 Russell W. McLeod 2641 W. 27th Ave Anchorage 99503 8/12/81
 John King Sta. Rt. D, Box 9970 Palmer 99645 8/12/81
 Pamela A. Atkinson P.O. Box 905 Palmer 99645 8/12/81
 Bob Brown Box 1247 Palmer 99645 8/12/81
 Patricia J. King Box 1237 Palmer AK 99645 8/12/81
 Janet Johnson SRD 9723 Palmer AK 99645 8/12/81
 Ann Adams PO 1781 Palmer AK 99645 8-12-81
 Richard E. Shula Sr. Rt. Box 3218 Wasilla AK 99687 8-12-81
 Gary E. Liberman SR. 3246 Wasilla Ak. 99687 8-12-81
 Doreen Johnson SRD 9723 Palmer AK 99645 8-12-81
 Charles K. Lusk Box 1130 Wasilla, AK 99687 8-12-81
 Steve D. Sand Box 3117 Palmer AK 99645 8-12-81
 Michael C. Harris Box 676 Palmer AK 99645 8-12-81
 Momi Tipler Box 611 Palmer AK 99645 8/14/81
 Hazel G. Skirwood Box 11-32 Palmer AK 99645 8/14/81
 Beverly A. Lewis Melton Box 595 Palmer AK 99645 8/14/81
 Kim Kaembaen Box 115 Wasilla 99687 8/14/81
 Evelyn Thompson Box 33 Palmer 99687 8-14-81
 Marilyn M. M... Box 219 Wasilla AK 99687 8-14-81
 Harold A. Newcomb Box 237 " " 8-14-81
 Ophe J. Hunt SRB Box 7308 Palmer AK 99645 8-14-81
 Lyrene A. Peterson PO Box 1146 Wasilla AK 99687 8-14-81

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NAME	MAILING ADDRESS	DATE
<i>[Handwritten Name]</i>	<i>6357 C. Taylor Lane Anchorage</i>	<i>8-14-81</i>
James Vari	JAMES VARI Box 724, WASILLA, AK.	4
<i>[Handwritten Name]</i>	<i>PO Box X Palmer, AK 99645</i>	"
<i>[Handwritten Name]</i>	<i>P.O. Box 2001 Palmer, AK</i>	<i>8-14/81</i>
<i>[Handwritten Name]</i>	<i>Box 611 Palmer, AK 99645</i>	"
<i>[Handwritten Name]</i>	<i>S.P.A. Box 3174 Palmer, AK</i>	<i>8-14-81</i>
<i>[Handwritten Name]</i>	<i>S.P.A. Box 3177 Palmer, AK</i>	<i>8-14-81</i>
<i>[Handwritten Name]</i>	<i>S.P.A. Box 3178 Palmer, AK</i>	<i>8-14-81</i>
<i>[Handwritten Name]</i>	<i>PO Box 131, Palmer, AK 99645</i>	<i>8-14-81</i>
<i>[Handwritten Name]</i>	<i>PO Box 2707 Palmer, AK 99645</i>	<i>8-15-81</i>
<i>[Handwritten Name]</i>	<i>St. Paul's C. Box 8086</i>	"
<i>[Handwritten Name]</i>	<i>Box 124 Palmer, AK 99645</i>	<i>8-15-81</i>
<i>[Handwritten Name]</i>	<i>Box 126 Palmer, AK</i>	<i>8-15-81</i>
<i>[Handwritten Name]</i>	<i>Box 127 Palmer, AK</i>	<i>8-15-81</i>
<i>[Handwritten Name]</i>	<i>Box 133 Palmer, AK</i>	<i>8-15-81</i>
Kirch K. Moore	Box 993 Palmer	8-15-81
<i>[Handwritten Name]</i>	<i>Box 436 Palmer, AK</i>	<i>8-15-81</i>
<i>[Handwritten Name]</i>	<i>Box 135 Palmer, AK</i>	<i>8-15-81</i>

wish we had more time

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NAME	MAILING ADDRESS	DATE
Ed Frandsen	Box 1666 - Wasilla	8-11-81
Robert L. Cheek	P.O. Box 328, Wasilla	8-11-81
Billie Ann Neamen	Harwin, Alaska 99571	8/11/81
Ed Cottle	Box 341, Wasilla AK 99657	8-11-81
John L. Delme	Box 798 Palmer AK 99665	8-11-81
Walter H. Helmer	Box 1908 Palmer AK	8-11-81
Ken K... ..	P.O. Box 997 Palmer AK 99645	8-11-81
Clyde Oberg	SRA Box 8933, Palmer AK 99665	8-11-81
Kyle Nease	Box 742 Palmer AK	8-11-81
Barry B. Cook	SRD Box 9290 PALMER, AK	8-11-81
Carl D.	Box 1141 Palmer AK	8-11-81
Steve M... ..	Box 922 Palmer AK	8-11-81
Frederick	Box 1676 Palmer AK	8-11-81
Edward S.	Box 1285 Palmer AK	8/11/81
Antoni	P.O. Box 1441 Wasilla, Alaska	8-11-81
Dennis Wilson	P.O. Box 1406 PALMER AK	8-11-81
Penny - Frobridge	RIAR KI A Box 817 Palmer	8-11-81
Margie Bryne	Box 1584 Palmer	8-11-81
Berry	P.O. Box 745 Palmer	8-11-81
Charles	P.O. Box 1078 Palmer	8-11-81
Lucas	S.R. Box 2274 Palmer	8-11-81
Agnes	Box 584 Palmer	8-11-81
Kurtis	S.R.B. 1462 Palmer	8-11-81
Sheila Johnson	P.O. Box 691 Palmer	8-12-81

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NAME

MAILING ADDRESS

DATE

~~Alvin Ray Stummala 217 Ave Rd 9-12-81~~
 Jay Ostrowski Box 2925, Palmer, AK Aug 12, 1981
 J. J. Baker 7301 679 "concluding" # 44572 Aug 13, 1981
 J. D. Miller Box 2723 Palmer AK Aug 12, 1981
 Helen M. Jones P.O. Box 2073 Palmer AK Aug 12, 1981
 Mrs. J. Lee 782 Palmer AK Aug 12, 1981
 Robert D. Rebin 5 KA 2nd 1981 Palmer Alaska
 Peter Campbell Box 417, Palmer, Alaska Aug 13, 1981
 Esther Cornelius Box 452 Palmer Alaska Aug 13, 1981
 Erma Hewitt Box 3424 Palmer AK Aug 13, 1981
 Ann Connor Box 535 Palmer AK Aug 13, 1981
 P. J. Taylor Box 742 Palmer AK Aug 14, 1981
 Rita Knudsen Box 23 Sutter, AK Aug 4-81

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 Anch, AK 99503
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In reference to the State of Alaska (dated 7/27/81) to all Games of Chance & Skill Permittees: "pull tabs" are not a raffle or lottery authorized by permit and will not be allowed after August 17, 1981. Failure to comply will result in revocation or suspension of said license.

WE, THE UNDERSIGNED, as members and patrons of Sitka Moose Lodge 1350, a non-profit organization with permit #81-27 believe that "pull tabs" are a raffle or lottery and their use by authorized organizations is allowed. Pull tabs are a major source of income for our organization and discontinuation of this income will severely restrict our ability to contribute to community activities and continue our community responsibilities and obligations. We strongly protest this action and request the Commissioner of Revenue to review his opinion, and to consider the magnitude of the consequences if this action takes place.

NAME (Title)	MAILING ADDRESS	DATE
Wes Simpson	Box 1697 Sitka	8/12/81
Pat Clough	Box 445 "	8/12/81
Steve B. Pites	Box 623 Sitka	8-12-81
Jerry Green	Box 2036 Sitka	8-12-81
H. J. Kites	RD. Sitka	8-12-81
Ray R. Leon	Star Rte Box 2204 Sitka AK	8-12-81
Raymond		
Alvin Emmons	1311 E. Lagoon Dr. Sitka	8-12-81
Walter Emmons	1311 E. Lagoon Dr. Sitka	8-12-81
Clara T. Emmons	Box 1156 Sitka	8-12-81
Rita Fu	Box 1123 Sitka	8-12-81
Robert L. Linn	Box 1123 "	8-12-81
Don Simpson	4117 14th RT Rd	8-12-81
Tacki Peterson	P.O. Box 2108 Sitka Alaska	8-12-81
Kenrick Laid	484	8/12/81
James Barlow	ALASKA MOOSE ASSOC. BOX 712 D R O R I D O N	8-12-81
Barbara Vaught	P.O. Box 2477	8/13/81
Jerry Linder	Box 1120 Sitka	8-13-81
Donald B. Spivey	Box 2235 Sitka	8-13-81
Marlene Stromme	Box 2235 Sitka	8/13/81

MUST BE SUBMITTED TO: TOM WILLIAMS, COMMISSIONER
 STATE DEPARTMENT OF REVENUE
 STATE OFFICE BUILDING
 POUCA CA
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ate of Alaska, Dept. of Revenue
 -1) to all Games of Chance & Skill Permittees: "pull
 are not a raffle or lottery authorized by permit and will not
 be allowed after August 17, 1981. Failure to comply will result in
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 , a non-profit organization with permit #81-27
 believe that "pull tabs" are a raffle or lottery and their use by
 authorized organizations is allowed. Pull tabs are a major source of
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 severely restrict our ability to contribute to community activities
 and continue our community responsibilities and obligations. We strongly
 protest this action and request the Commissioner of Revenue to review
 his opinion, and to consider the magnitude of the consequences if this
 action takes place.

NAME (Title)	MAILING ADDRESS	DATE
James Winters	Box 2266 Sitka	8-12-81
Doreen J. Marvitz	Box 1163 Sitka	8-12-81
Thomas H. Brown	Box 4255 MT. EDGE-CUMBE	8-12-81
Jacob B. Lingsten	Box 995 Sitka	8/12/81
Raymond D. Chyn	Box 445 SITKA	8-12-81
Dorothy McFarland	11 Rt. 4 P. 1R	8/12/81
James B. Patton	Box 1364 SITKA	8-12-81
James W. Brown	Box 4357 net edge - AK	8-12-81
Michael Foster	Box 672 SITKA	8-12-81
Lee Michalski	Box 1481 Sitka	8-12-81
Selma J. Hill	Box 714 Sitka	8/12/81
Horace B. Smith	Box 2233 Sitka	8-12-81
Walter W. Baker	Box 1319 Sitka	8-12-81
Kenneth J. Austin	Box 434 SITKA	8-12-81
Kim A. Lambert	Box 661 Sitka	8/12/81
Robert A. Warner	Box 661 Sitka	8-12-81
Richard L. Kinnery	Box 1610 sitka	8-12-81
Rocky D. Hallock	STRT. 2309 RT 110R SITKA	8-12-81
Ernie F. Soderback	Box 661 SITKA	8-12-81
Allen M. Van Horn	Box 939 Sitka	8/12/81

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NAME (Title)	MAILING ADDRESS	DATE
John P. Finners Governor Moose Lodge	P.O. Box 633 Sitka	8/12/81
Conor Keating Manager	P.O. Box 658 Sitka	8/12/81
A. G. Hudson	P.O. Box 1825 Sitka	8-12-81
Walter Smith	Box 782 Sitka	8-12-81
Larry Harrison Jr. (Governor Moose Lodge)	Sitka P.O. 2108	8-12-81
Paradise Charities	#18 Shiphears	
Wm. Schmidt	#10 Siasiki Sitka Ak.	
George Matty	Box 124 SITKA	8-12-81
Larry Smith	Box 741 SITKA	8-12-81
Paul of the	Box 593 SITKA	8-12-81
Book of the	Box 2211 Sitka	8/12/81
Tom S. Melling	Box 629 Sitka	8-12-81
R. A. Wickham	Box 116 Sitka	8-12-81
Manuel G. Yellie	Box 1632 Sitka	8-12-81
Donna E. Lantz	Box 1163 SITKA	8-12-81
Larry Dumble	Box 364 SITKA	8-12-81
Patricia Reding	Box 658 SITKA	8-12-81
Arman H. Allen	Box 1584 SITKA	8-12-81
Glenn M. Mittingly	Box 124 Sitka	8/12/81
Walter Lantz	Box 712 Sitka	8-12-81
Walter Lantz	Box 881 Sitka	8-12-81

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NAME	MAILING ADDRESS	DATE
John P. Eimers	P.O. Box 663 Sitka Ak	8/12/81
W. O. R. Keenan	P.O. Box 658 Sitka Alaska	8/12/81
A. G. McPhee	P.O. Box 1825 Sitka	8-12-81
Lambertson	P.O. 2108 Sitka	8-12-81
Carolyn E. Portland	# 18 Skiffers	8-12-81
Don J. Skiffers	# 10 Skiffers SITKA, AK.	
George Skiffers	Box 1274 SITKA	8-12-81
Alvin Skiffers	Box 741 SITKA	8-12-81
Carl Skiffers	Box 593 SITKA	8-12-81
Frank Skiffers	Box 2211 Sitka	8/12/81
Tom Skiffers	Box 624 Sitka	8/12/81
Bill Skiffers	Box 116 Sitka	8-12-81
Daniel Skiffers	Box 1632 Sitka	8-12-81
Ernest Skiffers	Box 1163 SITKA	8-12-81
Lloyd Skiffers	Box 364 SITKA	8-12-81
Patrick Skiffers	Box 658 Sitka	8-12-81
Harold Skiffers	Box 1584 SITKA	8-12-81
Paul Skiffers	Box 712 Sitka	8-12-81
Alvin Skiffers	Box 881 Sitka	8-12-81
James Skiffers	Box 2266 SITKA	8-12-81
Don Skiffers	Box 1163 Sitka	8-12-81
Elizabeth Skiffers	Box 1224 Sitka	8/12/81
Robert Skiffers	Box 455 Sitka	8-12-81
Jane B. Skiffers	Box 995 Sitka	8/12/81
Alvin Skiffers	Box 1163 SITKA	8/12-81

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NAME MAILING ADDRESS DATE

NAME	MAILING ADDRESS	DATE
Anna Ballou	Box 1346	8-12-81
Yvonne M. Brown	Box 4337 NATENGEAK	8-12-81
W. K. Fost	Box 672 SITKA	8-11-81
Lee M. ...	Box 1451 Sitka	8-12-81
Selma ...	Box 714 Sitka	9/12/81
Eric ...	Box 2233 Sitka	8-12-81
Walter W. ...	Box 7509 Sitka	8-12-81
Ronald J. ...	Box 634 Sitka	8-12-81
Jim ...	Box 661 Sitka	8/12/81
Richard ...	Box 1610 Sitka	8/12/81
Rodger D. ...	ST. Rt. 230947 HPR SITKA	8/12/81
Chris ...	Box 664 Sitka	8/12/81
Officer ...	Box 929 Sitka	8/2/81
Pat ...	Sitka	8/12/81
Wm ...	Box 1677 Sitka	8/12/81
Steve ...	Box 113 Sitka	8/12/81
Harry ...	Box 2036 Sitka	8-12-81
Paul ...	Box 117 Sitka	8-12-81
Greg ...	Star Rt. Box 2204 Sitka	8-12-81
...
Keith ...	Box 1507	...
Allen ...	1311 Edgewood Dr. Sitka	8-12-81
William ...	1311 Edgewood Dr. Sitka	8-12-81
Richard ...	1412 HPR	SITKA 8-12-81
...	1015 HPR	...

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NAME	MAILING ADDRESS	DATE
James Gordon	Bx 712	8-12-81
Barbara Knight (Hemphill name)	Bx 2477	8/13/81
Jan Lubow	Bx 1100 Sitka AK	8/13/81
Phyllis Doherty	Box 735 Sitka	8/13/81
Lorna Williams	Bx 862 Sitka	8/13/81
Donald B. Strumme	Box 2235 Sitka	8/13/81
Melanie Strumme	Box 2235 Sitka	8/13/81
Bernice Anderson	Box 173 Sitka	
May Davis	Box 1011 Sitka	
Lee E. Parkley	Box 1011 Sitka	
Richard J. Williams	Box 1265 Sitka	
Glenn Howard	Box 1833 Sitka	
Juli Hupp	Box 2323 Sitka	
Michael E. Blake	Box 1107 Mt Edge	
Jason Mulla		
Deanne G. Peters	Box 733 Sitka	
Margaret Peters	Box 733 Sitka	
Connie Wilkins	Bx 893 Sitka	
Dawn, i Kowalski	Box 4867 Sitka	
Paula Arnold	Box 612 Sitka	
Earl D. Arnold	Box 612 Sitka AK 99835	
Karen Smith	Box 2233 Sitka AK 99835	

BY 8/17/81: :

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NAME	MAILING ADDRESS	DATE
Grant Smith	Box 1378	8-13-81
Sabrina Smith	Box 2226	8-13-81
Peta Berg	Box 1632	8-13-81

BY 4/17/81::

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NAME	MAILING ADDRESS	DATE
Penny W Crawford	267 S Klewin	8-12-81
Ging S Williams	2906 W 30th #12	8-12-81
Julia Brown	1400 Keeley Circle	8-12-81
Pat Phillips	58A Bay #177	8-13-81
Nariko Tommets	8434 Ingra	8-13-81
Rasa Sebwanna	82320 Dowling Rd	8-13-81
Julie Kern	4231 Kellin Ln	8-13-81
Rose A White	P.O. Box 10-2191	8/13/81
Charlotte Higgins	1705 Bartlett Dr.	8-13-81
Eileen E. Hoff	1102 Hollywood Dr Apt 2045	8-13-81
Julie M. Hoff	1102 Hollywood Dr. apt 2045	8-13-81
Kerstin Hoff	1102 Hollywood Dr Apt 2045	8-13-81
Jerry Moch		
Walter Finke	435 E 10 99501	8-13-81
Lucy Finke	435 E 10th 99501	8-13-81
Ernie Finke	3831 W. 17th Dr 173	8-13-81
Joyce Tucker	4206 Checkmate Dr Anch 99504	8-13-81
Michael Tortolan	2900 Jones 99503	8-13-81
David Tortolan	" " 99503	8-13-81
Wan Paul Simpson	4110 Debra Sp 180 99504	
Julie Jones	1305 W 47th #41 99503	
Ernst Hyman	1545 S. Hoyt - H 91 99504	
Marna Distobert	3544 De Kiew Anch. Ak 99504	
Deanne Davis	P.O. Box 10-1438 ANCH AK 99511	
Journal Smith	541 E. 10th	
Theresa Walker	541 E. 10th	
Irma Lindgren		
Maria J. ...	4386 R. Bn	8-14-81

MUST BE SUBMITTED TO: TOM WILLIAMS, COMMISSIONER
 STATE DEPARTMENT OF REVENUE
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 243-7003

Submitted by:

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NAME	MAILING ADDRESS	DATE
Willie J. Brown Sr.	1400 ^{AKH} Kelly Circle	8/17/81
Julia Brown	" " "	8/17/81
R. J. Jannus	800-16th #9 Fairbanks	8-12-81
Glenn Melgreen	2705 2nd Ave F	8/12-81
Quinn M. Anderson	2215 3rd St E	8/10/81
Frances Jones	8930 Denberry	8-12-81
Mary Kohl	8001 Duben	8-12-81
Bill Kohl	8001 Duben	8-12-81
John		8-12-81
Carolyn Baker	914 Dymel Cir	8-12-81
G. J. Cannon	21534 W. Kennel Ave	8-12-81
Marianne Lemm	311 Lynwood #5	8/12/81
Joe A. Huzich	5360 Saketis	8-12-81
Jeannie Maxin	Dutton Alaska	8-12-81
D. Watson	3414 E 17th Ave	8-12-81
Donny & Doris	2606 with Tahiti loop Anch.	8-12-81
Eleanor Michel	2702 Kuskokwim Fairbanks	
J. J. Jodinger	2337 E. 8th Anchorage	
A. Dunge	540 E 73rd Anchorage 99502	8-12-81
W. J. Magnus	3701 Eureka Anch 99502	
Donald A. Robinson	2121 M. 15 Dr Anchorage AK 99504	
Rene Maxin	P.O. Box 203 Hakona AK.	
Shirley A. Kohles	6000 Acheson Lane Anchorage Alaska	
Stan Wilson	3109 Cheadler Ave Anch	8/12/81
Joseph Owens	6204 Air Base RD Anch	8/12/81
Dorothy Patrick	Ken Del. Anchorage	
William Kee	2611 Hillside Ave Ft. Richardson 99505	12-8-81
Paul A. Franklin	5-45th St RICH 17K5700 99505-0456	12-8/81

Submitted by:

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TOM WILLIAMS, COMMISSIONER
STATE DEPARTMENT OF REVENUE
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NAME	MAILING ADDRESS	DATE
Debi Deaton	6021 Royal Ct	8/10/81
Sidney Smith	7800 DeBARR	8/10/81
Oswald Moses Sr.	237 Heintzleman Dr.	8-10-81
Lee Thomas	802 Price #6 Anch.	8/10/81
Michelle Inamstadt	8500 La Llamita Dr Anch	8/10/81
Ed Halbrook	5750 Glenn Hwy	8/10/81
Paula Halbrook	5750 Glenn Hwy	8/10/81
Lee J. George	7800 Debarv #10	8-10-81
M.S. Brown	4338 Kaen St	8-10-81
J & White	6037 Tudor Rd	8-10-81
Barbara Goenett	7800 DeBarv ^{SP} 10	8-10-81
Rachel Siper	P.O. Box 817 S. R. AK	8-10-81
Charles E. Anderson	2427 INARA ST	8-10-81
Brooke Hefwith	8629 TOLIFF ANCH 99507	8/10/81
Gladys K. Valdez	501 E. 46 Anch	8-10-81
Donell W. Duff	4250 HANCO ANCH.	99504
Rene A. Hilo	4030 Inne Rd. #13	8-10/81
Barbara Ballou	421-c-Baluga	8-10-81
Marilyn Bradshaw	421-B Baluga	8/10/81
Luby L. Mason	21-376 A Apple	8/10/81
Don BRADSHAW	421B Baluga	8/10/81
Valerie Smith	3149 Raspberry Dr	8-10-81
Helen K. Harmon	4030 Lou Rd #4	8-10-81
Rita A. Bourne	3241 E. 42nd	8-10-81
Sylvia Thorsgren	7505 Alennity Sp35	8-10-81
Paul L. Anderson	806 D-st	8-12-81
Don Schuyf	7501 Foothill Dr.	8/12/81
Paul L. Anderson	P.O. Box 3036 PALMER, AK 99645	8-12-81

Submitted by:

MUST BE SUBMITTED TO:
EARLY AS POSSIBLE
BY 8/17/81!!

TOM WILLIAMS, COMMISSIONER
STATE DEPARTMENT OF REVENUE
STATE OFFICE BUILDING
POUCH SA
JUNEAU, ALASKA 99811

For Accountability:
Please send copy to:
Alaska Bingo Supp
3904 Arkansas Dr.
Anch. Ak. 99503

In reference to the State of Alaska letter dated 7/27/81 stating that "pull tabs" are not a raffle or lottery and their use will not be allowed after August 17, 1981; WE, THE UNDERSIGNED, BEING OVER THE AGE OF 19, protest this action. We believe "pull tabs" are a raffle or lottery and as such their use by authorized organizations is allowed. As members of our community, we also protest losing the benefits of countless community services and projects now being provided by authorized non-profit organizations through the income generated by the sale of "pull tabs".

NAME	MAILING ADDRESS	DATE
Lorena Larson	Box 281, SRH Anch. AK 99507	8-11-81
Judi [unclear]	W. Richardson, 99505	8-11-81
Barbara Brooks	2310 Paxson Dr. 99504	8-11-81
Maria G York	P.O. Box 5-482 Ft. Richardson 99505	8-11-81
Pauline Wells	1851 Falcon Dr 99504	8-11-81
Fannie Anderson	2207 East 3rd Bldg 10 apt E 99501	8-11-81
Maria Paulas	2137 Wayne St Anch. AK 99504	
D. M. Williamson	181 Strand Street Anch. Ak. 99504	
Andres L. Hill	4361 Warwick 99504	
[unclear]	2830 [unclear] at 99507	
[unclear]	SRA 1444-D 99502	
David [unclear]	3000 Jones 99503	8-11-81
Ken Van Clene	1530 Melchior 99501	8-11-81
M. J. Kuti	4444 R 8 Ave 504	8/12/81
Janet Rubin	705 Muldoon Rd Sp 56 99504	8/12/81
Sharon Ricker	10501 Cranberry Anch 99502	8-12-81
Corinne Kerino	420 Mumford #A Anch 99504	8-12-81
Nina Fair	P.O. Box 4-1689 Anchorage 99509	8/12/81
Bradley R. Dickson	2910 Rose Anch AK 99504	
Best Dickson	" " " " " "	
Bunny Johnson	5012 Coll Gate, Anch. Ak 99509	
M. F. [unclear]	2310 Paxson Dr 99504	
I. Henry	3209 Glen Don Anch 99504	
J. [unclear]	429 [unclear] Anch. 99504	8-11-81
[unclear]	[unclear] 99504	8-11-81
[unclear]	[unclear] 99504	8-11-81
[unclear]	7800 K. [unclear] Sp 573 Anch. AK 99504	8-11-81
[unclear]	7817 [unclear] Sp 573 Anch AK 99504	8-11-81

MUST BE SUBMITTED TO: TOM WILLIAMS, COMMISSIONER
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STATE OFFICE BUILDING
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JUNEAU, ALASKA 99811

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Anch. Ak. 99503
213-7003

Submitted by:

KEEP THE FULL AND COMPLETE LISTING

In reference to the State of Alaska letter dated 7/27/81 stating that "pull tabs" are not a raffle or lottery and their use will not be allowed after August 17, 1981; WE, THE UNDERSIGNED, BEING OVER THE AGE OF 19, protest this action. We believe "pull tabs" are a raffle or lottery and as such their use by authorized organizations is allowed. As members of our community, we also protest losing the benefits of countless community services and projects now being provided by authorized non-profit organizations through the income generated by the sale of "pull tabs".

NAME	MAILING ADDRESS	DATE
Eve Wilson	2961 Kimball Ct.	8/12/81
C. Mattice	SRA 304 N Anchorage	
O. J. Taylor	840 Gold Baller Juneau	8/12/81
B. Studnek	727 Rapp Ct 99502	
Bill Thompson	5205 E 26	
Margie Skinner	1232 McCarty St Fairbanks	8/12/81
John Maddness	6465 Lake Otis Rd Anchorage	8-12-81
Maurice Britton	Box 2610 Kodiak AK 99615	8-12-81
Theresa Bonney	1509 W. 46th Anch. Ak.	99503 8-12-81
Molly West Dahl	3801 Eureka anch AK 99502	
Valerie Dollison	540 Munford #4	8/12/81
Joe Nelson	4101 Elm	
Art Hancock	P.O. Box 3326 PALMER, AK.	
Michelle M. Chan	3000 Jones Anch 99503	8/13/81
Jelen M. Dolan	3416 913	
Sue Ann Clark	5401 54th & Hoffman	
Robert N. Segock Sr.	602 N. 6th #12	13 Aug 81
Eleanor M. Hallibur	602 N. 6th #12	13 Aug 81
Katherine Wells	3338 East 72nd Ave	8/13/81
Mary Helen	2604 5th St Ft Richardson Ak	
Laura Helen	2604 5th Ft. Richardson Ak.	8/13
Anna Stanton	410 A 1th Ft. Richardson AK	99503
DeRose Haynes	5335 Sheffield D. Prudhoe Bay	4230
Dwight Bond	Box 172 Chugink AK	99567
Francis W. Alenough	9211 Carbon Rd. Ch.	8/13/81
Carl David	6th Fairbanks St. Anch. AK	99501
Arthur M. Jones	SRA 1449 D	99502
Robert S. Anderson	2801 Westport RD	99501

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POUCH SA
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Anch. Ak. 99503
243-7003

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NAME	MAILING ADDRESS	DATE
Jean Parker	115 A Grand Tany	8-8-81
Margaret Fleming	POB 4-1853 99509	✓
Lou Landolack	3200 Montclair Ct	8-8-81
Howard Ford	"	"
Dorothy Louderback	"	"
B. Z. Mares	P.O. Box 228 WASILLA AK 99687	AUG 18
Hanna Williams	7904 Arkansas	8-8-81
Sophie Menden	SRA Box 4313 99502	8-8-81
Alma S. Paucot	656 Fairview St. Anch. Ak	8-8-81
M. G. Hardaway	2302 W. 4th Anch. Ak.	8/8/81
Beth DeWalt	8120 Greenwood Anch. Ak.	8/8/81
Margie Stewart	3325 Rose St. Anchorage Ak	8-8-81
Cynthia A. Kihula	9499 BRAYTON DR. Sp. 197 ANCH. AK.	8-8-81
Natalia Barenin	Engle River	8-8-81
Doraleen Colon	644 W. 34th #315	8-8-81
Marilyn Russell	2-788 D B St. E.A.F.B.	8-8-81
Daniel S. Payne	8810 Cordell Cir Anch. Ak	8-8-81
J. Miller	4209 Hayes	8-8-81
Paul Kegan	409 R. Leachman Dr	8-8-81
Donna S. Keen	" " "	8-8-81
Mary Kindfather	1100 e Bluff dr	8-8-81
Jim Kindfather	" " "	8-8-81
Kenneth M. Moseley	3551 Midland	8/8/81
Alvin Fisher	1019 Anorage	8/8/81
Jeanne Hayes	Box 6403 Anorage	8/8/81
J. Arnold	2070 Hudson	8-8-81
Peggy L. Buelch	1545 S. 1st #91 99504	8-8-81
Jim Stang	3203 GREENLAND 99503	8-8-81

Submitted by:

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NAME	MAILING ADDRESS	DATE
L. W. [unclear]	801 Airport Hk	SP/33
Barbara O'Leary	P.O. Box 4402, Anch	99509 8/8/81
L. [unclear]	3120 E. 41st	
Dorothy Jeffries	653 E. 79th	
Marie [unclear]	2213 Eagle	
Deborah L. Winter	9499 Brighton #283	
Ann [unclear]	3241 W 69th #3	
Tracy [unclear]	1200 W. Diamond	
Byrd [unclear]	10320 E Veridian Anch, AK	
David [unclear]	5239 Div. Pl. Anch	8/2/81
James O'Day	7100 Lake Otis Rd #23 Anch Alaska	
Chas. Youngblood	6400 E. 16th Apt. B	
Paul Williams	4034 Reba Dr. #4	
Marita Campbell	2410 Lake George	99501
Pauline Swenson	801 Airport Hts Bp 88	99504
Mathe Savonil	801 Airport Hts. B. Sp. 88	99504
Edna Brown	1200 W Diamond #718	
Betty [unclear]	1516 Cook Dr. Anchorage	9/8/81
Ruth Vaughan	7800 DeBarr Sp 228 Anch.	8/9/81
Doug Vaughan	7800 DeBARR SP. 228 Anch.	99504
Bette Johnson	3163 Rindler Dr	
Charles Keenan	P.O. Box 653 Eagle River	
May Samache	P.O. Box 10012 South Sta Anch.	
Shirley Trent	P.O. Box 3-522 ECB Anch.	99501
Pat Pool	Box 3424 Seldotna AK	
Joyce Hunter	2804 Klamath - Anch.	99503
Maries Daniels	3500 Wyoming	99503
Wartickis	8230 Del. St	99502

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NAME	MAILING ADDRESS	DATE
Frank	Box 4-680	8-8-81
Fonda A. Brenner	3437 W. 79 th Anch. 99502	8-8-81
Allen Balog	1200 Diamond E. #719 Anch AK 99502	
Norahy Funder	1754 m Anch Alaska	
Elizabeth Wilson	9101 Elm Anch. AK 99507	
D.L. Evans	2011 ALTONA Anch AK 99502	8-8-81
Betty Hughes	2512 N Tokite Loop Anchorage Alaska 99507	
Dobson Fleming	3541 Winnetta Circle Anchorage, Alaska 99504	
J. Gleason	3829 Young St Citrus 99504	
Sharon Kobuff	Po Box 10841 Anch, AK 99511	8-8-81
Ronald A. Ham	170 GRAND LARRY CT Anch. AK 99504	8-8-81
Sammy Green	170 Grand Larry Anch AK 99504	
Helen Rancio	Pk 2326 Palmer AK 9964	8-8-81
Jean Roggi	Box 283 Seward AK 99664	8/8/81
Bob	4117 McRae Sp. 19B Anch 99504	8-8-81
Dara Palmer	1013 E 20th #D Anchorage	
Thelma Parkerson	1013 E 20th rd Anch ak.	
Ellene Wheeler	SPR Box 2047 anch. 99507	
Woodrow Johnson	7752 Down ct. anch 99504	
Alise Tretzel	Box 491 Wasilla AK	8-8-81
Barbara Kirkman	Box 177 Copper River 8-8-81	
Robert Nelson	206 HIENTE LEMAN 1st 8-8-81	
Jan Buttner	8150 Country Wood Dr 8-8-81	
George W. Stratten	6930 Old Seward Hwy 8-8-81	
Donna K. Tubala	9499 Brimley Dr Sp 197 8/8/81	
Mike Stewart	1001 Brimley Sp 4B 8/8/81	
Julian (Leslie)	3801 F 65th 8/8/81	
Elaine M. Payne	8810 Cordell Cir. #4 8/8/81	

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NAME	MAILING ADDRESS	DATE
E. Ikstnes	2706 FULTON St. Anchorage	8-8-81
M. Anawork	2005 Bonfau Hwy apt 77	8-8-81
R. Anawork	" " " "	8-8-81
L. Ferris	P.O. BOX 10-1702 S.F. Anch AK 99511	
J. Lund	SEA Box 1303E Anch Alaska 99502	
A. Armstrong	1200 W. Divinal Sp. 628	99502
Allen Fisher	1019 W TR Anchorage	
Judy Dickson	2910 ROSA ST.	
Joe Franklin	4240 Selwyn Ft. Rich.	
Dot Sherman	Box 28 Eagle Re. AK. 99577	
Jane Thompson	Box 4-955 (P.O. Box) AK 99509	
Beverly A. Brudwin	P.O. Box 2013 Anch AK 99510	
Rhonda Meister	8112 Huckleberry Anch AK 99502	
Bobby Perry	4002 Barbara Dr. Anch AK. 99503	
Maria J. Walker	811 Elm Street AK 99501	
Karen Nicks	5839 Dowd Pl. Anch. AK. 99507	
Von Haller	4022 Burbank Dr Anch AK 99503	
Kate Hacer	4022 Burbank Dr Anch AK 99503	
MATHIE HARVEY	7506 ZURICH Anch 99507	
Robert		
Kay Cline	644 W 34th Apt 315 Anch. 99503	
Penney L. Miles	1002 W. 30th #21 Anch. 99503	
Wm. Fisher	1417 INLET place	
Celia Mesley	639 E 76 Ave	
Colleen Nelson	1136 W 11th Ave	
Donna Bodiney	300 E. 45 Apt 3 Anchorage	
Jack Costin	4225 S Pine & RD City	
Stan Korman	Box 28 Eagle Re. AK 99577	

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STATE DEPARTMENT OF REVENUE
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NAME	MAILING ADDRESS	DATE
MARIE JAMES	Box 34101 Anchorage	8-11-81
William Thompson		
Judy Jones		
Edward Hubbard	606 Box W 34th Apt #118	8-11-81
Bette Humphrey	1435 1/2 Ingraft 2	
Linda Peterson	900 Box 13016 Anchorage 99502	8-11-81
Lila L. Hubbard	606 W. 34th Apt #118 Anch.	
Marie Anderson	Box 14 Naknek, AK	8-11-81
Lucille Alfred	908 Wildrose Ct.	
Janet G. Foss	2017 N. Rae Rd. Sp1	8/11/81
Charles Bandy	402 Taylor	8/11/81
Harriet Selcup	2705 Klondike	8/11/81
Aue Corzot	1704 Fanning Dr	8/11/81
Muriel Thomas	Box 625 Palmer, AK	8/11/81
Willie Alkisti	232 E 10th	8/11/81
Agnes Lindley	415 E 11th	8/11/81
Edith Engman	3900 Seaford	8-11-81
Diane L. MARTIN	7609 Stanley	8/11/81
Pat Martin	7505 Glenn Hwy	8/11/81
Willie McCall	1340 Airport Hwy	8/11/81
Theresa D. Egan	Gen. Del. Eagle River	8/11/81
Alma Larson	519 E 6th Anch	8/11/81
Marcia V. Marshall	3213 Linden Dr.	8/11/81
Marian Kinneenack	1353 W 27th	8/11/81
Leo Kinneenack	1353 W 27th	8/11/81
Charles Stabig	421 E-ST-ANC	8/11/81
Tom Clarence	722 E 3rd Ave, Rm 2	
Lothi Korte	4007 Plover Dr Anchorage	8-11-81

MUST BE SUBMITTED TO: TOM WILLIAMS, COMMISSIONER
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 215-7003

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NAME	MAILING ADDRESS	DATE
Jessie Ross	5700-Fiji ANC, AK.	8/9/81
Carolee Mae	1545 So Hope ANCH AK	8/9/81
Kimberly Patterson	2627 Terrace Bldg WA.	8/9/81
Patricia Austin	801 Airport Hts Sp 187	8/9/81
Alan Bradshaw	801 " " # 236	8/9/81
Don Bradshaw	801 " " # 236	8/9/81
Mary Johnson	5121 Mills Dr	9/5/81
R. M. ...	PO Box 228	Wasilla, AK
Ann Barth	6033 Tudor Rd	ANCH. AK
Wynne R. Barth	6033 Tudor Rd	ANCH. AK.
E. ...	744 N. Russ #1	ANCH. AK
J. ...	" "	Anchorage, AK.
Heena Dunderoff	Box 10-457	Anchorage, AK.
Melissa White	3740 1/2 W. ...	ANCH 99503
Elena ...	1200 W. ...	ANCH 99502
M. ...	3414 ... Rd Sp	99505
Joe ...	3206 ...	99509
Michael ...	105 ...	Eagle River 8/9/81
Lee A. ...	SEA Box 17	ANCH AK 99502
Diane ...	415 East 9th Ave.	99501
Minnie ...	P.O. Box 653	Eagle River AK 99577
Kathy Dell	Box 7741	ANCHORAGE 99510
Willie Dell	Box 7741	ANCHORAGE. 99510
Adeline ...	P.O. Box 100	Eagle River
Barie ...	111 Agate Cir	ANCH AK 99504
Erin ...	2530 ... Ln #4	99503.
Jerry ...	P.O. Box 10-1365	AK 99507
2515 ...	2515 ...	ANCH AK 99504

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STATE DEPARTMENT OF REVENUE
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3904 Arkansas Dr.
Anch. Ak. 99503
713-7003

EARLY AS POSSIBLE
BY 8/17/81!!

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NAME	MAILING ADDRESS	DATE
Fiona Strout	S.K.H. - Box 491-11	8-13-81
Henry Strout	S.K.H. - Box 491-11	8-13-81
Til W. Sengyk	9211 Carlson Rd	8/13/81
Hildi Frankotack	1559 KARLUK	8/13/81
Minerva Williams	2960 JONES ANCH	8-13-81
L. W. Williams	" " " "	8-13-81
Shirley Browning		4-14-81
Esse Spencer	03176 CAMPBELL AIRSTRP AK	8-14-81
Irma Oksanen	Box 671 Whittier AK 99193	8-14-81
Margaret DeTrick	1200 Dismal Ct. Ft 719	
Kim Adams	647 E 74 Apt #1	8/15/81
Alma Parrell	323 S. Bering Apt #3	8/15/81
Di A. B.	Box 429	8/15/81
Bryce Casanova	887 LeBar	"
Alma Finne	8930 Woodstock Circle	8/15/81
M. D. Finne	" " "	8/15/81
Marghan Rudnick	4623 Mt. View Dr. #7	8/15/81
Berrie Rudnick	" " " " "	"
Kathie M Cole	1409 E 11th apt 14	8-15-81
Gloria Guerrero	1021 Boniface Pleny. 4-H	8-15-81
Johnnie Mc Min	416 B Beluga Ft Rich	8-15-81
Wmsey Batta	4509 Van Buren	8-15-81
Mary McDonald	5524 Sevin Ln #304	8-15-81
Virginia Hall	2376 Cordova Apt 13	8-15-81
Lou Heerin	SR Box 4697 Eadsburg	8-15-81
Grace Erickson	330 Price St #2A	8-15-81
William Rhoads	1140 E. BLEWETT DR ANCHORAGE	8-15-81
David Swales	" " " " " " " "	" " " " " "

MUST BE SUBMITTED TO: TOM WILLIAMS, COMMISSIONER
 STATE DEPARTMENT OF REVENUE
 STATE OFFICE BUILDING
 POUCH SA
 JUNEAU, ALASKA 99811

For Accountability
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 3904 Arkansas Dr.

EARLY AS POSSIBLE
 BY 8/17/81!!

KEEP THE PULL TAB PETITION

In reference to the State of Alaska letter dated 7/27/81 stating that "pull tabs" are not a raffle or lottery and their use will not be allowed after August 17, 1981; WE, THE UNDERSIGNED, BEING OVER THE AGE OF 19, protest this action. We believe "pull tabs" are a raffle or lottery and as such their use by authorized organizations is allowed. As members of our community, we also protest losing the benefits of countless community services and projects now being provided by authorized non-profit organizations through the income generated by the sale of "pull tabs".

NAME	MAILING ADDRESS	DATE
Lena V. Playle	614 Lynnwood Dr. #2	8/20/81
Lillian Keith		
Lita Lee	2600 Lynn	8/21/81
Timothy Lillo	7301 E 25th Ave	8/21/81
Margaret S. Little	7401 S. 2nd Ave	8/21/81
Marion L. Lohr	4237 Bruce Dr.	8/21/81
John L. Lohr	501 Totank	8-21-81
Pat Collins	" "	8-21-81
Walter Lohr	9301 Northwood	8/21/81
Walter M. Lohr	3807 Tanager 99503	8-21-81
Loretta Kertis	P.O. Box 10-507 Anch.	8-22-81
Emma Rice	2533 Kona Lane Anch.	8-22-81
Edward Rice	2533 Kona Lane Anch.	8-22-81
James M. Rice	Box 1092 Urdorf Ak	8-22-81
Sue D. Lohr	2907 Rowland Dr.	8-25-81
L. Lohr	1210 C. L. Dr.	8-26-81
W. Burnett	Box 2815 RA	8-26-81
W. Lohr	5231 Northwood	8/29/81
Kath. Lohr	705 Muldrew	8/29/81
W. Lohr	624 E 75th	8/30/81
W. Lohr		
Linda Bonnie	4541 Piper St	9/1/81
Milton L. Kelleher	410 Delart 26-T	9/1/81
Peter Lohr	410 Delart 26-T	9/1/81
Barbara (W) Lohr	1311111111111111 Anch.	Sept-12 1981
W. Lohr		
W. Lohr	705 Muldrew	9-17-81

MUST BE SUBMITTED TO:
EARLY AS POSSIBLE
BY 8/17/81!!

TCM WILLIAMS, COMMISSIONER
STATE DEPARTMENT OF REVENUE
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Anch. Ak. 99503

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NAME	MAILING ADDRESS	DATE
John M. Strong	Box 4-885	8/16/81
Kathy A. Green	1001 Boniface	8/16/81
Mary Manann	SRA. Box 163	8-16-81
Kosy Mary Mark	2310 Seward	8/16/81
David L. York	4941 LAUREL	8/17/81
Steve J. [unclear]	4941 Laurel	8/17/81
Alexander J. [unclear]	4170c Laurel	8-17-81
Walter J. [unclear]	3120 E 42nd St	8-17-81
Rosemary [unclear]	2970 Brewster	8-18-81
Leslie Smith	2100 Seward	8-18-81
Keithville [unclear]	SR Box 80 R Anch 99503	
Margie [unclear]	705 Muldoon	8-18-81
Kathy [unclear]	700 DeBore	8-18-81
Kathy [unclear]	SRA Box 847	
Norman Richtoroff	200 N Price #7	8-18-81
Ronaldine Harris	3933 Brewster	8-18-81
Marvin W. Harris	3933 Brewster	8-18-81
Terry Alfonso McDonald	1200 W Diamond #821	8-18-81
Maurice McDonald	1200 W Diamond #821	8-18-81
Lore Marie Hopkins	PO Box 11-1986	99511
Carlye Marie [unclear]	5600 Alameda	8-19-81
Peter M. [unclear]	2600 Diamond	8-19-81
Pam Tierney	305 Lienheart Ct.	8-19-81
Robert [unclear]	305 Lienheart Ct.	8-19-81
Walter [unclear]	P.O. Box 1237	8-19-81
Robert [unclear]	801 Airport #1922	8-19-81
John [unclear]	327 [unclear]	8-19-81
Thuy [unclear]	10-1438	8-19-81

Submitted by:

MUST BE SUBMITTED TO:
EARLY AS POSSIBLE
BY 8/17/81!!

TOM WILLIAMS, COMMISSIONER
STATE DEPARTMENT OF REVENUE
STATE OFFICE BUILDING
POUCH SA
JUNEAU, ALASKA 99811

For Accountability
Please send copy to
Alaska Bingo Supp
3904 Arkansas Dr.
Anch. Ak. 99503

...not
...OVER
... We believe "pull tabs" are a
... authorized organizations
... As members of our community, we also protest losing the
... benefits of countless community services and projects now being
... provided by authorized non-profit organizations through the income
... generated by the sale of "pull tabs".

NAME MAILING ADDRESS DATE

Maurice 771 Wacker Bay Pt. Aly. ak 8-11-81

De L. B. ... De 8-11-81

Marg ... Bay Pt. Aly. ak 8-11-81

... ..

Lillian P. ...

Kat

M.

Ralescous

... ..

... ..

... ..

... .. 8-11-81

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... .. 8-4-81

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EARLY AS POSSIBLE
BY 8/17/81

STATE DEPARTMENT OF REVENUE
STATE OFFICE BUILDING
POUCH 52
JUNEAU, ALASKA 99811

Please send copy to:
Alaska Ringo Supply
1001 ...
Juneau, AK 99801
243-7005

In reference to State of Alaska, Dept. of Revenue letter (par. 9 dated 7/27/81) to all Games of Chance & Skill Permittees: "pull tabs" are not a raffle or lottery authorized by permit and will not be allowed after August 17, 1981. Failure to comply will result in revocation or suspension of said license.

WE, THE UNDERSIGNED, as members and patrons of SPENARD POST # 28 THE AMERICAN LEGION, a non-profit organization with permit #81-115 believe that "pull tabs" are a raffle or lottery and their use by authorized organizations is allowed. Pull tabs are a major source of income for our organization and discontinuation of this income will severely restrict our ability to contribute to community activities and continue our community responsibilities and obligations. We strongly protest this action and request the Commissioner of Revenue to review his opinion, and to consider the magnitude of the consequences if this action takes place.

NAME (Title)	MAILING ADDRESS	DATE
William C. Siebert Cashier	Rt 10-281 Anch AK 99511	Aug 14-81
SANDRA L. STEPHENSON	3701 CORE CT ANCHORAGE	Aug-14-81
Albert J. Dean	7800 Debarre Spc #144	Aug 14, 81
Don Deane	7800 DEBARRE RD. #144	8-14-81
Shirley McDonald	St Rt A Box 144 Willow Alaska	
Larry W. Mulneaux	909 CHUGACH WAY #54 ANCH, AK. ⁹⁹⁵⁰³	8-14-81
Donna McDonald	SRA Box 144 - Willow - Alaska	8-14-81
Michael J. ...	7830 Redwood #11 Anchorage AK 99502	
Roy L. Styer	3701 CORE CT ANCHORAGE	AUG-14-81
Jim Slets	11 11 11	11
Marion L. Myrick	SRA BOX 3500H ANCHORAGE	8-14-81
David L. McCallum	Box 483 SRA ANCH	8-14-81
Shirley McDonald	Box 10092 South STA. ANCH 99502	8-14-81
Elizabeth M. Gullivary	Box 483 SRA ANCH	8-14-81
Robert Walle	5222 E 24 #2 Anch	8-14-81
Robert L. Stephens	1200 W. Diamond #1045 ⁹⁹⁵⁰² Anchorage	8-14-81
Jim Monte-Robert	3503 P STAR ST A ANCHORAGE	8-14-81
James J. L. Jackson	4140 Folker St Sp 26 Anchorage, AK	8-14-81
Robert Daniels	Box 3276 Anch, AK	8-14-81
Ginny Daniels	Box 3276 Anch, AK	8-14-81
David Crystal	1200 W. Diamond #1045 99502	8-14-81

MAIL TO: TOM WILLIAMS, COMMISSIONER (465-2300)
 STATE DEPARTMENT OF REVENUE
 STATE OFFICE BUILDING
 POUCH SA
 JUNEAU, ALASKA 99811

EARLY AS POSSIBLE
 BY 8/17/81!!

Please send copy to: Alaska Bingo Supply
 3904 Arkansas Drive
 Anchorage, Alaska 99503
 243-7003

In reference to State of Alaska, Dept. of Revenue letter (par. 9 dated 7/27/81) to all Games of Chance & Skill Permittees: "pull tabs" are not a raffle or lottery authorized by permit and will not be allowed after August 17, 1981. Failure to comply will result in revocation or suspension of said license.

WE, THE UNDERSIGNED, as members and patrons of SPENARD POST # 28 THE AMERICAN LEGION, a non-profit organization with permit #81-115 believe that "pull tabs" are a raffle or lottery and their use by authorized organizations is allowed. Pull tabs are a major source of income for our organization and discontinuance of this income will severely restrict our ability to contribute to community activities and continue our community responsibilities and obligations. We strongly protest this action and request the Commissioner of Revenue to review his opinion, and to consider the magnitude of the consequences if this action takes place.

NAME (Title)	MAILING ADDRESS	DATE
Rollin Gargin	1378 LA Troch	Aug 14 81
Cecil S. Kemons		
Helen K Lindsay	1200 W. Diamond #45	8-14-81
Anda Bick	3461 TUDOR RD.	8-14-81
Louis Crystal	1200 W Diamond #46	8-14-81
Delores Mobley	P.O 4-1727 Anch, Ak.	8-14-81
E. F. Mahley	P.O 4-1727 Anch, Ak.	8-14-81
C. Soden	1501 Elmendorf Dr	8-14-81
Chas L. Soden	1501 Elmendorf Dr	8-14-81
Betty Kinnaman	9449 Brighton Sp 202	8-14-81
Karen Kinnaman	9449 Brighton Sp 202	8-14-81
Robert C. Joffe	SRA 1764 T Anchorage	8-14-81
Adrian Sperling	1100 E Dowling Rd.	8/14/81
Joe Warren	2614 E 17th	8-14-81
Lester Brown	8490 Hartzell St. Anch AK	8/14/81
Ernest L. Cross	9490 HARTZELL Rd.	8/14/81
George M. Plum	3610 E. 42nd #10	8-14-81
Hazel M. Hamilton	1200 W Diamond	8-14-81
Jerry Morrison	1200 Diamond	8-14-81
Lee S. Fielding	1507 Karluk. Anch.	8-14-81
J. J. Conroy	1604 W. 15th #3	8-14-81

MAIL TO: TOM WILLIAMS, COMMISSIONER (465-2300)
 STATE DEPARTMENT OF REVENUE
 STATE OFFICE BUILDING
 POUCH SA
 JUNEAU, ALASKA 99811

EARLY AS POSSIBLE
 BY 8/17/81!!

Please send copy to: Alaska Bingo Supply
 3904 Arkansas Drive
 Anchorage, Alaska 99503
 243-7003

In reference to State of Alaska, Dept. of Revenue letter (par. 9 dated 7/27/81) to all Games of Chance & Skill Permittees: "pull tabs" are not a raffle or lottery authorized by permit and will not be allowed after August 17, 1981. Failure to comply will result in revocation or suspension of said license.

WE, THE UNDERSIGNED, as members and patrons of Spennard Post #28
The American Legion, a non-profit organization with permit #81-115 believe that "pull tabs" are a raffle or lottery and their use by authorized organizations is allowed. Pull tabs are a major source of income for our organization and discontinuation of this income will severely restrict our ability to contribute to community activities and continue our community responsibilities and obligations. We strongly protest this action and request the Commissioner of Revenue to review his opinion, and to consider the magnitude of the consequences if this action takes place.

NAME (Title)	MAILING ADDRESS	DATE
Jeanine Crossley	6009 W. 75th #3	8-14-81
Eric Reese	130 W. 4th	8-14-81
Carl J. Glauk	1200 W. Diamond	8-14-81
Bill F. Muel	3019 G. Glacier	8-14-81
Carole Muel	3019 G. Glacier	8-19-81
Esther M. Glauk	1200th. Diamond	8-14-81
Sharon J. Anderson	P.O. Box 10-1861 ANCH. AK.	8-14-81
Zenny L. Anderson	P.O. Box 10-1861 ANCH. AK.	8-14-81
Clay Hill	P.O. Box 10-126 ⁹⁵⁵⁴ ANCH AK	8-14-81
Carol Nelson	P.O. Box 10-126 Anch AK	8-14-81
J. B. Oo	SRA Box 483 Anch AK	8-17-81
David Tanner	P.O. Box 392 Eagle River	8-14-81
Deanne Koooff	6460 Lakeview Dr.	8-14-81
J. D. Barry	160 S. Roosevelt ^{ANCH} AK	8-14-81
Bill Jensen	SRA Box 4080	8-14-81
Mona Jensen	same	8-14-81
April Jensen	Box 2 Eagle River	8-14-81
Patricia Pickett	7123 Gilmore Ct	8/14/81
John Pickett Sr.	1123 Hedinger Dr	8/14/81
Walt Lee	1208 Bonnell	8/15/81
Don Dawson	1208 Bonnell	8/15/81

MAIL TO: TOM WILLIAMS, COMMISSIONER (465-2300)
 STATE DEPARTMENT OF REVENUE
 STATE OFFICE BUILDING
 POUCH SA
 JUNEAU, ALASKA 99811

EARLY AS POSSIBLE
 BY 8/17/81!!

Please send copy to: Alaska Bingo Supply
 3904 Arkansas Drive
 Anchorage, Alaska 99503
 243-7003

...ed after August 17, 1981; WE, THE UNDERSIGNED, BEING OVER
 AGE OF 19, protest this action. We believe "pull tabs" are a
 raffle or lottery and as such their use by authorized organizations
 is not allowed. As members of our community, we also protest losing the
 benefits of countless community services and projects now being
 provided by authorized non-profit organizations through the income
 generated by the sale of "pull tabs".

NAME	MAILING ADDRESS	DATE
Mary Halonen	P.O. Box 16 Hooper Bay, AK 99604-0016	8/13/81
Lynda M. Halonen	Hooper Bay AK 99604	8/13/81
Theresa Gump	143 Hooper Bay	8/13/81
Mary Tripp	509 Del Hooper Bay	8/13/81
Gabriel Seton	PO Box 35 Hooper Bay	8/13/81
Katie Mann	Hooper Bay	8/13/81
Joseph Smart	Hooper Bay	8/13/81
Katherine Bell	Hooper Bay	8/13/81
Rachel Smart	Hooper Bay	8/13/81
August Seton	" "	" "
Raymond Sinkov	" "	" "
Charlie Fairley	" "	" "
Peter P. Seton Sr.	" "	8-13-81
Joan Bell	" "	8-13-81
Harold M. Hale	" "	8-13-81
Neva Rivers	" "	8-13-81
Fred Rivers	" "	8-13-81
Maggie Haelscher		
Anna Smart	" "	" "
Frances Hale	" "	" "
Celestine Gump		
Paul Lake	" "	" "
Anthony Timber	" "	" "
Hilda Seton	" "	" "
Carl Smith	" "	" "
George S. Moschler	" "	" "

Hooper Bay City Council

STATE OFFICE BUILDING
 PO BOX 84
 JUNEAU, ALASKA 99811

BY 8/17/81

ALASKA Blaine Supply
 204 Armbrose Dr.
 Anch. Ak. 99503
 243-7063

"pull tabs" are not a raffle or lottery and their use will not be allowed after August 17, 1981; WE, THE UNDERSIGNED, BEING OVER THE AGE OF 19, protest this action. We believe "pull tabs" are a raffle or lottery and as such their use by authorized organizations is allowed. As members of our community, we also protest losing the benefits of countless community services and projects now being provided by authorized non-profit organizations through the income generated by the sale of "pull tabs".

NAME	MAILING ADDRESS	DATE
Teresa Barner	P.O. Box 84	8/13/81
Mary T O'Brien	Hooper Bay	8/13/81
M. A. Nelson	Hooper Bay	8-13-81
Laura Joseph	Hooper Bay	8-13-81
Noel Joseph	Hooper Bay	8-13-81
Natalia Smith		
Johanna Lake	Hooper Bay	8/13/81
Mary M. Timber	Hooper Bay	8/13/81
Jane M. Keene	Hooper Bay	8/13/81
William	Hooper Bay	8-13-81
Lisa Green	" "	" "
Janet Lator	Hooper Bay	8-13-81
Ted Hunter	Hooper Bay	8/13/81
Leo Lator	" "	8/13/81
Theresa Moran	Hooper Bay	8/13/81
Janet Lator	" "	8/13/81
Edna C. Lake	Hooper Bay	8/13/81
Eddie Bell		
Dolores Kawley	Hooper Bay	8/13/81
Nancy Joe	" "	" "
Luille Knight	" "	" "
Angelo Hoelscher	" "	" "
Agnes Murrain	" "	" "
Bridget Joseph	" "	" "

EARLY AS POSSIBLE
BY 8/17/81!!

STATE OFFICE BUILDING
POUCH SA
JUNEAU, ALASKA 99811

Alaska Bingo Supply
3064 Arlberg Dr.
Anch. AL. 99503
245-7003

reference to State of Alaska, Dept. of Revenue letter (par. 9 dated 7/27/81) to all Games of Chance & Skill Permittees: "pull tabs" are not a raffle or lottery authorized by permit and will not be allowed after August 17, 1981. Failure to comply will result in revocation or suspension of said license.

WE, THE UNDERSIGNED, as members and patrons of Hooper Bay City Council, a non-profit organization with permit #81-061, believes that "pull tabs" are a raffle or lottery and their use by authorized organizations is allowed. Pull tabs are a major source of income for our organization and discontinuation of this income will severely restrict our ability to contribute to community activities and continue our community responsibilities and obligations. We strongly protest this action and request the Commissioner of Revenue to review his opinion, and to consider the magnitude of the consequences if this action takes place.

NAME (Title)	MAILING ADDRESS	DATE
Agnes P. Hecker - Mayor	Hooper Bay	8/14/81
Joan Bell - Treasurer	Hooper Bay	8/14/81
Boris Th. Olm - member	" "	8/14/81
Gabriel Leton - Secretary	Hooper Bay	8/14/81
Alice R. Nevelin - member	Hooper Bay	8/14/81
Gladys M. Hale - member	Hooper Bay	8-19-81
Carl Smith - vice Mayor	" "	8/14/81
by _____		

FOCUS EA JUNIAG, ALASKA 99811

AMENDMENT # 1

H.B. 640

SEC. 05.15.210. (15) "Qualified organization" means a bona fide civic or service organization or a bona fide religious, charitable, fraternal, labor political, or educational organization, police or fire department company, dog mushers' association, or fishing-derby or TRADE association in the state, which operates without profit to its members and which has been in existence continually for a period of five years immediately before applying for a license, and the organization may be a firm, corporation, company, association or partnership:



Official Business

Alaska State Legislature

Senate

Committee on Judiciary

Pouch V
State Capitol
Juneau, Alaska 99811

MINUTES OF THE SENATE JUDICIARY COMMITTEE

OF

MARCH 22, 1982

Butrovich Committee Room, State Capitol Juneau, Alaska

Legislation Before Committee:

- SB 845 - "An Act to provide for reinstatement of certain dissolved Alaska Native Claims Settlement Act village corporations to corporate status."
- SB 592 - "An Act providing that the parents of delinquent minors and children in need of aid have the right to counsel in certain proceedings under AS 47.10."
- SB 473 - "An Act relating to urban renewal and development projects of municipalities; and providing for an effective date."
- HB 640 - "An Act relating to games of chance and contests of skill; and providing for an effective date."

The meeting of the Senate Judiciary Committee was called to order by Chairman Rodey at 1:35 P.M. Committee members present were: Senators Rodey, Ray, Parr, and Anderson. Senator Bennett was absent.

003 - Chairman Rodey called the meeting to order.

005 - The first item of business, SB 845, was brought before the committee.

015 - James Kohler, Department of Community and Regional Affairs, testified in favor of the bill, stating that several corporations were dissolved at no fault of their own.

209 - Mr. Kirkpatrick, Director of Banking Securities Corporations, testified stating neither support nor opposition. He only wanted to see clarification of fees due.

443 - Senator Anderson moved that the bill be passed with individual recommendations. There was no objection and the bill was passed with Senators Anderson, Parr, and Rodey signing do pass, Senator Ray signed no recommendation.

463 - Next Chairman Rodey brought HB 640 before the committee.

470 - Chairman Rodey gave the amendments made to the bill.

552 - Chairman Rodey suggested moving the bill from committee and directed staff to prepare a committee substitute to include the new amendments previously adopted by the committee. There was no objection and the committee substitute was passed with Senators Parr, Ray, and Anderson signing do pass. Senator Rodey signed no recommendation.

650 - Chairman Rodey brought SB 473 before the committee.

727 - After discussion, Senator Ray moved that the committee substitute be passed with individual recommendations. There was no objection and the bill was passed with Senators Parr, Rodey, and Anderson signing do pass. Senator Ray signed no recommendation.

730 - The last item on the agenda was SB 592.

745 - Francis Still, representing herself, testified in favor of SB 592.

780 - Senator Parr moved that on Page 1, Line 12, the following be deleted: [to transfer custody, or to appoint a person other than the parent of a child as guardian of the child,]. There was no objection.

795 - Senator Parr moved that the committee pass SB 592 with a committee substitute to be drafted to include the new amendment. There was no objection and the bill was passed with Senator Parr signing do pass. Senators Ray, Rodey, and Anderson signed no recommendation.

802 - Chairman Rodey adjourned the meeting at 2:20 P.M.

COMMITTEE REPORT

SENATE

3/22/82

FURTHER:

Date: MARCH 22, 1982

Mr. President:

The Committee on JUDICIARY has had CSHB 640(Jud)
pull-tab and punchboard games

under consideration and (a majority of the committee) (the committee) reports it back with the following recommendations:

- do pass do not pass
- do pass with attached amendments(s)
- replace with CS for HB 410 same title
 new title
- and recommends DO PASS
- AND attaches a "Letter of Intent" New Fiscal Note
- reports it back without recommendation
- referred to the _____ Committee

MEMBERS SIGNING
DO PASS

MEMBERS HAVING
OTHER RECOMMENDATIONS:

[Signature]

[Signature]

[Signature]

CHAIRMAN

AMENDMENT NO. 2

BY: Judiciary Committee

TO: CS FOR HOUSE BILL NO. 640 (JUD)
am S

Change title to:

"An Act relating to games of chance and contests of
skill; and providing for an effective date."

SENATE AMENDMENT *am#1*

By Senate Judiciary Committee

To: _____ SENATE BILL No. _____

To: _____ HOUSE BILL No. CSHB 640 (Jud)

PAGE: LINE:

On line 9, Page 1, add the following section:

SEC. 05.15.210.(15) "Qualified organization" means a bona fide civic or service organization or a bona fide religious, charitable, fraternal, labor, political, or educational organization, police or fire department company, dog mushers' association, or fishing-derby or TRADE association in the state, which operates without profit to its members and which has been in existence continually for a period of five years immediately before applying for a license, and the organization may be a firm, corporation, company, association or partnership:

On Line 12, Page 1, delete "and punchboard games"

AMENDMENT NO. 2

BY: Judiciary Committee

TO: CS FOR HOUSE BILL NO. 640 (JUD)
am S

Change title to:

"An Act relating to games of chance and contests of
skill; and providing for an effective date."

A M E N D M E N T # 3

Offered in the SENATE

By Sturgulewski

TO: CSHB 640(Jud)

Page 1, line 6:

Delete "pull-tab and punchboard games" and insert "games of chance and skill"

Page 1, after line 8: insert the following new sections:

* Section 1. AS 05.15.040 is amended to read:

Sec. 05.15.040. ISSUANCE AND EFFECT AND TERM OF PERMIT. After the fee is paid, a permit issued, and during the effective period of the permit, the municipality or qualified organization may conduct the activity specified in the permit. If a permit is revoked, the permittee is not eligible for another permit until the expiration of one year from the date of revocation. A permit expires at the end of the period for which it is issued. A permit is not transferable.

* Sec. 2. AS 05.15.100 is amended to read:

Sec. 05.15.100. COMMISSIONER OF REVENUE MAY ISSUE PERMITS. The commissioner of revenue may issue a permit to a municipality or qualified organization. The permit gives the municipality or organization the privilege of conducting bingo, raffles and lotteries, ice classics, rain classics, dog mushers' contests, fish derbies and contests of skill.

* Sec. 3. AS 05.15.120 is amended to read:

Sec. 05.15.120. ELIGIBILITY FOR PERMIT. An applicant shall be a municipality or qualified organization to be eligible for a permit.

* Sec. 4. AS 05.15.140 is amended to read:

Sec. 05.15.140. PROOF NECESSARY TO QUALIFY FOR PERMIT. The commissioner of revenue may not issue or renew a permit except upon satisfactory proof [, SATISFACTORY TO HIM,] that the applicant is a municipality or qualified organization, the activity may be permitted under this chapter, and the issuance of a permit is not detrimental to the best interests of the public. Upon request of the commissioner of revenue, the applicant shall prove conclusively each of these requirements before a permit may be issued or renewed.

* Sec. 5. AS 05.15.150(b) is amended to read:

(b) The net proceeds derived from the activity must be devoted within one year to one or more of the uses stated in (a) of this section. A municipality or qualified [AN] organization desiring to hold the net proceeds for a period longer than one year must apply to the commissioner of revenue for special permission and upon good cause shown the commissioner may grant the request.

Page 1, line 9:

Change "Section 1" to "Sec. 6"

Page 1, after line 15: insert the following:

* Sec. 7. AS 05.15.210 is amended by adding a new paragraph to read:

(22) "municipality" means a political subdivision of the state that is a home rule or general law city or borough or a unified municipality.

Page 1, line 16:

Change "Sec. 2" to "Sec. 8"

SENATE AMENDMENT *Am#1*

BY Senate Judiciary Committee

To: _____ SENATE BILL No. _____

To: _____ HOUSE BILL No. CSHB 640 (Jud)

PAGE: LINE:

On line 9, Page 1, add the following section:

SEC. 05.15.210.(15) "Qualified organization" means a bona fide civic or service organization or a bona fide religious, charitable, fraternal, labor, political, or educational organization, police or fire department company, dog mushers' association, or fishing-darby or TRADE association in the state, which operates without profit to its members and which has been in existence continually for a period of five years immediately before applying for a license, and the organization may be a firm, corporation, company, association or partnership:

On Line 12, Page 1, delete "and punchboard games"



Official Business

Alaska State Legislature

Senate

Judiciary Committee

Pouch V
State Capitol
Juneau, Alaska 99811

MINUTES OF THE SENATE JUDICIARY COMMITTEE

OF

MARCH 5, 1982

Butrovich Committee Room, State Capitol Juneau, Alaska

Legislation Before Committee:

HB 640 - "An Act relating to pull-tab and punchboard games; and providing for an effective date."

SB 175 - "An Act adopting a code of ethics for state officials and state employees; establishing a State Ethics Commission; repealing AS 39.50; and providing for an effective date."

The meeting of the Senate Judiciary Committee was called to order by Chairman Rodey at 1:40 P.M. Committee members present were: Senators Rodey, Bennett, Anderson, Ray, and Parr.

013 - Call to order.

018 - Chairman Rodey brings HB 640 before the committee.

022 - Don Kubley, representing CHAR, testifies in favor of HB 640 and the proposed amendment. See attached amendment.

083 - Senator Ray states that he agrees with pulltabs being legal, but not punchboards.

098 - Senator Bennett moves to adopt amendment #1. There was no objection and it was adopted.

161 - Senator Ray moves to adopt amendment #2 to remove "and punchboard games" on page 1, line 12, out of HB 640. There was no objection and it was adopted.

172 - Senator Bennett moves that HB 640 be passed from committee with individual recommendations. There was no objection. HB 640 was passed with Senator Rodey signing no recommendation, Senators Bennett, Ray, Parr, and Anderson signing do pass.

210 - Chairman Rodey brings SB 175 before the committee.

After brief discussion Senator Rodey suggests that Senator Rodey and Senator Ray form a subcommittee on SB 175 to work out discrepancies with the current bill.

Chairman Rodey adjourned the meeting at 1:50 P.M.



**LOYAL ORDER
OF MOOSE**

FAIRBANKS LODGE No. 1392
CLELAND P. DUNBAR • SECRETARY
507 GAFFNEY RD. • FAIRBANKS, AK 99701

February 22, 1982

Senator Vic Fischer
Pouch V
Juneau, Alaska 99811

Dear Senator Fischer:

This letter is to request your support for the passage of a bill pending in the Alaska State Senate. This bill will once again legalize the sale of pull-tabs and other games of chance.

We at Fairbanks, Lodge #1392, use the proceeds from the sale of these games to support many worthwhile community endeavors and national medical research foundations. Since January 1, 1982, we have had to deny requests of help from several individuals as well as, the abrupt halt of all proposed contributions to charities or civic groups in 1982.

Please help us to help others! Any support you can show for the proposed bill will be greatly appreciated. Enclosed you will find a partial list of the charitable causes we have supported in the past.

Respectfully,



Cleland Dunbar
Secretary

CD/slm

Enc.



LOYAL ORDER OF MOOSE

FAIRBANKS LODGE No. 1392
 CLELAND P. DUNBAR • SECRETARY
 507 GAFFNEY RD. • FAIRBANKS, ALA. 99701

The following is a partial list of the organizations that have received donations from the Fairbanks Loyal Order of Moose within the last three years.

Girl Scouts	\$ 2,780.00
Boy Scouts	2,780.00
Campfire Girls	2,780.00
U S O	5,000.00
Alaska Crippled Chi'dren	2,780.00
Red Cross	1,500.00
Literary Council	1,865.00
Santa's Clearing House	6,000.00
Youth Hockey	3,300.00
United Way	1,500.00
M S	1,000.00
Special Olympics	1,000.00
Close-Up Foundation	1,169.00
Northern Region Volleyball	300.00
West Valley Band	870.00
Firemen's Association	950.00
M D A	525.00
Fairbanks Junior Bowling	980.00
North Pole Wrestling	1,750.00
Fairbanks Softball	1,950.00
Cancer Fund	500.00
West Valley Basketball	1,500.00
Little League	1,250.00
Youth Soccer	450.00
Lions	1,600.00
Fairbanks Women's Softball	175.00
Four H	150.00
Shrine Crippled Children	500.00
React	300.00
Alaska Peace Officers	125.00
Fairbanks Junior Basketball	856.00
Youth Bowling	992.00
Sweet Adelines	500.00
Acalia Chapter #5	100.00
Mooseheart Bowling	750.00
Kids Christmas	200.00
West Valley Yearbook	280.00
Delta Yearbook	110.00
Blizzard	96.00

TOTAL \$ 51,213.00

January 20, 1982

Celia Ringstad
502 Monroe Street
Fairbanks, AK 99701

Dear Celia,

In the past, we have been fortunate enough to be in a position to donate to many civic and charitable organizations. However, we are unable to contribute to anyone at this time.

Sincerely,

Cleland Dunbar
Secretary

January 20, 1982

Jaylin Kay
P. O. Box 97
Fairbanks, AK 99707

Dear Jaylin,

In the past, we have been fortunate enough to be in a position to donate to many civic and charitable organizations. However, we are unable to contribute to anyone at this point in time.

Sincerely,

Cleland Dunbar
Secretary

January 20, 1982

Joe Curry
403 Wedgewood, J-5
Fairbanks, AK 99701

Dear Joe,

In the past, we have been fortunate enough to be in a position to donate to many civic and charitable organizations. However, we are unable to contribute to anyone at this point in time.

Sincerely,

Cleland Dunbar
Secretary

MEMORANDUM AUG 28 1981 State of Alaska

TO: Joseph K. Donohue OFFICE OF THE COMMISSIONER
Deputy Commissioner
Department of Revenue

DATE: August 28, 1981

FILE NO: J-66-137-82

WILSON L. CONDON
ATTORNEY GENERAL

TELEPHONE NO: 465-3600 ext. 60

FROM: 
By: Susan A. Burke
Assistant Attorney General

SUBJECT: Legality of "pull-tabs"

You have asked our department for an opinion concerning the interpretation of certain provisions of AS 05.15 relating to the scope of gaming activities that may be conducted under a permit issued to a qualified organization. Specifically, you have inquired whether certain devices known as "pull-tabs," "rip-offs" or "rippies" are permitted under the applicable statutes and regulations governing games of chance or skill.

You have described "pull-tabs" as follows: A purchaser buys a card. The card has figures printed on it that are covered by a sticker or by rub-off ink. The purchaser removes the sticker or rubs off the ink, and the figures are then revealed. The cards frequently will have combinations of figures similar to those on a slot machine (bells, cherries, etc.) or figures representing poker hands. Certain combinations of figures will entitle the purchaser to a cash prize, usually ranging from \$1.00 to \$100.00.

Under AS 05.15.100, the commissioner is authorized to issue permits to certain organizations to conduct the following specified activities, "bingo, raffles and lotteries, ice classics, rain classics, dog mushers' contests, fish derbies and contests of skill." It is clear that pull-tabs, if permitted at all, would be authorized under "raffles and lotteries," as none of the other categories of permitted activities embraces this type of game. Under AS 05.15.210(16), "raffle and lottery" are defined together as follows:

"raffle and lottery" means the selling of rights to participate, and the awarding of prizes, in the specified game of chance sometimes known as a raffle or lottery, conducted by the drawing for prizes by chance.

Unfortunately, this definition is rather circular. It defines "raffle and lottery" as a game "known as" a raffle or lottery. The definition does, however, include the three elements that courts have traditionally listed as the elements of a lottery; that is, the elements of consideration, prize, and chance. See, Morrow v. State, 511 P.2d 127 (Alaska 1973). Under this definition of a lottery, courts have broadly interpreted both statutes and constitutional provisions banning "lotteries" as including a wide range of gaming activities, far beyond the activity of selling tickets and drawing the winning ticket stub from a fishbowl or other container. See, e.g., Johnson v. Phinney, 218 F.2d 303 (5th Cir. 1955) (pinball machine is a lottery); In re Interrogatories of Governor re Racing Sweepstakes Act, 585 P.2d 595 (Colo. 1978) (sweepstakes is a lottery where winning ticket is determined by the order of digits selected by a mechanical device); Greater Loretta Improvement Association v. State, 234 So.2d 655 (Fla. 1970) (bingo is a lottery); Hendrix v. McKee, 575 P.2d 134 (Ore. 1978) (electronic punchboards are lotteries); State ex rel. Schillberg v. Safeway Stores, Inc., 450 P.2d 949 (Wash. 1969) (scheme using rub-off cards with a bingo type of game in sales promotion was a lottery). However, there is at least a suggestion that our legislature may have intended something narrower in its definition of lottery than the broad definition of lottery that has developed judicially.

It has been held that the term "raffle" is a certain type of lottery. For example, in United States v. Baker, 364 F.2d 107 (3rd Cir. 1966); the Court stated:

The simplest form of [lottery] is the well-known raffle wherein a prize is awarded to the person holding the ticket, the number or name upon which corresponds to that on the counter-foil or ticket stub drawn at random from a container in which have been placed the stubs of all the tickets distributed.

Id., at 111.

Under AS 05.15.210(16), "raffle and lottery" are defined together, with the singular verb form "means," and the definition refers to a singular "specified game of chance . . . conducted by the drawing for prizes by chance." (Emphasis added.) Thus, it would be a reasonable interpretation of the

Joseph K. Donohue
Re: J-66-137-82

August 28, 1981
Page 3

definition of "lottery" to limit it to the traditional raffle type of lottery, because of the particular way in which the definition links "raffle" with "lottery". In our opinion, however, the broad authority granted to the commissioner to adopt regulations under AS 05.15 governing the manner in which authorized games are to be conducted, coupled with the circularity of the definition in AS 05.15.210(16), provides sufficient basis for the department to reach an equally reasonable conclusion that "lottery" was intended to include activities broader than the traditional activities associated with "raffles."

In fact, your department has a long standing interpretation of "raffle and lottery" that is considerably broader than that of a traditional raffle -- ticket stubs drawn from a fishbowl. In 1960, the same year that AS 05.15 was enacted, your department adopted regulations under the authority granted in AS 05.15.060. Under AS 05.15.060(7), the commissioner is required to adopt regulations governing "the method and manner of conducting activity and awarding prizes or awards, and the equipment which may be used." Under this broad authority the commissioner adopted 15 AAC 05.410, which sets out the activities that are permissible as "raffles and lotteries." This regulation apparently distinguishes between "raffles and lotteries" in which "drawing" from a container (in the sense of a traditional raffle) is an essential characteristic of the permitted activity, and those in which "drawing" in that sense is not.

Under section 410(5) the department has authorized "special-draw" winners which are determined by means "other than drawing from a container." That subsection then goes on to list and describe eleven games that qualify as "special-draw" games. Judging from the descriptions of some of these games, it is apparent that the department in the past has interpreted the definition of "raffle and lottery" fairly broadly, and has even given the term "drawing" in the statutory definition a broad reading. For example, it is difficult to discern a traditional type of "drawing" in the "hamster game" authorized under sec. 410(5)(K). Under this game, "Hamster is placed in an enclosure with several numbered exit holes. Winner is determined by hole hamster enters." Similarly, the element of a traditional "drawing" seems totally absent in such authorized games as the dart games and the bean guess game.

We believe that the definition of "raffle and lottery" in AS 15.15.210(16) is sufficiently ambiguous that your department is within its regulatory authority to interpret the definition as broadly as it has done under 15 AAC 05.210. We believe

Joseph K. Donohue
Re: J-66-137-82

August 28, 1981.
Page 4

it would be equally within the department's authority to choose a more narrow construction of the terms "lottery" and "drawing" in the statutory definitions. Should the department choose to adopt a very narrow construction, then the existing regulations authorizing such games as "hamster" and "bean guess" should be repealed. Similarly, the use of pull-tabs by qualified organizations would not be appropriate under a narrow reading of the statutory definition.

If, on the other hand, the department believes that the purposes of AS 05.15 would be served by permitting pull-tabs to be sold by qualified permit holders, we believe that the department would be within its statutory authority to adopt a regulation permitting pull-tabs. Certainly the pull-tabs that you have described come within the judicially developed definition of a lottery. The three elements of consideration, chance and prize are certainly present. While the pull-tabs do not involve the traditional ticket stubs drawn from the fishbowl aspect of a raffle, there is at least more of an element of a "drawing" with the pull-tabs than with the hamster game. The purchaser of a pull-tab could reasonably be said to be drawing his or her ticket when the card is purchased. See, State v. Gattling, 230 A.2d 147 (N.J. Super. 1967).

In short, we are of the opinion that the department has the authority to permit pull-tabs if as a matter of policy it wishes to do so. We do not, however, believe that a fair reading of the department's existing regulations authorizes the use of pull-tabs. Under 15 AAC 05.410(1) - (3), the following definitions appear:

- (1) On-premise raffle or lottery means winners must be present at the place of drawing;
- (2) Off-premise raffle or lottery means winners do not have to be present at the place of the drawing.
- (3) Draw-raffle winners are determined by drawing from a container.

Arguably these sections draw a distinction between raffles and lotteries, since it is only "draw-raffle" winners who are determined by "drawing from a container." Conceivably the failure to have included "lottery" in subsection (3) evidenced an intent that lottery winners could be determined by

some sort of drawing other than from a container. The correctness of this interpretation, however, is made doubtful by the provisions of 15 AAC 05.410(5), which provides, without distinguishing between raffles and lotteries:

"Special-draw winners are determined by means other than drawing from a container"

Subsection (5) then goes on to list the kinds of games that are included in the "special-draw winner" category. This list of games is clearly limited to the ones specifically listed, and does not include pull-tabs.¹

In summary, we believe that the department has the authority under AS 05.15 to adopt a regulation adding pull-tabs to the list of "special-draw winner" games. Similarly, the department has the authority to decline to do so, as well as to repeal those regulations that authorize games that go beyond a narrow construction of "raffle and lottery." We understand that a large number of qualified organizations that currently hold permits under AS 05.15 have been raising money through selling chances on pull-tabs for some years, and that recently the department notified all permit holders that pull-tabs were not authorized games of chance under their permits. While we agree with the department's interpretation of its existing regulations, we also believe that it is within the department's discretion to withhold active enforcement against pull-tabs pending one of two events. If the department determines that it should consider adopting a regulation authorizing the sale of pull-tabs by qualified organizations, then it could suspend enforcement against them while the department conducted the notice and hearing procedures under the Administrative Procedures Act (AS 44.62). On the other hand, if the department determines that it does not want to consider the regulation adopting alternative, it could suspend enforcement against pull-tabs for a reasonable period of time in order to give the legislature an opportunity to clarify the definition of lottery in the statute.

SAB:dlm

We are aware of the fact that an informal memorandum of advice from our department dated August 20, 1965, reaches a different conclusion, at least with respect to punchboards. Having reviewed that memorandum, we believe that its reading of the term "container" is somewhat strained. While we believe that there are arguments to support our earlier advice, we recommend that if you decide to amend your regulations you should address the punchboard question specifically in your regulations.

K
J
C

000
file

Ketchikan Indian Corporation
(IRA Council)
P.O. BOX 6855
429 DEERMOUNT AVENUE
Ketchikan, Alaska 99901

BOARD OF DIRECTORS
(IRA Council)

MARY E JONES
President

WILLIAM C THOMAS
Vice-President

DOLLY JENSEN
Secretary

DEBRA KRAUS
Treasurer

MARY E GUTHRIE
Councilwoman

FLOYD GUTHRIE
Councilman

ALFRED JACKSON
Councilman

JAKE LAUTH
Councilman

EDWARD K THOMAS
Executive Director

February 3, 1982

Patrick Rodey, Chairman
Senate Judiciary Committee
601 W. 5th Avenue
Suite 820
Anchorage, Alaska 99501

Dear Mr. Chairman:

The Ketchikan Indian Corporation is the federally recognized tribal government for the Natives residing in the Ketchikan Gateway Borough, as sanctioned under the Indian Reorganization Act of 1934, as amended for Alaska in 1936.

At a special meeting of the Council of the Ketchikan Indian Corporation, a motion was made and duly passed, supporting Senate Bill number 632, an act relating to games of chance and contests of skill, and providing for an effective date.

The Council of the Corporation is aware of the many benefits that the community receives as a result of these activities, and would like to see these activities continued and improved upon in a fashion as outlined by Senate Bill Number 632.

Any assistance you can give in the adoption of this Bill will be very much appreciated.

Sincerely,



Edward K. Thomas
Executive Director

EKT/emg



LOYAL ORDER of MOOSE

ANCHORAGE LODGE NO. 1534



File
4211 ARCTIC BLVD.
99503
Anchorage, Alaska

21 January 1982

Anchorage, Alaska

Representative Dick Randolph
Alaska State Legislature
Pouch V, State Capitol
Juneau, Alaska 99811

Dear Representative Randolph:

Thank you very much for your letter explaining the problems surrounding the use of "pull-tabs" and other games of skill and chance for raising funds for charitable purposes.

We certainly agree with your analysis of the problem and the value of changing the regulations. Our Lodge has in the past made a considerable number of contributions, quite significant in their total, to local community service and charitable groups. These funds have come almost exclusively from the proceeds of our pull-tab program. In point of fact, all proceeds were used exclusively for charitable contributions.

We wish to encourage you to take those steps you feel appropriate to the end, to modify the regulations that prevent us from conducting a pull-tab program.

Due to the lack of any evidence of any clear and present danger to the citizens of our State posed by a pull-tab game of chance and our desire to use the proceeds for the betterment of the citizens of our State, we whole-heartedly support a change in the regulations to allow their use.

Certainly, we would be willing to cooperate and comply with any reasonable reporting requirements for the purpose of insuring the proceeds are indeed being used to cover only the expenses associated with the program and those charitable purposes already noted.

If we can help in any way, please contact us at 4211 Arctic Blvd, Anchorage, 99503, 272-4752.

Respectfully yours,

Melvin L. Bunch
Melvin L. Bunch, Governor

James E. Fox
James E. Fox, Secretary

CC: Governor Jay Hammond
Lt. Governor Miller
✓ Alaska Senate Members
Alaska House Members



file
✓
General
of Anchorage
+ shell

PHONE 277-8615 ● P.O. BOX 773 ● ANCHORAGE, ALASKA 99510
● LOCATION: 737 WEST 5TH AVENUE

A NON-PROFIT CIVIC ORGANIZATION

January 12, 1982

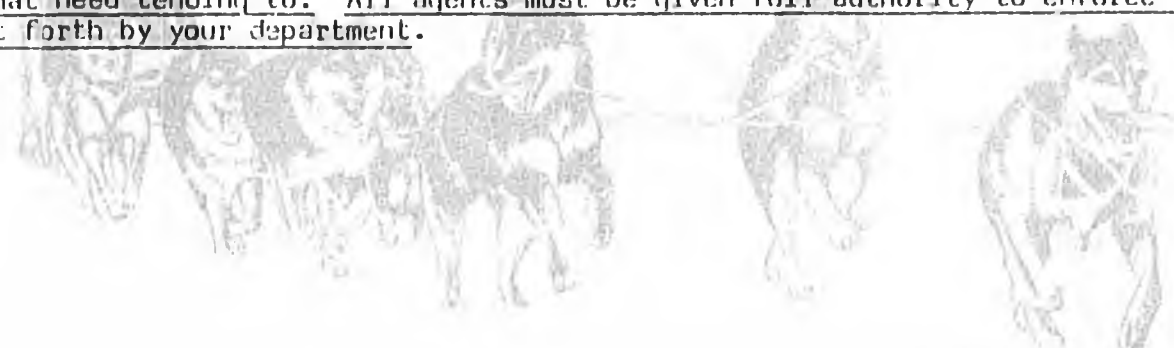
Thomas K. Williams,
Commissioner
Department of Revenue
State Office Building
Pouch SA
Juneau AK 99811

Dear Commissioner Williams:

This letter will inform you that as of December 31, 1981, Greater Anchorage Inc., d/b/a/ Anchorage Fur Rendezvous closed its Rony Palace Bingo Hall. After careful review, in order to comply with State rules and regulations governing the use of "pull tabs" we found we would be unable to operate without considerable losses and therefore made the difficult decision to cease all Bingo operations.

Fur Rendezvous, for the first time in several years, is now facing financial problems. Our organization, however, was not built or has become successful without having pitfalls along it's 47 years in existence. We, therefore, will dig in once again, fall back, regroup and find alternative methods to solve what currently appears "very black".

Our organization has conducted its Bingo operations over the years completely within the compliance of the Alaska statutes. We would like to feel that all the halls in the Anchorage area have operated under these same conditions. We feel this is not the case, however, as some of the halls are continuing to use pull tabs. Not in the same manner of course, but nevertheless they are in use and it is our total understanding they are to be NON-EXISTENT. If we are incorrect, and this is not the case, please let us know so we may re-open our operation. On the other hand, if we are correct we request the statutes be enforced so all are treated equal. Our concern is that your department enforce the rules and regulations you have set forth and that all abide by them. We do not feel Fur Rendezvous should suffer just because it does not want to take the chance of "being caught". It is the enforcement rather than the rules that need tending to. All agents must be given full authority to enforce the laws set forth by your department.



CONTINUED.....

Page 2

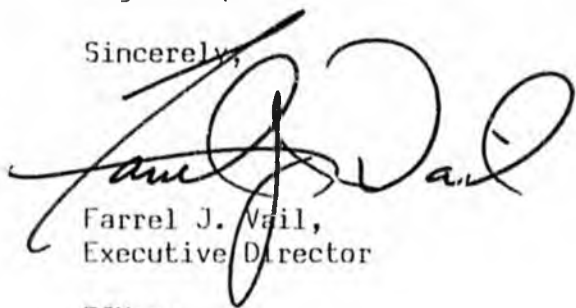
T.K. Williams-continued

1-12-82

In the future, if and when the "rules and regulations" become a matter for legislative decision, we strongly urge restrictions on the permit holders. They should be issued to non-profit organizations who are actually engaged in running the games. For it is those permit holders who "sell" their permits to individuals who have personal, profitable gain that are causing the legitimate operations difficulties.

Please know we pledge our support to your department and offer any assistance you might require.

Sincerely,



Farrel J. Vail,
Executive Director

FJV:rc

cc: Wilson L. Condon, Attorney General
Dick Randolph, Chairman, Administrative Regulation Review Committee
Rep. Mitch Abood
Rep. Charles G. Anderson
Rep. Ramona Barnes
Rep. M.F. Beirne
Rep. Helma Buchholdt
Rep. Bernie Bylsma
Rep. Sam Cotten
Rep. David Cuddy
Rep. Joe L. Hayes
Rep. Terry Martin
Rep. Russ Meekins, Jr.
Rep. Ray H. Metcalfe
Rep. Joe Montgomery
Sen. Brad Bradley
Sen. Mike Colletta
Sen. M. Ed Dankworth
Sen. Vic Fischer
Sen. Tim Kelly
Sen. Patrick Rodey *FYI*
Sen. Terry Stimson
Sen. Arliss Sturgulewski

STATE OF ALASKA

DEPARTMENT OF REVENUE

OFFICE OF THE COMMISSIONER

JAY S. HAMMOND, GOVERNOR

POUCH 5
JUNEAU, ALASKA 99811
PHONE: (907) 465-2300

February 22, 1982

The Honorable Patrick M. Rodey
Chairman
Senate Judiciary Committee
Room 125 - Capitol Building
Juneau, Alaska

Dear Senator Rodey:

Re: CS for House Bill No. 640 (Judiciary)

CS for House Bill No. 640 (Judiciary), an Act relating to pull-tab and punchboard games, upon first reading in the Senate on February 18, 1982 was referred to the Senate Judiciary Committee.

For the consideration of the Senate Judiciary Committee, I am enclosing a copy of a Fiscal Note prepared by Mr. Phillip A. Wall, Director, Public Services Division and a copy of a memorandum from Mr. Ervin Jones, Office Audit Manager, Audit Division of the Department of Revenue concerning the Committee Substitute.

Sincerely,



R. D. Stevenson
Special Assistant

Enclosure

cc: Joseph K. Donohue
Deputy Commissioner
Department of Revenue

Phillip A. Wall, Director
Public Services Division
Department of Revenue

Ervin Jones, Office Audit Manager
Audit Division
Department of Revenue

I. REQUEST
 Bill/Resolution CSHB 640 (Judiciary)
 Title "An act relating to games of chance and contests of skill and prov. for an
 Requested by House Rules Committee Date Feb. 10, 1982 eff.
 date."

II. FISCAL DETAIL
 Agency Affected Department of Revenue
 Program Category Affected Revenue Collection and Management
 BRU, Program, Or Subprogram(s) Affected Public Services
 (Note: If more than one budget component is affected, separate line-item
 amounts and funding for each component in the analysis section.)

EXPENDITURES (Thousands of Dollars) None

	FY 82	FY 83	FY 84	FY 85	FY 86	FY 87
100 PERSONAL SERVICES						
200 TRAVEL						
300 CONTRACTUAL						
400 COMMODITIES						
500 EQUIPMENT						
600 LAND & STRUCTURES						
700 GRANTS, CLAIMS, ETC.						
TOTAL						

FUNDING (Thousands of Dollars) None

	FY 82	FY 83	FY 84	FY 85	FY 86	FY 87
GENERAL FUND						
FEDERAL FUNDS						
OTHER (Specify Source)						

POSITIONS None

	FY 82	FY 83	FY 84	FY 85	FY 86	FY 87
FULL TIME						
PART TIME						
TEMPORARY						

III. ANALYSIS (See Fiscal Note Preparation Instruction, Section III)

See attached memo from E. Jones to R.D. Stevenson, dated February 16, 1982.

IV. DATE 2/10/82 PREPARED BY Phillip A. Wall
 AGENCY Department of Revenue
 PHONE 465-2307
 Original: Legislative Finance
 cc: Budget and Management
 Prime Sponsor (First Legislator Named)

MEMORANDUM

State of Alaska
Department of Revenue

TO: R.D. Stevenson
Legislative Assistant

DATE: February 16, 1982

FILE NO:

TELEPHONE NO:

FROM: Eryin Jones
Office Audit Manager
Audit Division

SUBJECT: CSHB 640
(Judiciary)

Section One of this bill would serve to add pull-tabs and punchboards to the list of authorized games of chance. This language would categorize pull-tabs and punchboards as raffles and lotteries and would subject them to the same statutory and regulatory restrictions. It also limits the price per chance to \$1 or less. I assume that this means a maximum charge of \$1 for a single pull-tab and would not allow charging a greater amount for pull-tabs which have more than one chance to win (e.g. a \$5 pull-tab which offers 5 winning combinations). The Department of Revenue, in enforcing this new provision, would use that assumption as a guideline.

Commissioner Williams' statement (in his letter of February 1) to Representative Ramona Barnes regarding the necessary amendments to achieve the Governor's approval, is still valid and should be considered. I have attached a copy of that letter for reference.

Attachment

EJ:jg

February 1, 1982

The Honorable Ramona Barnes, Chairman
House Judiciary Committee
Pouch Y
Juneau, AK 99811

Re: Suggested changes in HB 640 so that only pull-tabs and punchboards are added to authorized games of chance and skill

Dear Madam Chairman:

At your request the following language is suggested for HB 640 so that only pull-tabs and punchboards of one dollar or less are added to the currently authorized games of chance and skill:

"BE IT ENACTED BY THE LEGISLATURE OF THE STATE OF ALASKA:

* Section 1. AS 05.15.210(16) is amended to read:

(16) "raffle and lottery" means the selling of rights to participate, and the awarding of prizes, in the specified kinds of games of chance sometimes known as pull-tab and punchboard games in which the price of each chance is \$1 or less and in the specified kind of game of chance sometimes known as a raffle or lottery, conducted by the drawing for prizes by chance.

* Sec. 2. This Act takes effect immediately in accordance with AS 01.10.070(c)."

In order to satisfy the Governor's requirement that the issue be placed before the voters before pull-tabs and punchboards are authorized, Section 2 in the preceding draft would have to be replaced by the following two sections:

* * Sec. 2. The Lieutenant Governor shall place the following question on the next general election ballot:

Shall this Act, amending the Bingo, Raffles and Ice Pools Act to extend the definition of raffles and lotteries so as to include games of chance sometimes known as pull-tab and punchboard games, in which the price of each chance is \$1 or less, take effect?

Yes

No

* Sec. 3. This Act takes effect upon certification of the election results by the Lieutenant Governor, showing that the majority of the voters casting ballots voted in favor of enactment, but no sooner than January 1, 1983.*

I hope these suggestions will be of assistance to your Committee in your deliberations on HB 640. Please do not hesitate to contact me if you or the Committee have any further questions on this matter.

Very truly yours,



Thomas K. Williams
Commissioner of Revenue

TKW:tw

cc: Governor Jay S. Hammond

Rep. Dick Randolph

Original sponsors: Randolph, Moss
and O'Connell

Offered: 2/9/82
Referred: Rules

1 IN THE HOUSE

BY THE JUDICIARY COMMITTEE

2

CS FOR HOUSE BILL NO. 640 (Judiciary)

3

IN THE LEGISLATURE OF THE STATE OF ALASKA

4

TWELFTH LEGISLATURE - SECOND SESSION

5

A BILL

6

For an Act entitled: "An Act relating to pull-tab and punchboard games; and
7 providing for an effective date."

8

BE IT ENACTED BY THE LEGISLATURE OF THE STATE OF ALASKA:

9

* Section 1. AS 05.15.210(16) is amended to read:

10

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12

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chance sometimes known as a raffle or lottery, conducted by the drawing

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for prizes by chance;

16

* Sec. 2. This Act takes effect immediately in accordance with AS 01.10.-

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070(c).

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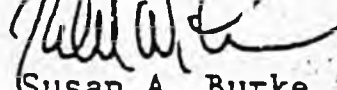
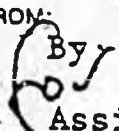
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ALASKA DEPARTMENT OF REVENUE
MEMORANDUM AUG 28 1981 State of Alaska

TO: Joseph K. Donohue OFFICE OF THE COMMISSIONER
Deputy Commissioner
Department of Revenue
DATE: August 28, 1981
FILE NO: J-66-137-82

WILSON L. CONDON
ATTORNEY GENERAL

TELEPHONE NO: 465-3600 ext. 60

FROM: 
By  Susan A. Burke
Assistant Attorney General

SUBJECT: Legality of "pull-tabs"

You have asked our department for an opinion concerning the interpretation of certain provisions of AS 05.15 relating to the scope of gaming activities that may be conducted under a permit issued to a qualified organization. Specifically, you have inquired whether certain devices known as "pull-tabs," "rip-offs" or "rippies" are permitted under the applicable statutes and regulations governing games of chance or skill.

You have described "pull-tabs" as follows: A purchaser buys a card. The card has figures printed on it that are covered by a sticker or by rub-off ink. The purchaser removes the sticker or rubs off the ink, and the figures are then revealed. The cards frequently will have combinations of figures similar to those on a slot machine (bells, cherries, etc.) or figures representing poker hands. Certain combinations of figures will entitle the purchaser to a cash prize, usually ranging from \$1.00 to \$100.00.

Under AS 05.15.100, the commissioner is authorized to issue permits to certain organizations to conduct the following specified activities, "bingo, raffles and lotteries, ice classics, rain classics, dog mushers' contests, fish derbies and contests of skill." It is clear that pull-tabs, if permitted at all, would be authorized under "raffles and lotteries," as none of the other categories of permitted activities embraces this type of game. Under AS 05.15.210(16), "raffle and lottery" are defined together as follows:

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Unfortunately, this definition is rather circular. It defines "raffle and lottery" as a game "known as" a raffle or lottery. The definition does, however, include the three elements that courts have traditionally listed as the elements of a lottery; that is, the elements of consideration, prize, and chance. See, Morrow v. State, 511 P.2d 127 (Alaska 1973). Under this definition of a lottery, courts have broadly interpreted both statutes and constitutional provisions banning "lotteries" as including a wide range of gaming activities, far beyond the activity of selling tickets and drawing the winning ticket stub from a fishbowl or other container. See, e.g., Johnson v. Phinney, 218 F.2d 303 (5th Cir. 1955) (pinball machine is a lottery); In re Interrogatories of Governor re Racing Sweepstakes Act, 585 P.2d 595 (Colo. 1978) (sweepstakes is a lottery where winning ticket is determined by the order of digits selected by a mechanical device); Greater Loretta Improvement Association v. State, 234 So.2d 655 (Fla. 1970) (bingo is a lottery); Hendrix v. McKee, 575 P.2d 134 (Ore. 1978) (electronic punchboards are lotteries); State ex rel. Schillberg v. Safeway Store, 450 P.2d 949 (Wash. 1969) (scheme using rub-off car was a bingo type of game in sales promotion was a lottery). However, there is at least a suggestion that our legislature may have intended something narrower in its definition of lottery than the broad definition of lottery that has developed judicially.

It has been held that the term "raffle" is a certain type of lottery. For example, in United States v. Baker, 364 F.2d 107 (3rd Cir. 1966), the Court stated:

The simplest form of [lottery] is the well-known raffle wherein a prize is awarded to the person holding the ticket, the number or name upon which corresponds to that on the counter-foil or ticket stub drawn at random from a container in which have been placed the stubs of all the tickets distributed.

Id., at 111.

Under AS 05.15.210(16), "raffle and lottery" are defined together, with the singular verb form "means," and the definition refers to a singular "specified game of chance . . . conducted by the drawing for prizes by chance." (Emphasis added.) Thus it would be a reasonable interpretation of the

definition of "lottery" to limit it to the traditional raffle type of lottery, because of the particular way in which the definition links "raffle" with "lottery". In our opinion, however, the broad authority granted to the commissioner to adopt regulations under AS 05.15 governing the manner in which authorized games are to be conducted, coupled with the circularity of the definition in AS 05.15.210(16), provides sufficient basis for the department to reach an equally reasonable conclusion that "lottery" was intended to include activities broader than the traditional activities associated with "raffles."

In fact, your department has a long standing interpretation of "raffle and lottery" that is considerably broader than that of a traditional raffle -- ticket stubs drawn from a fishbowl. In 1960, the same year that AS 05.15 was enacted, your department adopted regulations under the authority granted in AS 05.15.060. Under AS 05.15.060(7), the commissioner is required to adopt regulations governing "the method and manner of conducting activity and awarding prizes or awards, and the equipment which may be used." Under this broad authority the commissioner adopted 15 AAC 05.410, which sets out the activities that are permissible as "raffles and lotteries." This regulation apparently distinguishes between "raffles and lotteries" in which "drawing" from a container (in the sense of a traditional raffle) is an essential characteristic of the permitted activity, and those in which "drawing" in that sense is not.

Under section 410(5) the department has authorized "special-draw" winners which are determined by means "other than drawing from a container." That subsection then goes on to list and describe eleven games that qualify as "special-draw" games. Judging from the descriptions of some of these games, it is apparent that the department in the past has interpreted the definition of "raffle and lottery" fairly broadly, and has even given the term "drawing" in the statutory definition a broad reading. For example, it is difficult to discern a traditional type of "drawing" in the "hamster game" authorized under sec. 410(5)(K). Under this game, "Hamster is placed in an enclosure with several numbered exit holes. Winner is determined by hole hamster enters." Similarly, the element of a traditional "drawing" seems totally absent in such authorized games as the dart games and the bean guess game.

We believe that the definition of "raffle and lottery" in AS 15.15.210(16) is sufficiently ambiguous that your department is within its regulatory authority to interpret the definition as broadly as it has done under 15 AAC 05.210. We believe

Joseph K. Donohue
Re: J-66-137-82

August 28, 1981
Page 4

it would be equally within the department's authority to choose a more narrow construction of the terms "lottery" and "drawing" in the statutory definitions. Should the department choose to adopt a very narrow construction, then the existing regulations authorizing such games as "hamster" and "bean guess" should be repealed. Similarly, the use of pull-tabs by qualified organizations would not be appropriate under a narrow reading of the statutory definition.

If, on the other hand, the department believes that the purposes of AS 05.15 would be served by permitting pull-tabs to be sold by qualified permit holders, we believe that the department would be within its statutory authority to adopt a regulation permitting pull-tabs. Certainly the pull-tabs that you have described come within the judicially developed definition of a lottery. The three elements of consideration, chance and prize are certainly present. While the pull-tabs do not involve the traditional ticket stubs drawn from the fishbowl aspect of a raffle, there is at least more of an element of a "drawing" with the pull-tabs than with the hamster game. The purchaser of a pull-tab could reasonably be said to be drawing his or her ticket when the card is purchased. See, State v. Gattling, 230 A.2d 147 (N.J. Super. 1967).

In short, we are of the opinion that the department has the authority to permit pull-tabs if as a matter of policy it wishes to do so. We do not, however, believe that a fair reading of the department's existing regulations authorizes the use of pull-tabs. Under 15 AAC 05.410(1) - (3), the following definitions appear:

- (1) On-premise raffle or lottery means winners must be present at the place of drawing;
- (2) Off-premise raffle or lottery means winners do not have to be present at the place of the drawing.
- (3) Draw-raffle winners are determined by drawing from a container.

Arguably these sections draw a distinction between raffles and lotteries, since it is only "draw-raffle" winners who are determined by "drawing from a container." Conceivably the failure to have included "lottery" in subsection (3) evidenced an intent that lottery winners could be determined by

some sort of drawing other than from a container. The correctness of this interpretation, however, is made doubtful by the provisions of 15 AAC 05.410(5), which provides, without distinguishing between raffles and lotteries:

"Special-draw winners are determined by means other than drawing from a container

Subsection (5) then goes on to list the kinds of games that are included in the "special-draw winner" category. This list of games is clearly limited to the ones specifically listed, and does not include pull-tabs.¹

In summary, we believe that the department has the authority under AS 05.15 to adopt a regulation adding pull-tabs to the list of "special-draw winner" games. Similarly, the department has the authority to decline to do so, as well as to repeal those regulations that authorize games that go beyond a narrow construction of "raffle and lottery." We understand that a large number of qualified organizations that currently hold permits under AS 05.15 have been raising money through selling chances on pull-tabs for some years, and that recently the department notified all permit holders that pull-tabs were not authorized games of chance under their permits. While we agree with the department's interpretation of its existing regulations, we also believe that it is within the department's discretion to withhold active enforcement against pull-tabs pending one of two events. If the department determines that it should consider adopting a regulation authorizing the sale of pull-tabs by qualified organizations, then it could suspend enforcement against them while the department conducted the notice and hearing procedures under the Administrative Procedures Act (AS 44.62). On the other hand, if the department determines that it does not want to consider the regulation adopting alternative, it could suspend enforcement against pull-tabs for a reasonable period of time in order to give the legislature an opportunity to clarify the definition of lottery in the statute.

SAB:d1m

¹We are aware of the fact that an informal memorandum of advice from our department dated August 20, 1965, reaches a different conclusion, at least with respect to punchboards. Having reviewed that memorandum, we believe that its reading of the term "container" is somewhat strained. While we believe that there are arguments to support our earlier advice, we recommend that if you decide to amend your regulations you should address the punchboard question specifically in your regulations.

K
J
C

OOB
file

Ketchikan Indian Corporation
(IRA Council)
P.O. BOX 6855
429 DEERMOUNT AVENUE
Ketchikan, Alaska 99901

BOARD OF DIRECTORS
(IRA Council)

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EDWARD K. THOMAS
Executive Director

February 3, 1982

Patrick Rodey, Chairman
Senate Judiciary Committee
601 W. 5th Avenue
Suite 820
Anchorage, Alaska 99501

Dear Mr. Chairman:

The Ketchikan Indian Corporation is the federally recognized tribal government for the Natives residing in the Ketchikan Gateway Borough, as sanctioned under the Indian Reorganization Act of 1934, as amended for Alaska in 1936.

At a special meeting of the Council of the Ketchikan Indian Corporation, a motion was made and duly passed, supporting Senate Bill number 632, an act relating to games of chance and contests of skill, and providing for an effective date.

The Council of the Corporation is aware of the many benefits that the community receives as a result of these activities, and would like to see these activities continued and improved upon in a fashion as outlined by Senate Bill Number 632.

Any assistance you can give in the adoption of this Bill will be very much appreciated.

Sincerely,



Edward K. Thomas
Executive Director

EKT/emg



PHONE 277-8615 ● P.O. BOX 773 ● ANCHORAGE, ALASKA 99510
● LOCATION: 737 WEST 5TH AVENUE

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A NON-PROFIT CIVIC ORGANIZATION

January 12, 1982

Thomas K. Williams,
Commissioner
Department of Revenue
State Office Building
Pouch SA
Juneau AK 99811

Dear Commissioner Williams:

This letter will inform you that as of December 31, 1981, Greater Anchorage Inc., d/b/a/ Anchorage Fur Rendezvous closed its Rony Palace Bingo Hall. After careful review, in order to comply with State rules and regulations governing the use of "pull tabs" we found we would be unable to operate without considerable losses and therefore made the difficult decision to cease all Bingo operations.

Fur Rendezvous, for the first time in several years, is now facing financial problems. Our organization, however, was not built or has become successful without having pitfalls along its 47 years in existence. We, therefore, will dig in once again, fall back, regroup and find alternative methods to solve what currently appears "very black".

Our organization has conducted its Bingo operations over the years completely within the compliance of the Alaska statutes. We would like to feel that all the halls in the Anchorage area have operated under these same conditions. We feel this is not the case, however, as some of the halls are continuing to use pull tabs. Not in the same manner of course, but nevertheless they are in use and it is our total understanding they are to be NON-EXISTENT. If we are incorrect, and this is not the case, please let us know so we may re-open our operation. On the other hand, if we are correct we request the statutes be enforced so all are treated equal. Our concern is that your department enforce the rules and regulations you have set forth and that all abide by them. We do not feel Fur Rendezvous should suffer just because it does not want to take the chance of "being caught". It is the enforcement rather than the rules that need tending to. All agents must be given full authority to enforce the laws set forth by your department.

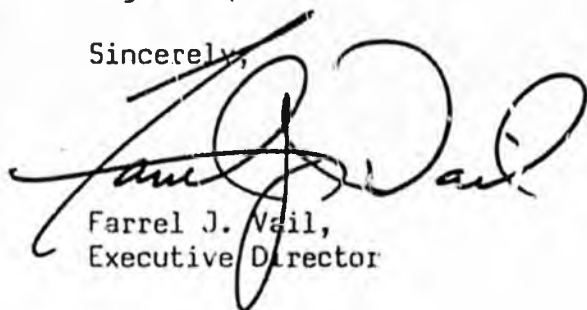
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In the future, if and when the "rules and regulations" become a matter for legislative decision, we strongly urge restrictions on the permit holders. They should be issued to non-profit organizations who are actually engaged in running the games. For it is those permit holders who "sell" their permits to individuals who have personal, profitable gain that are causing the legitimate operations difficulties.

Please know we pledge our support to your department and offer any assistance you might require.

Sincerely,



Farrel J. Veil,
Executive Director

FJV:rc

cc: Wilson L. Condon, Attorney General
Dick Randolph, Chairman, Administrative Regulation Review Committee
Rep. Mitch Abood
Rep. Charles G. Anderson
Rep. Ramona Barnes
Rep. M.F. Beilne
Rep. Thelma Buchholdt
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Sen. M. Ed Dankworth
Sen. Vic Fischer
Sen. Tim Kelly
✓ Sen. Patrick Rodey FYI
Sen. Terry Stimson
Sen. Arliss Sturgulewski