



August 7, 2025

SPORTS BETTING INDUSTRY BULLETIN 15
RE: Clarification of Rule 3.1(3), Vendor Minor Licenses

The Division is providing this industry bulletin to give further guidance regarding licensing requirements of Vendor Minor Sports Betting Licenses, pursuant to Sports Betting Rule 3.1(3), 1 C.C.R. 207-2. An Industry bulletin cannot amend rules or statute; a bulletin can only clarify the agency's rules.

Per Rule 3.1(3), a Vendor Minor License is required for:

- A. Any person^[1] who is employed for, contracts with, or acts on behalf of an establishment licensed to operate sports betting, and is involved in the operation of sports betting, other than those activities specified under 30-301(1).
- B. A vendor minor license expires two years after the date of issuance but may be renewed upon the filing and approval of an application for renewal.

In the definition of vendor minor, the phrase “involved in the operation of sports betting” includes but is not limited to where a company has: access to personally identifiable information of consumers; access to wagering systems; or access to or otherwise supports financial transactions for a sports betting operation.

Please note that a licensee who contracts with a non-licensee to provide services that violate the Limited Gaming Act or applicable Rules and Regulations may face discipline for any action taken on behalf of the licensee.

If you have any questions or concerns, please do not hesitate to contact the Division's Sports Betting unit at dor_sportsbetting_submissions@state.co.us. Remember, timely renewal of your Colorado Gaming or Sports Betting License is crucial to maintaining your Sports Betting operations.

If you have an active Vendor Minor license, and you believe you fall outside of the scope of Rule 3.1(3) please contact dor_sportsbetting_submissions@state.co.us, to discuss the possible surrender of your license. Please note, the potential surrender of a Vendor Minor license does not include a refund of licensing or application fees. The Division is not responsible for determining whether the licensee's activities fall outside the scope of Rule 3.1(3) prior to or in the acceptance of any voluntary surrender.

[1] Note, “person” includes both natural persons and legal entities. § 44-30-103(24), C.R.S.