

June 23, 2025
Via E-mail to akpolo@azlottery.gov
Kome Akpolo
Chief Legal Officer
Arizona Lottery
4740 E University Drive
Phoenix, AZ 85034

RE: Arizona Lottery Proposed Rules for Lottery Courier Services

Dear Chief Legal Officer Akpolo,

Jackpocket appreciates the opportunity to submit this comment in support of the Arizona Lottery's proposed rules governing the operation of lottery courier services. As the first and largest lottery courier service to be licensed in the United States, Jackpocket has consistently advocated for the adoption of a clear regulatory framework to guide the responsible operation of this emerging distribution channel.

Formalizing the Arizona Lottery's oversight of lottery couriers will provide meaningful benefits to the State of Arizona. By establishing enforceable standards and requirements, the Lottery can ensure that only qualified, compliant lottery courier services are permitted to operate—enhancing consumer protections, driving incremental lottery revenue, and creating transparency and accountability.

New York, New Jersey, Arkansas, and Colorado have already proven that formally regulating couriers fosters successful operations under strong oversight. In these states, couriers like Jackpocket help increase both lottery engagement and revenue while maintaining strong operational and ethical standards. We verify customer age and location, prohibit bulk ticket purchases, and provide responsible gaming tools including spend limits and self-exclusion.

By embracing a regulated courier model, Arizona can offer its residents greater convenience while maintaining the security and integrity of the lottery. We commend the Arizona Lottery's leadership and look forward to the opportunity to collaborate on making the Arizona Lottery even more successful and innovative.

Sincerely,

Jackpocket LLC