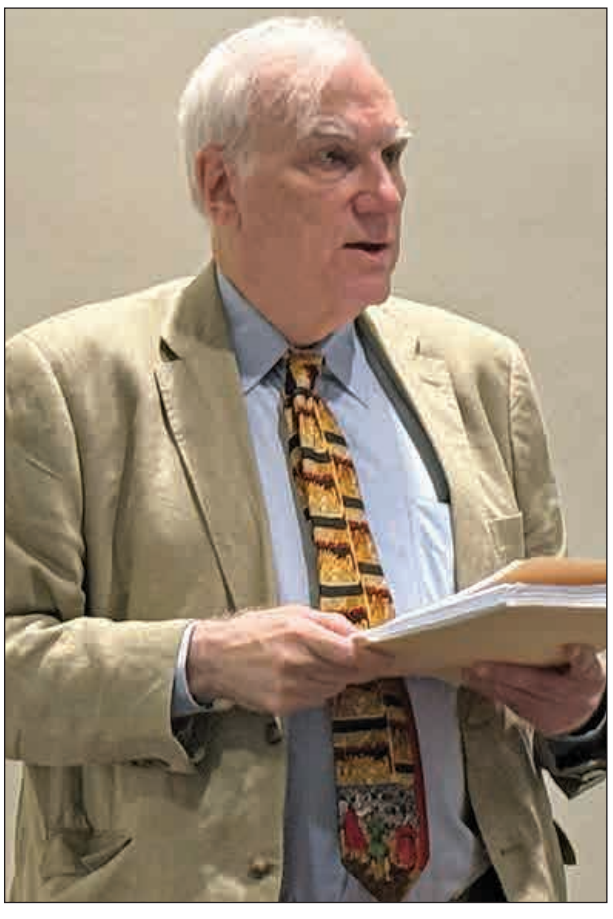
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Gift card rule changes under review





LEFT: GAMOA lobbyist and attorney Les Schneider reviews gift-card information during a membership meeting Oct. 22 in Norcross. RIGHT: Kyle Shepherd, GAMOA treasurer, makes a point during the association's meeting last month. Shepherd was filling in for President Mike Patel. *Paul Tash photos*

By Paul Tash
Georgia Amusement Journal

Proposed rule changes by the Georgia Lottery Corp. (GLC) that would, among other things, clarify that COAM gift cards cannot be used at ATMs or through services that facilitate cash exchanges have been accepted by the Lottery Board and have entered a "very transparent" review process.

For the first time, proposed Lottery regulations are following the Administrative Procedure Act (APA). Legislation in 2025 placed the GLC under the APA to provide additional oversight and "public notice and opportunity" to comment regarding the GLC's rule-making process.

Among its requirements, the APA mandates that proposed rules receive a 30-day public notice, that anyone who requests a copy of the proposed rule receives one, and that proposed rules are shared with the appropriate House and Senate oversight committees so they can weigh in.

"So this is a very transparent process," Les Schneider, attorney and lobbyist for the Georgia Amusement and Music Operators Association (GAMOA) told the group last month. "Everybody gets their two cents in."

See GIFT CARDS, Page 3

MORE INSIDE
What to know about COAM rules **PAGE 4.**

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Small businesses caught in the middle

Skill-games legal fight leaves PA businesses without needed revenue

BillyPenn.com story

For Tariq Khan, losing the skill-games machine at his South Philadelphia convenience store has meant fewer customers, less money coming in and a payroll he says he'll have to cover out of pocket. Now, he fears his business could close.

Khan has operated a 7-Eleven franchise on Snyder Avenue since 2011. He says the slot-machine-like device, which let customers wager money, became a financial lifeline for the store.

"This was one of the great assets we had that could make us money easily," Khan said. "It helped support our families, our employees, and this was a good source of income for the business to keep the door open."

The machine was removed Oct. 16, leaving an empty space in his store and a hole in his revenue.

Customers who came to play often bought drinks or snacks, Khan said. Without the machine, foot traffic and sales have fallen. With grocery costs already squeezing the business, he says he'll have to use his own money to pay some employees' wages this month.

"I think the way the business is going, because the grocery prices are too high," said Khan. "I am thinking this will be shut down if the city of Philadelphia does not return these gaming machines in the near future."

Khan's predicament reflects the stakes for small businesses that came to rely on skill games during years of legal uncertainty.

See SKILL GAMES, Page 7



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Gift cards

from Page 1

The gift card clarification is part of a broader set of draft rule revisions presented to the COAM Advisory Board last month for review. Many of the proposed changes are simple cleanup, such as removing language that repeats statutory provisions.

The Georgia Lottery Board in mid-October approved the proposed regulations for public comment, which triggered the 30-day period for feedback that ends Nov. 13.

The two legislative oversight committees (the House Regulated Industries Committee and the Senate Economic Development and Tourism Committee) will have the opportunity to accept the rules as they are or to make changes, Schneider said. If no changes are made, the Lottery Board has the authority to approve the rules as written. If one or both committees want changes, the Lottery Board can either reject them, potentially killing the proposed rules, or accept the changes. In the latter case, another 30-day public-comment period would be triggered.

"The important thing is that you make sure that your locations are aware (of the proposed regulations) and not to put them in harm's way on this issue," Schneider told GAMOA members.

Gift cards, according to the proposed rules, should not be "ATM compatible" or be able to be exchanged for a money order that can be cashed directly, he said. Gift cards should be used for merchandise and nonmonetary services only, he said.

The only legal redemption options are Lottery tickets, gift cards or replays, Schneider reiterated.

"That's it," he said. "Please remind your locations."

He also noted that gift cards can be used at the location or anywhere else outside of the business.

In other business, Schneider updated GAMOA members on kiosk litigation, increased scrutiny of redemption records and the importance of maintaining the industry's legal compliance and relationships with lawmakers.

A lawsuit involving redemption kiosks will proceed after Superior Court Judge Craig Schwall rejected the Georgia Lottery Corp.'s request to dismiss it, Schneider said. Schwall granted a motion Oct. 21 allowing the case to continue.

The dispute concerns some master licensees' practice of giving location licensees more than the value of the kiosks when providing the equipment, potentially running afoul of inducement restrictions. Schneider said the issue remains subject to litigation.

He also warned that most locations should expect more rigorous audits of how they account for noncash redemptions. Informal tallies "on a 3-by-5" card will not be sufficient to document amounts redeemed for Lottery tickets, gift cards and replays, he said.

"You're going to have to substantiate that," Schneider said. Master licensees can help locations obtain the information needed to support their records, he added.

Schneider urged locations to address recordkeeping before inspectors raise concerns by maintaining accurate records demonstrating compliance with permitted forms of redemption and the 50/50 rule. He cautioned that some inspectors can be demanding on the issue.

Turning to Pennsylvania, Schneider described a decision affecting that state's "semi-skill game" industry as a warning for Georgia operators. The ruling "was a pretty devastating blow to that industry," he said.

He urged members to keep Georgia's industry strong by counseling location owners to operate within the law rather than seek ways around it. Taking too many liberties, he warned, could invite restrictions on the industry.

The Georgia Lottery received $220 million from the COAM industry last year for HOPE and Pre-K educational programs, Schneider said, and the industry also generates other tax revenue for the state. Those contributions could be jeopardized unless members remain vigilant about their business practices and political engagement, he said.

Schneider praised GAMOA members for meeting with their state representatives and senators, making contributions and getting to know them. When lawmakers at the Capitol say they know people in the industry, "it makes a big difference," he said.

Those connections help the industry gain a hearing when it recommends changes to strengthen COAM operations or improve their benefits to the state, Schneider said. He urged members not to underestimate the importance of one-on-one relationships with their local legislators. Maintaining credibility is equally important, he added. Lawmakers appreciate straightforward input from industry members, and GAMOA must continue to uphold that reputation.

"That's the kind of reputation we have to have, the reputation we need to maintain," Schneider said.

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Journal Opinion



BY SIRAJ ROY | *Founder of Coam Tracker*

Georgia's new COAM rules: What every location must know

This article serves as a reminder about what the COAM law that went into effect July 1 allows, what it prohibits, and what it requires. Each point is drawn from Georgia law, the Lottery's rules, its notices and letters, or statements made by Lottery officials on the record.

Approved redemption methods

Under O.C.G.A. § 50-27-71.1, a winning ticket from a Class B machine may be redeemed in four ways only:

- Replays
- Lottery products
- A nonreloadable gift card
- A reloadable gift card

The law is direct: "no other form of redemption shall be allowed."

A store is not required to offer every option. The Lottery's notice on the July 1 changes says a location "may choose to offer lottery products, gift cards, or both," and adds: "Offering both is not required."

A store that is a Lottery retailer may give Lottery products, and the notice asks those stores to "maintain sufficient lottery product inventory." A store that is not a Lottery retailer and wishes to offer Lottery products "should begin the process of applying to become a Lottery retailer," the notice states.

At the Lottery's July 21 COAM Advisory Board meeting, the COAM Division reported that some locations were unaware that "gas and merchandise giveaways were no longer permitted." For the month of July, the division reported 599 inspections and 18 written warnings.

Prohibited payouts and violations

The Lottery's notice leaves no room for doubt. A store that redeems "products or services, other than replays, lottery products, or gift cards, will be subject to enforcement action."

Merchandise and gas. A store may not hand over merchandise or gas in exchange for a winning ticket. That trade is not one of the four approved methods. The lawful route runs through the gift card. The store places the winning ticket amount on a gift card, and the customer may then use the card for "any goods or services which a successful player is entitled or permitted by law to purchase." The winning ticket buys nothing directly. The card does.

Cash. Cash has never been an approved method. Paying cash for a winning ticket is a crime under O.C.G.A. § 16-12-35. The ban also reaches the gift card itself, as the next section explains.

The Lottery has also introduced a written warning form that "explicitly outlines the law, permitted products, and prohibited items."

Strict rules for gift cards

The gift card rules are set out in O.C.G.A. § 50-27-71.1(b):

- **Exact value.** Only the amount of the winning ticket may be placed on the card.
- **Loaded at the store.** The amount is placed on the card only at the licensed location, by the licensee, its employees, or a self-service gift card device at that location.
- **Used anywhere.** The card "may be used off the premises."
- **Never cash.** The card "shall not be exchanged for cash, change, or currency."
- **Full value.** Mike Parham, the Lottery's senior vice president for COAM, has said gift cards "must be redeemed for their full value." The entire amount of the winning ticket goes on the card.

No cash by any route. On Sept. 16, 2026, the Lottery wrote to COAM license holders that a COAM gift card "cannot be used to obtain cash in any manner, whether in whole or in part." The letter also states that a store may not give cash back. Attached was a Sept. 2, 2026 letter from Joe Kim, the Lottery's general counsel, addressing ATMs, cash apps and transfers to bank accounts.

"I cannot issue advice that would act as a safe harbor for COAM gift cards being exchanged for currency," it states.

What may come next. On Oct. 6, 2026, the Lottery posted proposed updates to its COAM rules on gacoam.com. They are drafts and are

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COAM calendar

UPCOMING

Jan. 20: Gross retail receipts for October, November and December are due. The gross retail receipts must be submitted electronically through the COAM website at **www.gacoam.com**. Failure to report on time may result in penalties.

MEETINGS & MORE

Jan. 20: COAM Advisory Board, Lottery headquarters, Atlanta

Feb. 4: GAMOA membership meeting, Crowne Plaza Atlanta Norcross

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Skill games

from Page 1

The machines began appearing in Pennsylvania in the mid-2010s, after a 2014 Beaver County court ruling found that one manufacturer's devices were games of skill rather than illegal gambling machines. By the late 2010s, they were fixtures in convenience stores, gas stations, bars and other small businesses across Philadelphia.

Players insert cash, spin digital reels and try to line up symbols to win money, much as they would on traditional slots. Manufacturers argued that an added puzzle element made the devices games of skill rather than chance, allowing them to operate for years outside casino regulations.

Pennsylvania's Independent Fiscal Office estimated in February 2026 that about 50,000 machines statewide drew $9.4 billion in annual wagers and retained roughly $2.35 billion after payouts. Those figures are estimates, not verified totals. Manufacturers, operators and host businesses shared the retained money, with no gambling-tax share going to the state or city.

Philadelphia City Council first passed restrictions in 2022. Councilmember Curtis Jones Jr. sought a tougher crackdown in 2023, but then-Mayor Jim Kenney pocket-vetoed the legislation.

In April 2024, Mayor Cherelle Parker signed another Jones-backed measure banning the machines in most convenience stores and gas stations. It allowed limited exceptions for certain businesses with liquor licenses and at least 30 seats, and imposed fines of $1,000 per machine, per day. A legal challenge blocked enforcement that December.

In Harrisburg, lawmakers debated regulation without reaching an agreement. State Sen. Gene Yaw and state Rep. Danilo Burgos proposed legalizing the machines in 2023 and taxing them at 16%, potentially generating hundreds of millions in state revenue.

Gov. Josh Shapiro proposed a 42% tax in 2024, then a 52% rate in 2025 and again in 2026. Lawmakers offered competing tax rates and licensing plans, but none became law.

The turning point came June 15, 2026, when the Pennsylvania Supreme Court ruled that the devices were legally slot machines. The justices gave lawmakers 120 days to act before enforcement began.

That deadline expired Oct. 13. State police began enforcement the next day, cutting off a source of income businesses such as Khan's had come to depend on.

"The proliferation of gambling machines meant the reduction of grocery items in neighborhood stores. What also occurred were incidents of robberies that were recorded in the Mayor's Nuisance Business report," said Jones to Billy Penn regarding why he pushed to restrict the machines.

Jones said he considered the impact on businesses but "would never put profits over people."

Business owners offered a different view of safety. Khan and others interviewed by Billy Penn said the machines brought customers into their stores, making employees feel safer because they were less often alone.

Gambling grows as store owners lose income

The loss of skill games comes as Pennsylvania's regulated gambling industry brings in record revenue. For store owners such as Khan, however, that broader growth does not replace the money once earned from machines in their businesses.

Americans wagered nearly $167 billion on legal sports betting in 2025, according to the American Gaming Association. Sportsbooks kept nearly $17 billion of that, a 23% increase from the previous year.

Pennsylvania collected nearly $239 million in sports betting taxes during the 2025-26 fiscal year, plus another $1.34 billion from online casino games. Altogether, regulated gambling generated more than $3 billion in state taxes and fees.

Skill games drew billions in wagers without paying comparable state gambling taxes. The industry pushed for legalization and licensing rather than a ban, while lawmakers spent years debating how much revenue the state should collect.

Republican gubernatorial candidate Stacy Garrity received at least $4.5 million in campaign contributions connected to the skill-games industry between Sept. 15 and Oct. 19, according to Spotlight PA. Garrity has supported legalizing and taxing the machines and appeared at an industry rally in Pittsburgh earlier this month. Shapiro has also received industry donations, including $50,000 from a skill-games PAC in June.

For businesses, gambling can be a source of income. For players, that income comes from money lost – a distinction at the heart of the debate over the machines.



COAM

from Page 4

not yet in force. Kim has said the changes would make clear that COAM gift cards cannot be used at ATMs.

"The statute says that the card cannot be exchanged for cash," he said.

The drafts include three provisions of note:

- **Gift cards and cash.** Proposed Rule 13.1.13(2): "No gift card, or any portion of the value thereon, awarded for successful play of COAMs may be exchanged for cash directly or indirectly, such as via ATMs and money services, whether at the location where the gift card was awarded or elsewhere."
- **Store cards.** Proposed Rule 13.1.16(2) would permit store cards that are "Unique to a location," "For use only at that licensed location," and "Only redeemable at the location in which the accumulated points are awarded by the COAM."
- **Debit cards.** Proposed Rule 13.1.16(3): "Debit cards, including the GLC's iHOPE Discover Debit Card, that are not store cards shall be considered cash for the purposes of this Rule and are not permissible."

Mandatory record keeping

You must keep records. It's not a choice. The requirement is written into the Lottery's rules, and it applies to both sides of every machine: the Master Licensee and the store.

Five years, plus the current year. Lottery Rule 13.1.14(11) requires each of them to "retain records of all its COAM transactions for no less than the last five full calendar years and current year to date." A request made on November 1, 2026, for example, reaches back to January 1, 2021.

Subject to audit. The same rule states that Master License Holders, Location Owners and Location Operators "are subject to audit by the GLC and its authorized agents, including the division of monies between the parties."

That division is set by the Lottery. Its Net Revenue and Commission report states: "On May 12, 2024, the following changes in revenue share were implemented on the Central Accounting System: The Location License share decreased from 45.0% to 43.5%. The Master License share decreased from 45.0% to 43.5%. The Georgia Lottery Corporation share increased from 10.0% to 13.0%."

The written agreement. Under Rule 13.1.10(1), no machine may be placed without a written agreement between the Master Licensee and the location. The agreement "shall be exclusive as between one bona fide coin operated amusement machine Master Licensee and one Location Owner or Location Operator per location." Rule 13.1.10(2) requires that "A copy of the written agreement shall be on file in the Master Licensee's and the Location Owner's and Location Operator's place of business and available for inspection."

Changes must be reported. Rule 13.1.14(22) requires Master Licensees and Location Owners to "notify the GLC of any change in their ownership, address information, phone number(s) and email address(es) within five (5) business days."

The 50 percent rule. Under O.C.G.A. § 50-27-84(b)(1), "No location owner or location operator shall derive more than 50 percent" of the store's quarterly gross retail receipts from Class B machines.

Quarterly reports. The same law requires the store to "prepare a quarterly verified report" of its gross retail receipts, and each Class B Master License holder files its own quarterly report, by location, of the gross and net receipts of the machines it maintains. Reports are filed electronically and are due "on the twentieth day of January, April, July, and October," each covering the quarter before.

Nine machines. Rule 13.1.13(4) states that, "Except as authorized by local ordinance, no Location Owner or Location Operator shall offer more than nine (9) Class B machines to the public for play in the same business location." The rule makes an exception for amusement or recreational establishments.

The weekly sweep. Each week, on the Location Sweep Date, usually a Wednesday, the Lottery collects the COAM funds it is owed from the store's COAM bank account. In an email to location licensees dated September 23, 2026, the COAM Division set out the consequences of a returned sweep. The machines and the lottery terminal may be switched off until the balance is paid in full, and inspectors may issue a citation. A location with a Financial Security Deposit on file faces a weekend suspension on the third returned sweep within 90 days, a seven-day suspension on the fourth, and a recommendation to end the license on the fifth. A location without a deposit faces immediate suspension on the third returned sweep within 90 days, until the balance is paid and a deposit is posted. If no deposit is posted within two weeks, the license ends.

Equipment stays on. The Lottery's procedures direct licensees to "ensure all equipment remains connected to the site controller and powered up at all times," and warn: "Failure to comply with these procedures may result in fines up to $50,000, suspension and/or revocation of the license."

Inspections at any time. Under Rule 13.1.10(4), Lottery agents "shall have access during the inspection to" all areas of the business and to all books, records, and supplies related to the machines. Under Rule 13.1.10(5), failure "to cooperate with all aspects of an inspection" is a violation in itself.

Distribution of responsibilities

Store Owners carry the day-to-day duties at the counter:

- Redeem winning tickets using only the four approved methods.
- Keep records of all COAM transactions for five full years plus the current year (Rule 13.1.14(11)).
- Stay within the 50 percent rule and file the quarterly report (O.C.G.A. § 50-27-84).
- Keep a copy of the written agreement with the Master Licensee on file (Rule 13.1.10(2)).
- Post the original Location License and a copy of the Master License (Rule 13.1.6).
- Post the Fraud, Abuse and Cash Payout tip-line sign near the machines (Rule 13.1.14(16)).
- Report ownership and contact changes within five business days (Rule 13.1.14(22)).

The law places the warning and civil penalty for an improper redemption on the "location owner or location operator."

Master Licensees must hold a license before any machine goes into play. Rule 13.1.5(1) states: "All Owners of COAMs must obtain a Master License prior to placing COAMs in operation." Their duties include:

- Keep records of all COAM transactions for five full years plus the current year (Rule 13.1.14(11)).
- File a quarterly verified report showing, for each location, the gross and net receipts of the Class B machines it maintains (O.C.G.A. § 50-27-84(c.1)).
- Keep a copy of the written agreement with each location on file (Rule 13.1.10(2)).
- Place a permit sticker on every machine (Rule 13.1.8) and a Play Responsibly decal on every Class B machine (Rule 13.1.14(17)).
- Report ownership and contact changes within five business days (Rule 13.1.14(22)).

Penalties and enforcement

Improper redemptions. The law provides "a warning for the first violation." After that come civil penalties "proportional to any amounts inappropriately redeemed."

Cash redemptions. Paying cash for a winning ticket is a misdemeanor "of a high and aggravated nature" under O.C.G.A. § 16-12-35.

License penalties. Lottery Rule 13.1.15(1) lists the penalties for violating the law or the rules. They include a fine against the COAM license holder, suspension or revocation of the COAM license, and seizure of the COAM "including any proceeds contained in the COAM."

Enforcement is active. For the July-through-September quarter, Andrew Pippen, compliance director of the Lottery's COAM Division, reported 2,847 inspections, 112 citations and 444 warnings, along with 11 enforcement actions involving agencies. The division also received about 500 community complaints during the quarter, including reports of cash payouts.

Pippen said warnings rose as inspectors worked with retailers on the new redemption options. "Because of the new redemption rules that are in law, we wanted to make sure we're out there speaking to the retailers," he said.

Final thought

The approved list now fits on one line: replays, Lottery products, or gift cards. Cash is not on it, in any form. Inspectors are in the field, and the Lottery may ask to see five years of records at any time.

For every store and every route, the rules are now clear. The businesses on the firmest footing are the ones that know those rules and can show their records when asked.

This article is for general education only and is not legal advice. Coam Tracker is a Georgia-based record-keeping application for COAM locations. Store owners use it to record each redemption, each gift card issued, and each day's machine totals. Coam Tracker also gives Master licensees their own portal to track field technicians, locations, machines, service visits, and license dates in one place. Learn more at **coamtracker.com**.


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Keep COAMs connected to ensure financial reporting

To ensure accurate reporting of financial data to the Central Accounting System, the Georgia Lottery Corporation (GLC) says it is imperative the Location License Holders (LLHs) ensure all equipment remains connected to the site controller and powered up at all times.

The GLC maintains a record of those LLHs that are repeat offenders of failing to ensure the continuous connectivity and operation of Class B COAMs.

Failure to comply with these procedures may result in fines up to $50,000, suspension and/or revocation of the license.

Proper procedure for the decommission of COAMs

The proper procedure to decommission coin-operated amusement machines (COAMs) can be found on the COAM Division website, www.gacoam.com. The COAM decommission procedure should be followed when there is:

- A change of master, change of ownership, or cancellation letter received by GLC;
- A COAM game board swapped out with a different game;
- A COAM malfunction.

To proceed with the decommissioning:

1. Call Intralot before disconnecting the COAMs from a location and removing those COAMs. The Master License Holder (MLH) needs to contact the Intralot Hotline at 877-261-6242 to properly decommission COAMs. The COAMs must be connected to the site controller at this time.
2. Intralot will let you know when the COAMs are decommissioned. The Intralot representative will perform steps on the Intralot system that prepares the COAMs for the decommission. Once the steps are complete, Intralot will notify the MLH the machines have been decommissioned.
3. Disconnect decommissioned COAMs from the site controller.

COIN OPERATED AMUSEMENT MACHINE LOCATION SWEEP AND MASTER PUSH CALENDAR

JULY-DEC 2026

ACCOUNTING WEEK START	ACCOUNTING WEEK END	LOCATION SWEEP DATE	MASTER PUSH DATE
28-Jun-26	04-Jul-26	08-Jul-26	14-Jul-26
05-Jul-26	11-Jul-26	15-Jul-26	21-Jul-26
12-Jul-26	18-Jul-26	22-Jul-26	28-Jul-26
19-Jul-26	25-Jul-26	29-Jul-26	04-Aug-26
26-Jul-26	01-Aug-26	05-Aug-26	11-Aug-26
02-Aug-26	08-Aug-26	12-Aug-26	18-Aug-26
09-Aug-26	15-Aug-26	19-Aug-26	25-Aug-26
16-Aug-26	22-Aug-26	26-Aug-26	01-Sep-26
23-Aug-26	29-Aug-26	02-Sep-26	09-Sep-26*
30-Aug-26	05-Sep-26	09-Sep-26	15-Sep-26
06-Sep-26	12-Sep-26	16-Sep-26	22-Sep-26
13-Sep-26	19-Sep-26	23-Sep-26	29-Sep-26
20-Sep-26	26-Sep-26	30-Sep-26	06-Oct-26
27-Sep-26	03-Oct-26	07-Oct-26	14-Oct-26*
04-Oct-26	10-Oct-26	14-Oct-26	20-Oct-26
11-Oct-26	17-Oct-26	21-Oct-26	27-Oct-26
18-Oct-26	24-Oct-26	28-Oct-26	03-Nov-26
25-Oct-26	31-Oct-26	04-Nov-26	10-Nov-26
01-Nov-26	07-Nov-26	12-Nov-26*	18-Nov-26*
08-Nov-26	14-Nov-26	18-Nov-26	24-Nov-26
15-Nov-26	21-Nov-26	25-Nov-26	02-Dec-26
22-Nov-26	28-Nov-26	02-Dec-26	08-Dec-26
29-Nov-26	05-Dec-26	09-Dec-26	15-Dec-26
06-Dec-26	12-Dec-26	16-Dec-26	22-Dec-26
13-Dec-26	19-Dec-26	23-Dec-26	30-Dec-26*
20-Dec-26	26-Dec-26	30-Dec-26	07-Jan-27*

*Indicates sweep or push date has been changed to accommodate holiday

Note: Holidays on a Thursday and Friday may delay the availability of the Location Period Accounting Report on the following Monday





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