

June 19, 2025

Kome Akpolo
Chief Legal Officer
Arizona Lottery
4740 E. University Drive
Phoenix, AZ 85034

Re: Jackpot.com's Comments in Support of Latest Proposed Arizona Lottery Rulemaking

Dear Mr. Akpolo:

On behalf of our client, Lottomatrix USA, LLC *dba* Jackpot.com ("Jackpot"), we respectfully submit this feedback in support of the proposed amendments to the Arizona Administrative Code governing the Arizona State Lottery Commission. Jackpot is a lottery courier service currently operating in Arizona and is proud to have licenses or registrations in each United States jurisdiction which regulates lottery couriers.

As a stakeholder who will be impacted by the proposed amendments, Jackpot believes that the proposed rules provide excellent consumer protection while upholding the Arizona Lottery's statutory obligation to maximize revenues and maintain the dignity of the State of Arizona. The proposed regulations are consistent with the policies of other states that also regulate lottery couriers. Jackpot welcomes the regulation of lottery couriers and is grateful to the Arizona Lottery for the opportunity to provide input that it believes strikes an appropriate balance of consumer protection and technological innovation.

Lottery couriers like Jackpot provide consumers the opportunity to safely, securely, and conveniently order official state lottery tickets via a website or mobile application. Lottery couriers currently operate in 17 jurisdictions in the United States.

Lottery couriers advance state lotteries by (1) reaching younger demographics and generally attracting attention from adults who are not otherwise playing the lottery; (2) offering a more convenient and safe means of playing the lottery by leveraging the advantages of the internet and responsible gaming protocols; and (3) supplementing state lottery operating budgets and revenues through advertising support and increased ticket sales.

The regulatory framework proposed will ensure standardized practices and uphold public confidence and operational integrity of lottery courier operations. Jackpot is pleased to see that the proposed regulations ensure that only authorized individuals will be able to place an order through a lottery courier service. Jackpot already adheres to the proposed regulatory requirements in Arizona and everywhere else it operates as it pertains to account registration and ticket ordering.

Jackpot offers responsible gambling protections including self-exclusion, access to state and national responsible gaming resources, and maximum default deposit and spend limits which can be lowered by

the customer. Jackpot.com is proud to be iCap certified by the National Council on Problem Gambling due to its significant investment in responsible gambling technology. Lottery couriers have proven effective in attracting new customers and driving incremental revenue for state lotteries where we operate. Jackpot is pleased that the Arizona Lottery has recognized our ability to operate in a regulated environment as a positive which will allow couriers to continue to generate additional revenue for the Arizona Lottery at no additional cost to the state.

Sincerely,

Snell & Wilmer L.L.P.

/s/ Patrick J. Paul

Patrick J. Paul

PJP:CW