

From:
To: [Oregon Lottery Admin Rules](#)
Subject: Proposed laws
Date: Saturday, July 26, 2025 8:36:58 AM

Kris Skaro,

As an Oregonian, I support the new proposed laws to crack down on lottery misuse. I don't want to see out of state buyers allowed to continue, especially in the bulk-buying scenarios. People should also not be allowed to buy other people's winning tickets at a discount and then claim them at full price. That is allowing some winners to avoid their responsibilities, such as back child support or taxes.

Thank you for taking the steps necessary to protect Oregon's ability to continue in the national lotteries by being good stewards of the management of PowerBall, etc.

From:
To: [Oregon Lottery Admin Rules](#)
Subject: Public comment on HB 3115
Date: Sunday, August 3, 2025 6:33:40 PM

To Whom it May Concern,

I'm emailing to offer my two cents in support of HB 3115, in particular the winner anonymity option. People who win the lottery deserve to keep their financial status private, if they want, to (help) preserve their safety and peace of mind. An anonymous lottery winner can stay in their community and contribute behind the scenes without being hounded out of town by strangers and neighbors alike.

In this day and age, scammers are everywhere and newly rich people are going to be prime targets for fraud (or worse) if people know their "net worth".

The newspaper says that releasing the names of winners helps keep the lottery accountable and fair but I think the newspapers just want to sell a story about the winner and they don't really care about how sudden fame could affect that person's safety and wellbeing.

I also agree with the other changes that preserve the integrity of the games, such as limiting bulk ticket sales.

Thanks for this opportunity,

From: [Dani Rosendahl](#)
To: [Steve Rosendahl](#); [Oregon Lottery Admin Rules](#)
Subject: Bulk Purchase Notice of Rulemaking
Date: Friday, August 15, 2025 1:03:08 PM

Kris Skaro
Oregon State Lottery
500 Airport Road SE
Salem, Oregon 97301

Via Email To lottery.adminrules@lottery.oregon.gov

Re: Bulk Purchase Proposed Rule

Dear Kris,

As a small business owner and registered Oregon Lottery retailer, I'm writing in response to the Lottery's proposed limit on bulk lottery ticket purchases. While the bulk purchase notice states "Lottery does not believe small businesses will be affected by or interested in this rule change," I am writing to express that my small business may be affected by this change, and I ask for the Lottery Commission's consideration in modifying the rule before it is finalized.

As currently written, the bulk purchase restriction would limit purchases by individuals and groups of individuals working together to 50,000 Scratch-It tickets per game and 50,000 unique number combinations for a single drawing. While this seems like a reasonable cap on purchases for an individual or a group of individuals, there is ambiguity as to how or whether this rule would apply to businesses like my own that work with corporate entities that make bulk purchases *without* the intent to buy all possible number combinations.

The Lottery has separately proposed rules to regulate purchases by certain entities acting as couriers, but it's not clear if this cap on "individual" purchases applies to those sales, which also happen in bulk. Given the volume of tickets we process at my location, a 50,000 limit on number combinations for draw games to a single purchaser would reduce the sales at my location and negatively impact my business. Therefore, I'd recommend implementing draw game caps that would allow these types of bulk sales to continue at existing rates (possibly subject to forthcoming regulation), while also ensuring that no one person is able to buy up a meaningful percentage of number combinations to ensure a win. To that end, I recommend the following language:

(4) Bulk Ticket Purchases ~~Prohibited~~ *Restricted*: Lottery games should not be played for investment purposes. *No individual, and no group of individuals acting in concert, may purchase tickets in a manner intended to obtain all, or substantially all, possible winning number combinations for a single drawing or Scratch-It Ticket game.* Unless preapproved by the Director and Commission, an individual or group of individuals working together may not purchase more than 50,000 tickets in the same Scratch-It Ticket game, ~~or more than 50,000~~ *100,000* unique possible winning number combinations for a single drawing *in a draw game that is not a multistate draw game, or more than 250,000 unique possible winning number combinations for a single drawing in a multistate draw game such as Powerball or Mega Millions.*

I appreciate your consideration in this matter.

Thank you,

Steve Rosendahl
Owner, Game Store LLC



Ms. Kris Skaro
Oregon State Lottery
500 Airport Road SE
Salem, Oregon 97301

Via Email To lottery.adminrules@lottery.oregon.gov

Re: Comments Regarding Proposed Rule Prohibiting Bulk Purchases of Lottery Tickets

Dear Ms. Skaro,

On behalf of Global Players Network USA I respectfully submit these comments in response to the Oregon State Lottery's July 11, 2025 Notice of Proposed Rulemaking regarding the prohibition on bulk purchases of lottery tickets (the "Notice").

As detailed in the Notice, the Oregon Lottery proposed this rule in response to incidents that have come to light "in which a group of individuals conspired to purchase all or most of the possible number combinations to ensure a jackpot win." In response to such incidents the Lottery seeks, in part, to "amend its rules as described in this notice to state that bulk ticket purchases intended to guarantee a jackpot or top prize are prohibited unless preapproved by the Director and Lottery Commission." To that end, the Lottery proposed the following language:

(4) Bulk Ticket Purchases Prohibited: Lottery games should not be played for investment purposes. Unless preapproved by the Director and Commission, an individual or group of individuals working together may not purchase more than 50,000 tickets in the same Scratch-It Ticket game or more than 50,000 unique possible winning number combinations for a single drawing.

We respectfully submit that the flat numerical caps in this proposal are more restrictive than necessary to achieve the stated purpose, and are potentially incompatible with the lottery's separately proposed rulemaking regarding courier sales.

We note that the number of combinations required to purchase all or most possible outcomes varies substantially by game. For example, the odds of winning Oregon's Megabucks game are 1:6,135,756. Purchasing 50,000 number combinations secures only 0.8% of the winning number combinations for this game. While the number of Scratch-It tickets issued for any one game are not publicized, it is likely that the Lottery issues fewer than 6,135,756 tickets per Scratch-It game, meaning that 50,000-ticket purchase could represent a far greater share of possible outcomes. For multi-state games, a 50,000 purchase has an even smaller impact: 50,000 unique number combinations equal just .016% of possible combinations for Mega Millions, and 0.017% of the available combinations for Powerball.

This suggests that the proposed draw game limit is set far lower than necessary to prevent the targeted harm, and may unnecessarily reduce Lottery revenue. This concern is heightened given the separately pending rulemaking on courier activity, which assumes that bulk purchases will be permissible in the regular course of operations. As drafted, the bulk purchase rule could require couriers or other entities acting pursuant to a future regulatory structure to obtain separate preapproval for each single drawing in which they exceed 50,000 number combinations, even where no attempt is made to purchase all possible number communications. Such a preapproval process is likely to create inefficiencies and burdens for both the Lottery and the operators.

To address the stated concern—preventing conspiracies to purchase substantially all possible winning combinations—without unduly restricting legitimate activity, we respectfully recommend tailoring the cap to game type and jackpot odds rather than imposing a single flat limit. This will narrowly tailor the restriction to address potentially wrongful conduct, while ensuring that it will not conflict with or impose unnecessarily onerous restrictions on lawful conduct that may be detailed in separate rulemaking. We propose the following language to that end:

(4) Bulk Ticket Purchases ~~Prohibited~~ *Restricted*: Lottery games should not be played for investment purposes. No individual, and no group of individuals acting in concert, may purchase tickets in a manner intended to obtain all, or substantially all, possible winning number combinations for a single drawing or Scratch-It Ticket game. Unless preapproved by the Director and Commission, an individual or group of individuals working together may not purchase more than 50,000 tickets in the same Scratch-It Ticket game, ~~or~~ more than ~~50,000- 100,000~~ unique possible winning number combinations for a single drawing in a draw game that is not a multistate draw game, or more than 250,000 unique possible winning number combinations for a single drawing in a multistate draw game such as Powerball or Mega Millions.

This approach preserves the Lottery's ability to block jackpot-guaranteeing purchases, while avoiding unnecessarily low limits that could restrict lawful bulk purchases contemplated in separately pending regulations.

Thank you for your consideration.

Sincerely,



Michael Platzer

Manager
Global Players Network USA



Hearing Report

Hearing Date & Time: Tuesday, August 19, 2025 10-11 a.m.

Hearing Location: This hearing was held virtually over Microsoft Teams. The public could attend via the URL or by calling in.

Rule Caption: Prohibiting bulk purchases of Lottery tickets

Administrative Rules: Amending:

OAD 177-046-0020	Sale of Tickets and Shares
OAD 177-046-0090	Validation Requirements

Exhibits: Exhibit A, Notice of Proposed Rulemaking filed with the Secretary of State on July 11, 2025, and showing proposed rule changes.

Exhibit B1 and B2, video recording of hearing.

Exhibit C, hearing script.

Summary of Hearing:

I, Kris Skaro, served as the presiding officer for this hearing.

The purpose of the hearing was to take comment on the Lottery's proposed rule changes to prohibit bulk ticket purchases, defined as purchasing more than 50,000 tickets in the same Scratch-it ticket game or more than 50,000 unique possible winning number combinations in the same drawing without preapproval from the director and commission. These changes were reflected in the Notice of Proposed Rulemaking filed with the Secretary of State on July 11, 2025, which is entered into the record of this hearing as Exhibit A.

I convened the rulemaking hearing on Tuesday, August 19, 2025, at 10:05 a.m. Three people joined the hearing online but only one testified. The hearing was recorded to maintain a permanent record. The recording is entered into the record of this hearing as Exhibit B. The hearings officer script is entered into the record as Exhibit C.

To summarize the comments received, Dani Rosendahl is a Lottery retailer who owns Game Store, LLC. She testified that the 50,000 threshold for draw games is too low. The notice explains that the reason for the rules was the situation that occurred in Texas, but in that case, a syndicate bought millions of tickets in order to guarantee a jackpot. According to recent Oregonian reporting, you would need to buy 12 million unique possible winning number combinations to guarantee a jackpot prize in Megabucks and you would need to buy several hundred million tickets to corner the market in a national draw game. Her business sells well over 50,000 tickets in a drawing but she has never attempted to corner the

market or buy all possible winning number combinations. Therefore, she requests Lottery increase the threshold for the number of tickets that can be purchased in a single drawing.

No one else in attendance wanted to speak to the rules. I waited in the virtual hearing room in case more people showed up but no one did. Therefore, I adjourned the hearing at 10:56 a.m.

The written comment period remains open until Friday, August 29, 2025, at 5 p.m. Lottery has received two written comments so far.

Dated this 19th day of August, 2025.

Kris Skaro

Kris Skaro, Presiding Officer

Oregon State Lottery

From: [Mike Platzer](#)
To: [Skaro, Kris](#); [Oregon Lottery Admin Rules](#)
Cc: [Jaclyn Wood](#); [Richard Bulog](#); sarah.koch@orrick.com
Subject: RE: Comments re Proposed Rulemaking
Date: Wednesday, September 10, 2025 9:47:21 PM

Lottery received this request to amend a previous comment after the comment period closed.

Confidential

Dear Ms. Skaro,

In light of recent developments, we'd like to follow up on and amend our August 21 public comment on the Lottery's proposed bulk purchase rule. At that time, we proposed tiered default purchase caps based on game type, with a cap of 250,000 unique number combinations per national lottery draw game, absent Director approval allowing additional purchases.

Last week's record-setting Powerball drawing made clear that demand for these games justifies a significantly higher cap, which will still be effective in preventing conspiracies to purchase substantially all possible winning combinations, without unduly restricting legitimate activity. We propose a revised default cap on national draw games of 1,000,000 unique number combinations, which still represents only approximately 0.3% of available number combinations.

We hope that since the rulemaking schedule has changed and the rule will not be presented to the Lottery Commission until October 31, there might still be an opportunity for this feedback to be taken into consideration.

Regards,

Mike Platzer

Michael Platzer
Manager



E mikep@gpnw.net

From: [Dani Rosendahl](#)
To: [Skaro, Kris](#); [Steve Rosendahl](#)
Subject: Re: Bulk Purchase Notice of Rulemaking
Date: Thursday, September 11, 2025 9:57:02 AM

Lottery received this request to amend a previous comment after the comment period closed.

Dear Ms. Skaro,

In light of recent developments, we'd like to follow up on and amend our August 15 public comment on the Lottery's proposed bulk purchase rule. At that time, we proposed tiered default purchase caps based on game type, with a cap of 250,000 unique number combinations per national lottery draw game, absent Director approval allowing additional purchases.

Last week's record-setting Powerball drawing made clear that demand for these games justifies a significantly higher cap, which will still be effective in preventing conspiracies to purchase substantially all possible winning combinations, without unduly restricting legitimate activity. We propose a revised default cap on national draw games of 1,000,000 unique number combinations, which still represents only approximately 0.3% of available number combinations.

We hope that since the rulemaking schedule has changed and the rule will not be presented to the Lottery Commission until October 31, there might still be an opportunity for this feedback to be taken into consideration.

Sincerely,

Steve and Dani Rosendahl

Game Store

14475 SW Allen Blvd., Suite C

Beaverton, OR 97005