



Request to Conduct of Raffle Using Alternative Method of Selecting Winners

"Puzzle Piece" Raffle – DENIED

July 17, 2006, Board Meeting

Proposed conduct of the game

The proposed game includes the use of two identical 1,000-piece jigsaw puzzles. One of the puzzles will be assembled and glued together (with the exception of three jigsaw pieces) and serve as the "master puzzle". The three individual jigsaw pieces from the master puzzle will be selected by a "neutral party" and placed in envelopes and serve as the "prize pieces". Each jigsaw piece of the master puzzle will be numbered and have a corresponding number to the identical jigsaw piece from the other identical puzzle. The "loose pieces" from the other identical puzzle will be sold as part of a raffle certificate. The raffle certificate will include the name, address, and other information required under the game rules. Players purchase a certificate including the jigsaw piece and then take their jigsaw piece to the master puzzle to see if it fits one of the missing prize pieces. If a player matches one of the missing jigsaw pieces, they win the corresponding prize. At a preset date/time, if the missing pieces are not filled, the organizers will open the sealed envelopes to reveal the jigsaw piece number(s) and verify the non-present winner(s).

The alternative raffle request was denied for the following reasons:

- Minnesota Statutes, section 349.12, subdivision 33, defines raffle as "a game in which a participant buys a ticket or certificate of participation in an event where the prize determination is based on a method of random selection and all entries have an equal chance of selection." The proposed random selection of the (missing) "prize pieces" is not based on the "entries" but from all of the available pieces and actually takes place prior to the sale of the entry tickets/certificates. The possibility exists that the random selection could include an unsold certificate (jigsaw piece) and therefore a "non-winning" entry and no prize awarded.
- Minnesota Statutes, section 349.173 (b) (1), states in part that "all entries in the raffle have an equal chance of selection." Based on the proposed conduct of the game including the random selection and the physical appearance of the missing pieces, a participant could preview the game pieces for sale and selectively choose or avoid pieces that look different from the missing pieces (such as an end or corner piece of the puzzle with a straight edge). Placing the loose pieces in individual, non-transparent envelopes would address the selective preview but knowing there is still the need to have the corresponding number of the jigsaw piece(s) on the matching certificate could also jeopardize the integrity of the game since the winning pieces have already been determined and the matching numbers known to event organizers (this assumes that the master puzzle and loose copy of the master puzzle would first be assembled and then numbered while assembled to ensure the pieces match).
- Minnesota Statutes, section 349.173 (b) (3 & 4), states in part that "the method of selection is conducted in a public forum" and "the method cannot be manipulated." It appears the selection of the missing pieces is not done in a public forum but by a "neutral party", and once the selection has been completed, the master puzzle is then available for viewing by the public. There is a chance to manipulate the selection; the master puzzle could be examined and the unique number of each missing piece noted and compared with the certificates as they are offered for sale.