



To: Chairmen Leone and Baram, Ranking Members Witkos and Carter, &
other distinguished members of the General Law Committee
From: Anne Noble, President and CEO, CT Lottery Corporation
Re: SB 192: AAC Daily Fantasy Sports
Date: 3/3/16

Position: To be determined. Our understanding is that this bill is a work in progress. Our comments on the raised bill are below. We are pleased to be working in good faith with representatives from daily fantasy sports to help craft mutually agreeable language.

Comments: As proposed, this bill appears to provide some parameters for a regulatory scheme under which fantasy sports operators would be legally permitted to offer “fantasy contests” in Connecticut.

The CT Lottery is not for or against fantasy sports. However, if this raised bill is to move forward as drafted, the CT Lottery respectfully requests that the following items be considered:

1. Clarify potential jurisdictional issues.

The definition of “daily fantasy sports contest” needs to be more narrowly tailored to explicitly state that a “fantasy sports contest” does not include games authorized by the CT Lottery Corporation. There are *lottery* games that, like fantasy sport contests, pay a prize which is dependent upon, or tied to, the outcome of certain sporting events. The CT Lottery is currently reviewing these lottery games. Accordingly, fantasy sports contests should be clearly defined to **exclude** such lottery games so as to coexist, not cannibalize, Lottery revenue. This distinction and recognition of the Lottery as the exclusive provider of lottery games is critical as the offerings of fantasy sports contests transition from season long engagements to contests based solely on the outcome of limited matches or games, the latter suggesting far more in the way of chance than skill.

Consistent with Public Act 15-244, any regulations adopted as a result of this bill, should contain a **prohibition**, not a specification, that daily fantasy sports contests shall not include lottery games (see subpart 2(b)(1) of this raised bill.)

2. Allow the CT Lottery to compete on a level playing field.

CGS §12-806(b)(4) prohibits the CT Lottery from offering “any interactive on-line lottery games, including on-line video lottery games for promotional purposes.” This language prohibits the

Lottery from having a vibrant, modern website which offers our players interactive game experiences to complement their purchase of a lottery ticket at retail and add value to their lottery purchase. This section also prohibits the CT Lottery from offering free play to help promote its games. The CT Lottery's position is that this section of the statute be deleted so that the Lottery may compete on a level playing field with other gaming entities in Connecticut, which use the internet to promote and sell their products.