

Second-Chance QR Code Promotions for Pull Tabs

Meeting Summary & Regulatory / Compliance Overview

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Executive Summary

This document summarizes a recent discussion with a licensed bingo card and pull-tab manufacturer regarding the opportunity to place **unique QR codes on losing pull tabs** as a *second-chance promotional layer*.

The concept is intentionally designed to:

- Preserve the **integrity of the pull-tab game**
- Avoid any change to **odds, prize structure, or payouts**
- Create an **optional, promotional sweepstakes** that activates *only after a losing outcome*
- Align with established regulatory precedent around second-chance promotions

This approach converts otherwise discarded losing tickets into an additional engagement opportunity **without altering the regulated game itself**.

Core Concept: Second-Chance on Losing Pull Tabs

Pull tabs already resolve a definitive outcome at the moment of play:

- **Winning pull tabs** → prize is claimed immediately
- **Losing pull tabs** → no prize; ticket is typically discarded

The proposed QR implementation applies **only to losing pull tabs**.

Player Flow

1. Player opens a pull tab
2. Pull tab is revealed as **non-winning**
3. Ticket instructs (optional):

“Didn’t win? Scan for a second-chance cash drawing.”

4. Player scans the QR code
5. Player enters a **separate promotional sweepstakes**

At no point does the QR scan affect the pull-tab outcome.

Regulatory & Compliance Positioning

Clear Separation from the Game

The QR sweepstakes is **not part of the pull-tab game**:

- The game outcome is fully determined *before* any scan
- The QR code does not modify or influence odds
- No additional prizes are added to the pull-tab prize pool

This maintains a clean separation between:

- **Regulated gaming activity** (pull tabs)
 - **Promotional activity** (sweepstakes)
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Second-Chance Precedent

Second-chance promotions are a well-established concept across regulated gaming and lotteries:

- Non-winning tickets enter drawings
- Promotional prizes are funded independently
- Participation is optional

The proposed model mirrors these structures and avoids novel regulatory risk.

Optional Participation

Key compliance safeguards:

- Players are **not required** to scan to participate in the pull-tab game
- Scanning is optional and promotional
- No purchase is required to enter the sweepstakes (AMOE provided)
- Odds of winning pull-tab prizes are unchanged

Funding & Prize Independence

All QR-based prizes:

- Are funded from **fixed promotional budgets** (manufacturer, sponsor, or marketing funds)
- Are **not derived from pull-tab wagers**
- Do not increase or redistribute regulated prize payouts

This prevents the QR layer from being classified as gambling.

Why Focusing on Losing Pull Tabs Matters

From a compliance standpoint, this approach is intentionally conservative:

- Avoids interaction with winning tickets
- Avoids confusion at prize redemption points
- Avoids changes to inventory reconciliation
- Avoids interference with existing payout workflows

Operational Considerations

- QR codes can be printed during standard variable-data print runs
- Serialization remains intact
- No changes required to pull-tab game design
- No additional handling for hall staff
- QR engagement is fully digital - can be done on separate kiosk or on personal device

Promotional Use Cases

Second-chance QR sweepstakes may include:

- Weekly or monthly cash drawings
- Instant-win micro prizes (gift cards, prepaid cards)
- Sponsor-funded promotions

All promotions remain **outside** of the pull-tab game.

Data & Auditability

Each QR scan:

- Is one-time use
- Is logged with timestamp and campaign metadata
- Can be audited independently of pull-tab inventory

This creates transparency without adding burden to regulated reporting.

Summary

Placing QR codes on losing pull tabs as a second-chance promotional layer:

- Preserves full regulatory separation
- Does not alter game odds or payouts
- Follows established second-chance precedent
- Monetizes previously discarded inventory
- Creates optional, compliant player engagement