



COLORADO

**Department of
Regulatory Agencies**

Colorado Office of Policy, Research &
Regulatory Reform

2025 Sunset Review

Colorado Professional Boxing
Safety Act



October 15, 2025



COLORADO

Department of
Regulatory Agencies

Executive Director's Office

October 15, 2025

Members of the Colorado General Assembly
c/o the Office of Legislative Legal Services
State Capitol Building
Denver, Colorado 80203

Dear Members of the General Assembly:

The Colorado General Assembly established the sunset review process in 1976 as a way to analyze and evaluate regulatory programs and determine the least restrictive regulation consistent with the public interest. Pursuant to section 24-34-104(5)(a), Colorado Revised Statutes (C.R.S.), the Colorado Office of Policy, Research and Regulatory Reform (COPRRR) at the Department of Regulatory Agencies (DORA) undertakes a robust review process culminating in the release of multiple reports each year on October 15.

A national leader in regulatory reform, COPRRR takes the vision of their office, DORA and more broadly of our state government seriously. Specifically, COPRRR contributes to the strong economic landscape in Colorado by ensuring that we have thoughtful, efficient, and inclusive regulations that reduce barriers to entry into various professions and that open doors of opportunity for all Coloradans.

As part of this year's review, COPRRR has completed an evaluation of the Colorado Professional Boxing Safety Act. I am pleased to submit this written report, which will be the basis for COPRRR's oral testimony before the 2026 legislative committee of reference.

The report discusses the question of whether there is a need for the regulation provided under Article 110 of Title 12, C.R.S. The report also discusses the effectiveness of the Director of the Division of Professions and Occupations, the Director of the Office of Combative Sports and the Colorado Combative Sports Commission in carrying out the intent of the statutes and makes recommendations for statutory changes for the review and discussion of the General Assembly.

To learn more about the sunset review process, among COPRRR's other functions, visit coprrr.colorado.gov.

Sincerely,

Patty Salazar
Executive Director





Colorado Professional Boxing Safety Act

Background

What is regulated?

The Colorado Professional Boxing Safety Act (Act) creates the regulatory framework for combative sports in Colorado. Combative sports generally consist of physical activities involving offensive and defensive techniques between two opponents. They include a variety of disciplines or modalities, including boxing, kickboxing, Muay Thai, martial arts, mixed martial arts and bareknuckle fighting.

Why is it regulated?

The Act is intended to create an effective and efficient system of strict control that, at a minimum: protects the safety of participants and promotes the public trust and confidence in combative sports.

Who is regulated?

In fiscal year 23-24, 1,744 individuals were licensed under the Act, including 837 participants, 835 corners, 24 promoters and 48 officials. Additionally, 41 combative sports events received permits that same year.

How is it regulated?

While the Act is administered by the Director of the Division of Professions and Occupations, (Division Director), day-to-day operations are administered by the Director of the Office of Combative Sports (Office Director and Office, respectively). Additionally, the seven-member Colorado Combative Sports Commission (Commission) is tasked with promulgating such

rules as are necessary to regulate combative sports matches that take place in the state.

What does it cost?

In fiscal year 23-24, expenditures related to the Act amounted to \$85,629 and 0.25 full-time equivalent employees were dedicated to the administration of the Act.

What disciplinary activity is there?

In fiscal year 23-24, the Office received 14 complaints resulting in no disciplinary actions.

Key Recommendations

- Continue the Act for 11 years, until 2037.
- Direct the Office Director to gather safety data related to combative sports and direct the Commission to consider such data when adopting or amending rules.
- Change the name of the Act to “Colorado Combative Sports Safety Act,” authorize the Commission to identify in rule those combative sports to which the Act applies and clarify that a participant is one who engages in a combative sport regulated by the Commission.

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Background

Sunset Criteria

Enacted in 1976, Colorado's sunset law was the first of its kind in the United States. A sunset provision repeals all or part of a law after a specific date, unless the legislature affirmatively acts to extend it. During the sunset review process, the Colorado Office of Policy, Research and Regulatory Reform (COPRRR) within the Department of Regulatory Agencies (DORA) conducts a thorough evaluation of such programs based upon specific statutory criteria¹ and solicits diverse input from a broad spectrum of stakeholders including consumers, government agencies, public advocacy groups, and professional associations.

Sunset reviews are guided by statutory criteria and sunset reports are organized so that a reader may consider these criteria while reading. While not all criteria are applicable to all sunset reviews, the various sections of a sunset report generally call attention to the relevant criteria. For example,

- In order to address the first criterion and determine whether the program under review is necessary to protect the public, it is necessary to understand the details of the profession or industry at issue. The Profile section of a sunset report typically describes the profession or industry at issue and addresses the current environment, which may include economic data, to aid in this analysis.
- To address the second sunset criterion--whether conditions that led to the initial creation of the program have changed--the History of Regulation section of a sunset report explores any relevant changes that have occurred over time in the regulatory environment. The remainder of the Legal Framework section addresses the fifth sunset criterion by summarizing the organic statute and rules of the program, as well as relevant federal, state and local laws to aid in the exploration of whether the program's operations are impeded or enhanced by existing statutes or rules.
- The Program Description section of a sunset report addresses several of the sunset criteria, including those inquiring whether the agency operates in the public interest and whether its operations are impeded or enhanced by existing statutes, rules, procedures and practices; whether the agency or the agency's board performs efficiently and effectively and whether the board, if applicable, represents the public interest.
- The Analysis and Recommendations section of a sunset report, while generally applying multiple criteria, is specifically designed in response to the fourteenth criterion, which asks whether administrative or statutory changes are necessary to improve agency operations to enhance the public interest.

¹ Criteria may be found at § 24-34-104, C.R.S.

These are but a few examples of how the various sections of a sunset report provide the information and, where appropriate, analysis required by the sunset criteria. Just as not all criteria are applicable to every sunset review, not all criteria are specifically highlighted as they are applied throughout a sunset review. While not necessarily exhaustive, the table below indicates where these criteria are applied in this sunset report.

Table 1
Application of Sunset Criteria

Sunset Criteria	Where Applied
(I) Whether regulation or program administration by the agency is necessary to protect the public health, safety, and welfare.	• Profile of Combative Sports • History of Regulation • Recommendations 1, 2, 4 and 6
(II) Whether the conditions that led to the initial creation of the program have changed and whether other conditions have arisen that would warrant more, less, or the same degree of governmental oversight.	• History of Regulation • Recommendations 1 and 3
(III) If the program is necessary, whether the existing statutes and regulations establish the least restrictive form of governmental oversight consistent with the public interest, considering other available regulatory mechanisms.	• Legal Summary
(IV) If the program is necessary, whether agency rules enhance the public interest and are within the scope of legislative intent.	• Legal Summary
(V) Whether the agency operates in the public interest and whether its operation is impeded or enhanced by existing statutes, rules, procedures, and practices and any other circumstances, including budgetary, resource, and personnel matters.	• Legal Summary • Program Description and Administration • Recommendations 3 and 8
(VI) Whether an analysis of agency operations indicates that the agency or the agency's board or commission performs its statutory duties efficiently and effectively.	• Program Description and Administration • Recommendation 8
(VII) Whether the composition of the agency's board or commission adequately represents the public interest and whether the agency encourages public participation in its decisions rather than participation only by the people it regulates.	• Legal Summary • Program Description and Administration • Recommendations 4 and 5
(VIII) Whether regulatory oversight can be achieved through a director model.	• Complaints
(IX) The economic impact of the program and, if national economic information is not available, whether the agency stimulates or restricts competition.	• Profile of Combative Sports • Recommendation 1

Sunset Criteria	Where Applied
(X) If reviewing a regulatory program, whether complaint, investigation, and disciplinary procedures adequately protect the public and whether final dispositions of complaints are in the public interest or self-serving to the profession or regulated entity.	• Complaints • Disciplinary Activity • Recommendation 7
(XI) If reviewing a regulatory program, whether the scope of practice of the regulated occupation contributes to the optimum use of personnel.	• Licensing
(XII) Whether entry requirements encourage equity, diversity, and inclusivity.	• Licensing
(XIII) If reviewing a regulatory program, whether the agency, through its licensing, certification, or registration process, imposes any sanctions or disqualifications on applicants based on past criminal history and, if so, whether the sanctions or disqualifications serve public safety or commercial or consumer protection interests. To assist in considering this factor, the analysis prepared pursuant to subsection (5)(a) of this section must include data on the number of licenses, certifications, or registrations that the agency denied based on the applicant's criminal history, the number of conditional licenses, certifications, or registrations issued based upon the applicant's criminal history, and the number of licenses, certifications, or registrations revoked or suspended based on an individual's criminal conduct. For each set of data, the analysis must include the criminal offenses that led to the sanction or disqualification.	• Collateral Consequences
(XIV) Whether administrative and statutory changes are necessary to improve agency operations to enhance the public interest.	• Recommendations 1 through 8

Sunset Process

Regulatory programs scheduled for sunset review receive a comprehensive analysis. The review includes a thorough dialogue with agency officials, representatives of the regulated profession and other stakeholders. Anyone can submit input on any upcoming sunrise or sunset review on COPRRR's website at coprrr.colorado.gov.

The functions of the Director of the Division of Professions and Occupations (Director and Division, respectively), the Office of Combative Sports (Office Director and Office, respectively) and the Colorado Combative Sports Commission (Commission), as enumerated in Article 110 of Title 12, Colorado Revised Statutes (C.R.S.), shall terminate on September 1, 2026, unless continued by the General Assembly. During the year prior to this date, it is the duty of COPRRR to conduct an analysis and evaluation of the Colorado Professional Boxing Safety Act (State Act), the Director, the Office Director and the Commission pursuant to section 24-34-104, C.R.S.

The purpose of this review is to determine whether the currently prescribed regulation should be continued and to evaluate the performance of the Director, the Office Director and the Commission. During this review, the Director, the Office Director and the Commission must demonstrate that the program serves the public interest. COPRRR's findings and recommendations are submitted via this report to the Office of Legislative Legal Services.

Methodology

As part of this review, COPRRR staff interviewed Division and Office staff, licensees, officials with national professional associations and regulators in other states; attended Commission meetings; observed a combative sporting event and reviewed complaint files and Colorado statutes and rules.

The major contacts made during this review include, but are not limited to:

- Association of Boxing Commissions and Combative Sports
- Association of Ringside Physicians
- Colorado Attorney General's Office
- Colorado Combative Sports Commission members
- Colorado Office of Economic Development and International Trade
- Denver Sports Commission
- Division of Professions and Occupations

Profile of Combative Sports

In a sunset review, the Colorado Office of Policy, Research and Regulatory Reform (COPRRR) is guided by the sunset criteria located in section 24-34-104(6)(b), C.R.S. The first criterion asks whether regulation or program administration by the agency is necessary to protect the public health, safety, and welfare.

To understand the need for regulation, it is first necessary to recognize what combative sports are, who they involve and how they are run.

The world of combative sports is vast and evolving, with roots in many cultures throughout the world. In ancient times, various modalities of combative sports served practical purposes as forms of military training, as well as entertainment and displays of strength.

In general, all forms of combative sports consist of physical activities involving offensive and defensive techniques between two opponents. They include a variety of disciplines or modalities, including boxing, judo, karate, taekwondo and many others. Each has its own rules, techniques and philosophies. Regardless, they share an emphasis on discipline, respect for one's opponent and the pursuit of personal growth.²

This sunset report focuses on those combative sports that are regulated under the Colorado Professional Boxing Safety Act (State Act). These include:

- Boxing - A modality in which participants wear padded gloves and that focuses on punching one's opponent.
- Kickboxing and Muay Thai - Modalities involving punching, kicking, kneeing and elbowing one's opponent.
- Mixed Marital Arts and Martial Arts - Modalities that utilize a combination of techniques derived from boxing, kickboxing and other martial arts.
- Bareknuckle Fighting - A modality that is similar to boxing except that participants do not wear gloves, though they typically wrap their hands for protection.

In all modalities, points are awarded for various strikes and may end in a knockout.

An event typically consists of multiple bouts or matches, which may involve multiple modalities. A bout consists of multiple rounds. Depending on the modality of the bout and whether it is a professional or elimination bout, it may consist of three or five rounds, each of which lasts two or three minutes, with a one-minute break between rounds.

² Teachy. *Summary of Combat Sports*. Retrieved June 17, 2025, from www.teachy.app/en/summaries/high-school/12-grade/physical-education-en/combat-sports-or-traditional-summary-8a4a9

Bouts may be conducted on either a professional basis, in which a purse is awarded, or as an “elimination” bout, in which no purse is awarded. The results of all Colorado-regulated events are reported to various national organizations where participant records are tracked.

Colorado-regulated events are conducted under the supervision of the Colorado Office of Combative Sports (Office) and the Colorado Combative Sports Commission (Commission), located in the Department of Regulatory Agencies’ (DORA’s) Division of Professions and Occupations (Division).

Pursuant to the State Act, the Office licenses:

- Participants,
- Officials,
- Corner People, and
- Promoters.

Participants are the fighters in the various combative sporting events, and they are assisted during the event by Corner People. A Corner Person may provide the Participant with a stool upon which to sit between rounds, water to drink, a towel, a spit bucket or any combination thereof.

Officials represent the Office and Commission at the event and work to ensure the event runs according to the terms of the State Act and the rules promulgated thereunder. They include:

- A referee, who is in the ring with the Participants;
- Judges, usually three, who sit ringside and keep score;
- A timekeeper, who rings the bell to begin and end a round and monitors the time of each round and the break between rounds;
- Inspectors, who typically monitor the Participant dressing rooms to ensure that proper equipment (such as gloves, pads and hand wraps) is utilized; and
- A Chief Inspector, who is responsible for the entire event.

Promoters are typically business enterprises that organize the event by securing the venue, arranging the bouts, arranging for security and emergency medical personnel and ensuring that everyone is appropriately compensated.

In addition, a physician licensed by the Colorado Medical Board must be present at each event to conduct pre- and post-bout physical examinations and to render medical care to Participants as necessary.

The ninth sunset criterion questions the economic impact of the program and, if national economic information is not available, whether the agency stimulates or

restricts competition. One way this may be accomplished is to review the projected salary and growth of the profession.

It is difficult to ascertain the economic impact of combative sports on an individual level. Professional Participants may be paid as little as a few hundred dollars per bout up to several tens of millions of dollars. Participants in elimination bouts receive no monetary compensation.

Although Officials represent the Office and the Commission, they are not typically employees of the State. Rather, they are selected by the Director of the Office to work at a particular event and are paid by the Promoter according to a pay scale established in Commission rules. Their pay varies depending on the role of the Official at a particular event (i.e., judge versus chief inspector), gross ticket sales of the event and the area of the state in which the event is held. These scales range from a low of \$300 per event to a high of \$795 per event.

Larger events can also have a significant economic impact on the region in which they are held. For example, in September 2024, Denver hosted an international event that generated an estimated \$18 million in direct and indirect economic impact, with more than \$15 million of that coming from out-of-state individuals and organizations.³

³ Metro Denver EDC and Denver Metro Chamber of Commerce. *Economic Impact of ONE 168*. Retrieved April 8, 2025, from www.metrodenver.org/sites/default/files/2025-01/ONEFC%20Economic%20Impact_121024.pdf

Legal Framework

History of Regulation

In a sunset review, the Colorado Office of Policy, Research and Regulatory Reform (COPRRR) is guided by the sunset criteria located in section 24-34-104(6)(b), Colorado Revised Statutes (C.R.S.). The first and second sunset criteria question:

Whether regulation or program administration by the agency is necessary to protect the public health, safety, and welfare; and

Whether the conditions that led to the initial creation of the program have changed and whether other conditions have arisen that would warrant more, less or the same degree of governmental oversight.

One way that COPRRR addresses this is by examining why the program was established and how it has evolved over time.

Regulation of boxing began in 1927, when the Colorado General Assembly created a three-member State Boxing Commission, which had jurisdiction over all professional and amateur matches. In 1947, the General Assembly renamed the State Boxing Commission the Colorado State Athletic Commission, which continued to regulate the sport until the General Assembly discontinued regulation following a 1977 sunset review.

The Colorado Office of Policy, Research and Regulatory Reform (COPRRR) conducted sunrise reviews exploring whether to regulate boxing in 1988 and 1991. Each of these recommended against regulation, finding that it was not necessary to protect the public.

In 1996, the U.S. Congress passed the Professional Boxing Safety Act (Federal Act), which established a basic regulatory framework and safety measures for the sport. The Federal Act also stipulated that any state failing to create a boxing commission by July 1, 1997, would be compelled to have a boxing commission from another state oversee boxing events occurring within its borders. Accordingly, following the passage of the Federal Act, the Colorado Boxing Alliance—a boxing industry group affiliated with the national Association of Boxing Commissions—coordinated the oversight of boxing events in Colorado by bringing teams of out-of-state regulators to Colorado.

COPRRR conducted another sunrise review of boxing in 1998. While that review concluded that regulation was not necessary to protect the public, it recognized the awkward situation created by the Federal Act and recognized the need to protect the sport's participants.

In 2000, the Colorado General Assembly determined that it was in Colorado's best interest to create its own entity to oversee boxing and kickboxing and passed House Bill 1183, known as the Colorado Professional Boxing Safety Act (State Act). The State Act created the Colorado Office of Boxing (Office), headed by an Office Director (Office Director), and reconstituted the State Boxing Commission (Commission) as a seven-member advisory board. Both the Office and Commission were housed in the Department of Regulatory Agencies' Division of Professions and Occupations (Division). The State Act directed the Commission to promulgate rules addressing licensing requirements for boxers, promoters, judges, and referees; insurance and bonding requirements; guidelines for participant compensation, contracts, and financial arrangements; and other areas.

In 2002, the General Assembly passed House Bill 1078, which established grounds for discipline and disciplinary procedures for people licensed under the State Act and directed the Commission to promulgate rules establishing licensing requirements for boxing inspectors and seconds.

In 2004, the General Assembly passed Senate Bill 24, which standardized statutory language among the regulatory programs within the Division. Among other changes, this bill authorized the issuance of letters of admonition and further defined disciplinary and license renewal procedures.

The General Assembly authorized the issuance of cease and desist orders and confidential letters of concern in 2006, when it passed House Bill 1264.

In 2009, the Commission underwent a sunset review; subsequently, the General Assembly passed House Bill 10-1245. Notable changes in the bill included adding to the State Act specific language addressing mixed martial arts and clarifying that anyone wishing to participate in, judge, referee, promote, or second a boxing match must be licensed under the State Act.

COPRRR conducted another sunset review in 2016, resulting in Senate Bill 17-148 (Senate Bill 148). This bill, among other things, implemented recommendations to continue the State Act until 2026, clarified the roles of the Office Director and the Division Director, extended the terms of Commission members to four years and authorized the Division Director to discipline a licensee for medical or administrative reasons.

Senate Bill 148 also added martial arts to the sports regulated under the State Act, and, in recognizing that the State Act regulated more than boxing, changed the names of the Commission and Office to "Colorado Combative Sports Commission" and "Office of Combative Sports" respectively.

Finally, in 2000, the federal government amended the Federal Act by enacting the Muhammed Ali Boxing Reform Act to, among other things, protect boxers from

exploitation, reform the integrity of sanctioning organizations and require public disclosures to state boxing commissions.⁴

Legal Summary

The third, fourth, fifth and seventh sunset criteria question:

Whether the existing statutes and regulations establish the least restrictive form of governmental oversight consistent with the public interest, considering other available regulatory mechanisms;

Whether agency rules enhance the public interest and are within the scope of legislative intent;

Whether the agency operates in the public interest and whether its operation is impeded or enhanced by existing statutes, rules, procedures, and practices and any other circumstances, including budgetary, resource, and personnel matters; and

Whether the composition of the agency's board or commission adequately represents the public interest and whether the agency encourages public participation in its decisions rather than participation only by the people it regulates.

A summary of current statutes and rules is necessary to understand whether regulation is set at the appropriate level and whether the current laws are impeding or enhancing the agency's ability to operate in the public interest.

Federal Law

The federal Professional Boxing Safety Act of 1996, as amended by the Muhammad Ali Boxing Reform Act (Federal Act), is generally recognized as applying to professional boxing only, and not to other combative sports.

The purpose of the Federal Act is to improve and expand the safety and welfare of professional boxers and to assist state boxing commissions in providing proper industry oversight.⁵ Towards this end, the Federal Act requires that each boxer participating in a professional boxing match be examined by a physician, that an ambulance or medical personnel with appropriate equipment be present on site, that a physician be present at ringside and that each boxer have health insurance to cover any injuries sustained during the match.⁶

⁴ Melissa Bell, "Time to Give Boxers a Fighting Chance: The Muhammed Ali Boxing Reform Act," *DePaul Journal of Art, Technology & Intellectual Property Law* (2000), p. 12.

⁵ 15 U.S.C. § 6302.

⁶ 15 U.S.C. § 6304.

In general, each boxing commission is required to establish procedures to:⁷

- Evaluate the professional records and physician certification of each boxer,
- Ensure that no boxer participates in a boxing match while under suspension from any boxing commission,
- Review a suspension, and
- Revoke a suspension.

State boxing commissions are encouraged to follow the guidelines of the Association of Boxing Commissions (ABC) regarding minimum contractual provisions⁸ and the Federal Act contains provisions protecting boxers from coercive contracts.⁹

Additionally, ABC is required to develop, and state boxing commissions and sanctioning bodies are encouraged to follow, guidelines for the objective and consistent ratings of professional boxers.¹⁰

Sanctioning bodies are required to disclose to the state boxing commission responsible for regulating a particular match:¹¹

- All charges, fees and costs the sanctioning body will assess the boxers participating in a particular match;
- All payments, benefits and fees the organization will receive for its affiliation with the event; and
- Any additional information the state boxing commission may require.

Promoters, in turn, are required to disclose to the state boxing commission responsible for regulating a professional match:¹²

- Copies of any written agreements between the promoter and the boxers participating in a particular match;
- All fees, charges and expenses that the promoter will assess on the boxers participating in a particular match;
- All payments, gifts or benefits the promoter is providing to any sanctioning body; and
- Any reduction in a boxer's purse that is contrary to a previous agreement between the promoter and the boxer.

Similarly, promoters are required to disclose to the boxers in a particular match:¹³

⁷ 15 U.S.C. § 6306(a)

⁸ 15 U.S.C. § 6307a.

⁹ 15 U.S.C. § 6307b.

¹⁰ 15 U.S.C. § 6307c(a).

¹¹ 15 U.S.C. § 6307d.

¹² 15 U.S.C. § 6307e(a).

¹³ 15 U.S.C. § 6307e(b).

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- The amount of any consideration that a promoter has contracted to receive from the match;
 - All fees, charges and expenses that the promoter will assess on the boxer; and
 - Any reduction in a boxer's purse that is contrary to a previous agreement between the promoter and the boxer.

Each boxer must register with the boxing commission of the state in which the boxer resides.¹⁴ Similarly, any person who arranges, promotes or organizes a boxing match must be approved by the state boxing commission responsible for regulating the particular match.¹⁵

The Federal Act also addresses conflicts of interest for certain individuals. In general:¹⁶

- No member or employee of a state boxing commission may receive any compensation from any person who sanctions, arranges or promotes professional boxing matches or who has a financial interest in an active boxer;
- No promoter may have a financial interest in the management of a boxer;
- No manager may have a financial interest in the promotion of a boxer or be employed by or receive compensation from a promoter outside of amounts received as a result of the manager's contract with the boxer; and
- No sanctioning officer or employee of a sanctioning body may receive any compensation, gift or benefit from a promoter, boxer or manager.

Violations of the Federal Act may be enjoined by the U.S. Attorney General and upon conviction of a knowing violation, may result in up to one year imprisonment, a fine of up to \$100,000 depending on the nature of the violation and the individual involved, or both imprisonment and a fine. State attorneys general may seek similar remedies and any boxer who suffers economic injuries as a result of such a violation may file suit in the appropriate state or federal court.¹⁷

Finally, no boxing match can be held in a state that does not have a boxing commission, unless it is supervised by a boxing commission from another state.¹⁸ Further, states may adopt or enforce provisions that supplement or are more stringent than, but that are also consistent with the Federal Act.¹⁹

Colorado Law

The Colorado Professional Boxing Safety Act (State Act) was enacted, in part, because there was no state boxing commission in Colorado at the time of its enactment, thus

¹⁴ 15 U.S.C. § 6305(a).

¹⁵ 15 U.S.C. § 6307h.

¹⁶ 15 U.S.C. § 6308.

¹⁷ 15 U.S.C. § 6309.

¹⁸ 15 U.S.C. § 6303(a).

¹⁹ 15 U.S.C. § 6313.

requiring any professional boxing matches held in the state to be supervised by the boxing commission of another state.²⁰

The State Act is intended to create a system of “effective and efficient system of strict control” that, at a minimum: protects the safety of participants and promotes the public trust and confidence in professional boxing.²¹ Towards this end, the State Act authorizes the promulgation of rules that regulate “all persons, practices, and associations that relate to the operation of live professional boxing events, performances, or contests held in Colorado.”²²

The State Act defines several types of combative sports:

- Boxing - fighting, striking, forcing an opponent to submit, or disabling an opponent, including the disciplines of martial arts, kickboxing and mixed martial arts.²³
- Martial arts - any of several arts of combat or self-defense that are widely practiced as sport.²⁴
- Kickboxing - martial arts fighting techniques that use the hands and feet.²⁵
- Mixed Martial Arts - the combined techniques of boxing and martial arts, such as grappling, kicking and striking, including the use of full, unrestrained physical force.²⁶
- Toughperson Fighting - any activity that involves physical contact between two or more individuals engaging in combative skills using hands, feet or body.²⁷

Further, a participant is “a person who engages in a match as a boxing contestant.”²⁸ Thus, despite its name, the State Act applies not only to boxing, but to a wider array of combative sports.

Toughperson fighting is expressly prohibited in the state.²⁹ Anyone who participates in, promotes or advertises such an event commits a Class 2 misdemeanor,³⁰ which is punishable by 120 days imprisonment, a fine of up to \$750, or both.³¹

The Commission is a type 2 entity³² created within the Office to regulate matches in Colorado.³³ The Commission consists of seven members, five of whom are voting

²⁰ § 12-110-102(1), C.R.S.

²¹ § 12-110-102(2), C.R.S.

²² § 12-110-102(3), C.R.S.

²³ § 12-110-104(2), C.R.S.

²⁴ § 12-110-104(7), C.R.S.

²⁵ § 12-110-104(6), C.R.S.

²⁶ § 12-110-104(9), C.R.S.

²⁷ § 12-110-104(16), C.R.S.

²⁸ § 12-110-104(12), C.R.S.

²⁹ § 12-110-112(1), C.R.S.

³⁰ §§ 12-110-112(1) and (2), C.R.S.

³¹ § 18-1.3-501(1)(a.5), C.R.S.

³² § 12-110-105, C.R.S.

³³ § 12-110-106(1), C.R.S.

members and two of whom are advisory members, appointed by the Governor, Speaker of the House of Representatives (Speaker) and President of the Senate (President) as follows:³⁴

- Three voting members, appointed by the Governor;
- One voting member and one advisory member who is a licensed physician, appointed by the Speaker; and
- One voting member and one advisory member who is a licensed physician, appointed by the President.

The nonvoting advisory members are required to provide the Commission with advice on “matters concerning the health and physical condition of boxers and health issues relating to the conduct of matches.”³⁵

All members of the Commission must be residents of the state, be of good character and must not have been convicted of any felony or match-related offense.³⁶ Commissioners may be removed for misfeasance, malfeasance, willful neglect of duty or any other cause.³⁷

Commissioners serve four-year terms³⁸ and select one member to serve as chair.³⁹ The Commission must meet at least annually and such meetings are open to the public.⁴⁰ While Commissioners may be reimbursed for expenses incurred in the performance of their duties, they do not receive compensation for service as such.⁴¹

The Commission must promulgate rules that are “necessary for the regulation of the conduct, promotion, and performance of live boxing matches in this state” and that are consistent with the State and Federal Acts. Such rules must include:⁴²

- Requirements for issuing licenses and permits to boxers, seconds, inspectors, promoters, judges and referees;
- Regulation of ticket sales;
- Physical requirements for participants, including classifications for weight and skill;
- Provisions for supervision of contests and exhibitions by referees and physicians;
- Requirements for insurance covering participants;
- Bonding requirements for promoters;
- Guidelines addressing the compensation of licensees, contracts between participants and promoters and reporting fraud;

³⁴ § 12-110-106(2)(a)(I), (II), (III) and (IV)(A), C.R.S.

³⁵ § 12-110-106(2)(a)(IV)(B), C.R.S.

³⁶ § 12-110-106(2)(a), C.R.S.

³⁷ § 12-110-106(2)(c), C.R.S.

³⁸ § 12-110-106(2)(b), C.R.S.

³⁹ § 12-110-106(2)(c), C.R.S.

⁴⁰ § 12-110-106(3), C.R.S.

⁴¹ § 12-110-107(2), C.R.S.

⁴² § 12-110-107(1), C.R.S.

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- Prohibition of dishonest, unethical and injurious practices;
 - Responsibilities of participants; and
 - Regulation of facilities.

Additionally, the Commission's rules must include procedures authorizing the Division Director to deny or suspend a participant license for non-disciplinary reasons, such as medical or administrative reasons, including those enumerated in the Federal Act.⁴³

The Office is a type 2 entity within the Division.⁴⁴

The Office Director is appointed by the Division Director⁴⁵ and must:⁴⁶

- Be of good character,
- Not have been convicted of any felony or match-related offense, and
- Not be engaged in any other profession or occupation that presents a conflict of interest.

The Office Director is required to, among other things:⁴⁷

- Direct and supervise the activities of the Commission;
- Supervise and administer the operation of matches; and
- Advise and make recommendations to the Division Director regarding the Division Director's functions.

The Division Director is required to, among other things:⁴⁸

- Attend the Commission's meetings, or appoint a designee to do so;
- Advise and recommend rules and other procedures to the Commission as the Division Director deems necessary and advisable to improve the conduct of boxing; and
- Enforce the State Act, including investigating allegations of any violations thereof.

Anyone who participates in, officiates, judges, referees, promotes or seconds a professional boxing match must be licensed under the State Act.⁴⁹ The Division Director is authorized to collect fees as are necessary to implement the State Act.⁵⁰

The Division Director may impose discipline on any licensee, or license applicant, who:⁵¹

⁴³ § 12-110-107(1)(l), C.R.S.

⁴⁴ § 12-110-105, C.R.S.

⁴⁵ § 12-110-110(1), C.R.S.

⁴⁶ § 12-110-110(2), C.R.S.

⁴⁷ § 12-110-110(3)(a), C.R.S.

⁴⁸ § 12-110-110(3)(b), C.R.S.

⁴⁹ § 12-110-108, C.R.S.

⁵⁰ § 12-110-114, C.R.S.

⁵¹ § 12-110-111(1), C.R.S.

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- Violates an order of the Commission or Division Director, any provision of the State Act or Article 20 of Title 12, C.R.S., or any rule of the Commission;
 - Fails to meet the requirements of the State Act or rules of the Commission;
 - Is convicted of or has entered a plea of *nolo contendere* or guilty to a felony;
 - Has a substance use disorder, or excessively uses or abuses alcohol, habit-forming drugs or controlled substances if the use, disorder or dependency endangers other licenses;
 - Has been disciplined in another jurisdiction;
 - Provides false information in any application or attempts to obtain a license by fraud, deception, misrepresentation or concealment; or
 - Is guilty of conduct that:
 - Is detrimental to a contest or exhibition, including unsportsmanlike conduct before, during or after a contest or exhibition;
 - Results in injury or creates an unreasonable risk of harm to a person; or
 - Fails to comply with a limitation, restriction or condition that the Division Director or any other state regulatory authority places on the licensee or applicant.

If the Division Director finds that any of the above occurred, the State Act implies that the Division Director may deny, suspend, revoke or place on probation the relevant licensee or applicant.⁵² In addition, the Division Director may issue a confidential letter of concern if the conduct does not warrant formal action, but indicates possible errant conduct that could lead to serious consequences if not corrected.⁵³ Finally, the Division Director may issue a letter of admonition if the conduct does not warrant formal action but should not be dismissed as being without merit. Such letters must be sent by certified mail.⁵⁴

The Division Director may issue a cease and desist order⁵⁵ if the Division Director finds that a licensee's actions represent an imminent threat to the public, or if the person has acted without a license.⁵⁶

Additionally, the Division Director may impose a fine for violation of the State Act of up to \$5,000 for a single violation or \$25,000 for multiple violations.⁵⁷ Any fines collected are credited to the state's General Fund.⁵⁸

Finally, anyone who engages in an act regulated by the State Act without a license commits a class 2 misdemeanor,⁵⁹ which is punishable by 120 days imprisonment, a fine of up to \$750, or both.⁶⁰

⁵² § 12-110-111(2)(a), C.R.S.

⁵³ § 12-110-111(2)(b)(III), C.R.S.

⁵⁴ § 12-110-111(2)(b)(IV), C.R.S.

⁵⁵ § 12-110-111(3), C.R.S.

⁵⁶ § 12-20-405(1)(a), C.R.S.

⁵⁷ § 12-110-115(1), C.R.S.

⁵⁸ § 12-20-404(6)(a), C.R.S.

⁵⁹ § 12-110-115(2), C.R.S.

⁶⁰ § 18-1.3-501(1)(a.5), C.R.S.

The Commission's rules cover a variety of topics, including:⁶¹

- Rule 1.4 - General Rules
- Rule 1.5 - Requirements for Participants in All Bouts
- Rule 1.6 - General Requirements
- Rule 1.7 - Declaratory Orders
- Rule 1.8 - Requirements for Boxing Participants
- Rule 1.9 - Requirements for Professional Kickboxing and Muay Thai Participants
- Rule 1.10 - Requirements for Professional Mixed Martial Arts and Martial Arts Participants
- Rule 1.11 - Requirements for Bareknuckle Participants
- Rule 1.12 - Requirements for Corners
- Rule 1.13 - Requirement for Promoters
- Rule 1.14 - Requirements for Contract, Financial Arrangements and Reporting Fraud
- Rule 1.15 - Personnel, Facility and Equipment Requirements
- Rule 1.16 - Tickets and Sales Reporting Requirements
- Rule 1.17 - Requirements for Elimination Bouts
- Rule 1.18 - Requirements for Officials

⁶¹ See 4 CCR § 740-1: Combative Sports Rules and Regulations.

Program Description and Administration

In a sunset review, the Colorado Office of Policy, Research and Regulatory Reform (COPRRR) is guided by sunset criteria located in section 24-34-104(6)(b), Colorado Revised Statutes (C.R.S.). The fifth, sixth and seventh sunset criteria question:

Whether the agency operates in the public interest and whether its operation is impeded or enhanced by existing statutes, rules, procedures, and practices and any other circumstances, including budgetary, resource, and personnel matters;

Whether an analysis of agency operations indicates that the agency or the agency's board or commission performs its statutory duties efficiently and effectively; and

Whether the composition of the agency's board or commission adequately represents the public interest and whether the agency encourages public participation in its decisions rather than participation only by the people it regulates.

In part, COPRRR utilizes this section of the report to evaluate the agency according to these criteria.

The Colorado Professional Boxing Safety Act (State Act) regulates combative sports in the state. It is administered by the Director of the Division of Professions and Occupations (Division Director and Division, respectively), located within the Department of Regulatory Agencies (DORA). However day-to-day operations are administered by the Director of the Office of Combative Sports (Office Director and Office, respectively).

The Colorado Combative Sports Commission (Commission) is tasked with promulgating such rules as are necessary to regulate combative sports matches that take place in the state. The Commission, which is a type 2 entity, consists of seven members, five of whom are voting members and two of whom are advisory members, appointed by the Governor, Speaker of the House of Representatives (Speaker) and President of the Senate (President) as follows:⁶²

- Three voting members, appointed by the Governor;
- One voting member and one advisory member who is a licensed physician, appointed by the Speaker; and
- One voting member and one advisory member who is a licensed physician, appointed by the President.

⁶² §§ 12-110-106(2)(a)(I), (II), (III) and (IV)(A), C.R.S.

The nonvoting advisory members are required to provide the Commission with advice on “matters concerning the health and physical condition of boxers and health issues relating to the conduct of matches.”⁶³

The Commission typically meets four times per year, and meetings are held in both virtual and hybrid formats. While all meetings are open to the public, members of the public rarely attend.

Table 2 illustrates, for the five fiscal years indicated, total program expenditures and the number of full-time equivalent (FTE) employees dedicated to the program.

Table 2
Program Expenditures and FTE

Fiscal Year	Total Program Expenditure	FTE
19-20	\$133,911.73	0.51
20-21	\$120,140.18	0.75
21-22	\$191,324.35	0.25
22-23	\$73,337.13	0.25
23-24	\$85,628.57	0.25

Fluctuations in expenditures can generally be attributed to fluctuations in staffing and the number of combative sports events held in a given year.

The FTE reflected in the table do not include employees in the centralized offices of the Division that provide management, licensing, administrative, technical, and investigative support to the Program. However, the cost of those FTE is reflected in the total program expenditures.

In fiscal year 24-25, 0.25 FTE were allocated to the program, consisting of the Office Director (Program Management III). The Office Director is responsible for the overall management of the Office, including complaint and application resolution, stakeholder engagement, Commission member recruitment and outreach and education. The Office Director is also responsible for overseeing combative sports events, which includes assigning officials to work a particular event and processing the results of combative sports events.

The Office is cash funded by licensing fees paid by various individuals including participants, corners, promoters and officials. Table 3 illustrates the fees assessed to various license types for the fiscal years indicated.

⁶³ § 12-110-106(2)(a)(IV)(B), C.R.S.

Table 3
License Fees

License & Fee Type	FY 19-20	FY 20-21	FY 21-22	FY 22-23	FY 23-24
Corner - Initial	\$50	\$50	\$50	\$100	\$40
Corner - Renewal	\$55	\$55	\$55	\$100	\$40
Official - Initial	\$100	\$100	\$100	\$200	\$80
Official - Renewal	\$35	\$35	\$35	\$70	\$28
Participant - Initial	\$50	\$50	\$50	\$100	\$40
Participant - Renewal	\$55	\$55	\$55	\$100	\$40
Promoter - Initial	\$250	\$250	\$250	\$500	\$200
Promoter - Renewal	\$125	\$125	\$125	\$250	\$100

All license types renew on an annual basis. Fees generally remained stable until fiscal year 22-23, at which time they nearly doubled for all license types. The fee increase can be attributed to the Office's efforts to erase a cash fund deficit. In fiscal year 23-24, fees returned to close to what they had been prior to fiscal year 22-23.

Additionally, each combative sports event must obtain a valid permit from the Office. The fee to obtain a permit was \$600 for all five fiscal years evaluated for this sunset review.

Licensing

The eleventh and twelfth sunset criteria question whether the scope of practice of the regulated occupation contributes to the optimum use of personnel and whether entry requirements encourage equity, diversity and inclusivity.

In part, COPRRR utilizes this section of the report to evaluate the program according to these criteria.

The State Act authorizes four types of licenses: participant, corner, promoter and official.

Table 4 illustrates, for the five fiscal years indicated, the total number of new and renewal licenses issued.

Table 4
Licensing Information - All License Types

Fiscal Year	Initial	Renewal	Total
19-20	330	214	1,113
20-21	54	93	239
21-22	634	233	1,164
22-23	841	277	1,710
23-24	671	435	1,744

Participants, corners and promoters typically only seek licensure in Colorado if they are going to participate in an event in the state. Thus, renewals are generally low, since a licensee may seek to renew only if they are going to participate in a subsequent event in the state. Thus, fluctuations from year to year can be attributed to the fluctuations in the number of combative sports events held in Colorado.

Participants are individuals who participate in a combative sport, which the Commission defines as “boxing, kickboxing, mixed martial arts, and martial arts.”⁶⁴

The State Act defines boxing as “fighting, striking, forcing an opponent to submit, or disabling an opponent, including the disciplines of kickboxing, mixed martial arts, and martial arts.”⁶⁵

The State Act defines kickboxing as “engaging in martial arts fighting techniques using the hands and feet, the object of which is to win by a decision, knockout, or technical knockout.”⁶⁶

The Commission’s rules define mixed martial arts as

Any physical contact bout between two or more individuals who attempt to outscore, knock out, or gain submission of the opponent by using any combination of boxing, kickboxing, choking techniques, or martial art.⁶⁷

The Commission’s rules define martial arts as including aikido, judo, jujitsu, karate, kendo, kung fu, sumo wrestling, t’ ai chi, tae kwon do, wrestling and Muay Thai.⁶⁸

Thus, despite its name, the State Act regulates more than traditional boxing.

⁶⁴ 4 CCR § 740-1-1.4(A)(3). Combative Sports Rules and Regulations.

⁶⁵ § 12-110-104(2), C.R.S.

⁶⁶ § 12-110-104(6), C.R.S.

⁶⁷ 4 CCR § 740-1-1.4(A)(15). Combative Sports Rules and Regulations.

⁶⁸ 4 CCR § 740-1-1.4(A)(14). Combative Sports Rules and Regulations.

To obtain a license as a participant, an individual must be at least 18 years old and pay the applicable fee.⁶⁹ Boxers must also be registered with the recognized boxing federal registry and mixed martial arts participants must hold a National Identification Card.⁷⁰

Table 5 illustrates, for the fiscal years indicated, the number of initial and renewal participant licenses.

Table 5
Participant Licenses

Fiscal Year	Initial	Renewal	Total
19-20	200	107	599
20-21	37	40	130
21-22	324	84	580
22-23	410	94	813
23-24	346	165	837

Again, participants typically only seek licensure in Colorado if they are going to participate in an event in the state. Thus, fluctuations from year to year can be attributed to the fluctuations in the number of combative sports events held in Colorado.

Neither the State Act nor the Commission's rules explicitly define what a corner is, but the Commission's rules indicate that corners generally act as "seconds" and must possess the equipment necessary to act as such. This equipment includes water bottles as well as "water buckets, gauze and tape for hand wraps, spit buckets, scissors, towels, petroleum jelly, enswell, q-tips, mouthpieces and cut solutions."⁷¹

To act as a corner, one must possess a license as such. To obtain a corner license, an individual must complete an application, pay the applicable fee and be at least 18 years old.⁷²

Table 6 illustrates the number of new and renewal corner licenses during the five fiscal years indicated.

⁶⁹ 4 CCR §§ 740-1-1.5(A), (B) and (C). Combative Sports Rules and Regulations.

⁷⁰ 4 CCR § 740-1-1.5(D)(1). Combative Sports Rules and Regulations.

⁷¹ 4 CCR § 740-1-1.12(D). Combative Sports Rules and Regulations.

⁷² 4 CCR §§ 740-1-1.12(A), (B) and (C). Combative Sports Rules and Regulations.

Table 6
Corner Licenses

Fiscal Year	Initial	Renewal	Total
19-20	126	77	464
20-21	9	24	68
21-22	288	116	520
22-23	398	143	810
23-24	318	227	835

Corners, like participants, typically only seek licensure in Colorado if they are going to participate in an event in the state. Thus, fluctuations from year to year can be attributed to the fluctuations in the number of combative sports events held in Colorado.

The Commission's rules simply define a promoter as "[a]ny person, association, corporation, or organization licensed to promote events."⁷³ Regardless, promoters must obtain a license from the Division Director to act as such and are responsible for ensuring that all participants and corners are properly licensed.⁷⁴ They must also obtain a permit for each event.⁷⁵

To obtain a license as a promoter, the applicant must pay the applicable fee and be at least 18 years old.⁷⁶

Table 7 illustrates the number of initial and renewal promoter licenses issued by the Division Director for the five fiscal years indicated.

⁷³ 4 CCR § 740-1-1.4(A)(18). Combative Sports Rules and Regulations.

⁷⁴ 4 CCR § 740-1-1.13(A). Combative Sports Rules and Regulations.

⁷⁵ 4 CCR § 740-1-1.13(D)(1)(a). Combative Sports Rules and Regulations.

⁷⁶ 4 CCR §§ 740-1-1.13(B) and (C). Combative Sports Rules and Regulations.

Table 7
Promoter Licenses

Fiscal Year	Initial	Renewal	Total
19-20	2	9	18
20-21	4	9	16
21-22	9	11	29
22-23	7	13	31
23-24	2	22	24

Promoters, like participants and corners, typically only seek licensure in Colorado if they are going to promote an event in the state. Thus, fluctuations from year to year can be attributed to the fluctuations in the number of combative sports events held in Colorado.

Applications for an event permit must include proof of required insurance, proof of having a bond and a proposed bout card. Office staff then verifies the licenses of those involved and assigns the officials who will work the event.

Table 8 illustrates, for the years indicated, the number of permits issued for combative sports events.

Table 8
Event Permits

Fiscal Year	Permits Issued
19-20	29
20-21	1
21-22	49
22-23	41
23-34	41

The number of permits fluctuates from year to year and, according to staff, the COVID-19 pandemic played a significant role in some of that fluctuation as in-person events were minimal during the first two years of the reporting period.

The Commission's rules define an official as:

Any person who performs an official function during the supervision of a contest or exhibition. This includes referees, judges, timekeepers and inspectors.⁷⁷

All officials must be licensed by the Division Director,⁷⁸ and during an event, serve under the direct control and supervision of the Office Director.⁷⁹ To obtain a license as an official, an individual must submit an application and pay the appropriate fee.⁸⁰

In addition, the Commission's rules enumerate the required qualifications for referees, judges and inspectors.

To become a referee, a candidate must possess four years of amateur experience as a referee at the highest level or one year of professional experience as a referee from a state athletic commission or a tribal commission. Candidates must also read and understand the laws and rules governing combative sports in Colorado and the rules of the various sanctioning bodies.⁸¹

To become a judge, a candidate must possess three years of amateur experience as a judge at the highest level or one year of professional experience as a judge from a state athletic commission or a tribal commission.⁸²

There are three categories of inspector: timekeepers, tally judges and knock down judges. To become an inspector, a candidate must possess three years of amateur experience as an inspector, timekeeper, tally judge or knockdown judge or possess one year of professional experience from a state athletic commission or a tribal commission.⁸³

Importantly, an official license authorizes the individual to act in whichever capacity they are qualified. As a result, the Office maintains data pertaining to officials only, not the individual types of official.

Table 9 illustrates, for the fiscal years indicated, the number of officials licensed by the Division Director.

⁷⁷ 4 CCR § 740-1-1.4(A)(13). Combative Sports Rules and Regulations.

⁷⁸ 4 CCR § 740-1-1.18(B). Combative Sports Rules and Regulations.

⁷⁹ 4 CCR § 740-1-1.18(A)(1). Combative Sports Rules and Regulations.

⁸⁰ 4 CCR § 740-1-1.18(B). Combative Sports Rules and Regulations.

⁸¹ 4 CCR § 740-1-1.18(B)(1). Combative Sports Rules and Regulations.

⁸² 4 CCR § 740-1-1.18(B)(2). Combative Sports Rules and Regulations.

⁸³ 4 CCR § 740-1-1.18(B)(3). Combative Sports Rules and Regulations.

Table 9
Officials Licenses

Fiscal Year	Initial	Renewal	Total
19-20	2	21	32
20-21	0	20	25
21-22	13	22	35
22-23	26	27	56
23-24	5	21	48

Unlike participants, corners and promoters who may seek a license for a single event, officials are typically Colorado residents who work multiple events throughout the state throughout the year. As a result, officials tend to renew their licenses at a greater rate than the other license types.

Complaints

The eighth and tenth sunset criteria require COPRRR to examine whether regulatory oversight can be achieved through a director model, and whether complaint, investigation and disciplinary procedures adequately protect the public and whether final dispositions of complaints are in the public interest or self-serving to the profession or regulated entity.

In part, COPRRR utilizes this section of the report to evaluate the program according to these criteria.

While the Office may receive complaints from a variety of sources, most tend to come from other licensees who observe conduct at an event or are the result of disclosures on license applications.

Table 10 illustrates, for the fiscal years indicated, the number and types of complaints received. The “Nature of Complaint” is indicated by the individual filing the complaint and, in the end, may not accurately represent the conduct that actually occurred.

Table 10
Complaint Information

Nature of Complaints	FY 19-20	FY 20-21	FY 21-22	FY 22-23	FY 23-24
Criminal Conviction	10	1	0	1	3
Drug or Alcohol Abuse	0	0	1	0	2
Substandard Practice	0	0	3	1	0
Unlicensed Practice	0	1	1	0	2
Unprofessional Conduct	1	0	4	3	7
Total	11	2	9	5	14

There is no readily apparent reason for the fluctuation in the number complaints.

As Table 10 indicates, the Office received a total of 41 complaints during the five-year period examined for this sunset review.

Of the 15 complaints alleging criminal convictions, 12 related to participants and 3 related to corners.

Of the three complaints alleging drug or alcohol abuse, two related to participants and one related to a corner.

Of the four complaints alleging substandard practice, two related to participants, one related to an official and one related to a promoter. In the context of combative sports, substandard practice is difficult to define, but it can include things such as a participant failing to bring a mouthpiece to an event.

Of the four complaints alleging unlicensed practice, two related to promoters who had previously been licensed and failed to renew before promoting subsequent events and two related to unlicensed individuals who advertised events.

Of the 15 complaints alleging unprofessional conduct, 9 related to participants, 3 related to promoters, 2 related to officials and 1 related to a corner. Unprofessional conduct may include making threats against officials, failing to pay fees in a timely manner or engaging in disruptive behavior at an event.

As these data indicate, the majority of complaints (58.5 percent) were filed against participants.

Disciplinary Activity

The tenth sunset criterion requires COPRRR to examine whether complaint, investigation and disciplinary procedures adequately protect the public and whether final dispositions of complaints are in the public interest or self-serving to the profession or regulated entity.

In part, COPRRR utilizes this section of the report to evaluate the program according to this criterion.

If the Office receives a complaint that demonstrates a violation of the State Act, Federal Act or the Commission's rules, the Division Director can take disciplinary action against the licensee. Table 11 illustrates, for the fiscal years indicated, the total number and types of final actions taken.

Table 11
Final Agency Actions

Type of Action	FY 19-20	FY 20-21	FY 21-22	FY 22-23	FY 23-24
Revocations / Voluntary Surrender	0	0	0	1	0
Combined w/ Other Case	0	0	0	2	0
Stipulation	3	0	0	0	0
License Denied	0	4	0	0	0
Total Disciplinary Actions	3	4	0	3	0
Dismiss	6	4	5	4	8
Letter of Concern	1	0	0	0	1
Total Dismissals	7	4	5	4	9

As the data in Table 11 indicate, only 10 of the 41 (24.4 percent) complaints reported in Table 10 resulted in disciplinary action.

The single revocation was against a promoter.

The two cases that were "combined with other cases" both involved a single promoter, so they were combined into a single case.

Of the three stipulations, two involved participants and one involved a corner.

The four cases in which a license was denied involved two participants and two corners.

Although the State Act authorizes the Division Director to impose fines as a form of discipline, none were assessed during the five years examined for this sunset review.

Finally, Table 12 illustrates, for the five fiscal years indicated, the average amount of time it took to close a case, as represented from the time a complaint is filed until such time as the final agency action is entered.

Table 12
Average Time to Closure

Fiscal Year	Number of Days
19-20	133
20-21	145
21-22	94
22-23	260
23-24	15

Fluctuations in the average time to closure can generally be attributed to the Office clearing out backlogs and complaints that required input from the Attorney General's Office.

In general, however, the Division has been focusing on closing cases in a more timely manner, as is demonstrated by the sharp decrease in fiscal year 23-24.

Collateral Consequences - Criminal Convictions

The thirteenth sunset criterion requires COPRRR to examine whether the agency, through its licensing, certification or registration process, imposes any sanctions or disqualifications on applicants based on past criminal history and, if so, whether the sanctions or disqualifications serve public safety or commercial or consumer protection interests.

COPRRR utilizes this section of the report to evaluate the program according to this criterion.

Section 12-110-111(1)(c), C.R.S., authorizes the Division Director to take disciplinary action against a licensee or applicant who has been convicted of or entered a plea of *nolo contendere* or guilty to a felony.

During the five-year period examined for this sunset review, the Division Director did not impose any sanctions or disqualifications upon any licensee due to criminal history.

Analysis and Recommendations

The final sunset criterion questions whether administrative and statutory changes are necessary to improve agency operations to enhance the public interest. The recommendations that follow are offered in consideration of this criterion, in general, and any criteria specifically referenced in those recommendations.

Recommendation 1 – Continue the Colorado Professional Boxing Safety Act for 11 years, until 2037.

The Colorado Professional Boxing Safety Act (State Act) creates the Office of Combative Sports (Office) and the Combative Sports Commission (Commission) as Type 2 entities in the Division of Professions and Occupations (Division),⁸⁴ and it provides for the licensing and regulation of combative sports participants and various other industry participants. In passing the State Act, the General Assembly found that doing so was “in the best interests of the residents of Colorado, professional boxing participants, and the future of the sport of boxing in Colorado.” Further, the General Assembly found that regulation is necessary to “[p]rotect the safety of the participants; and [p]romote the public trust and confidence in the conduct of professional boxing.”⁸⁵

The first sunset criterion asks whether regulation is necessary to protect the public health, safety and welfare. When discussing combative sports, it is reasonable to ask this question as it pertains to both participants and the ticket-buying public.

Participant safety can be broken down into two categories: physical and financial. Combative sports, by their very nature, involve violent physical contact with participants punching and kicking one another, depending on the particular sport involved. The Commission’s rules, as mandated by the State Act, serve to protect the physical safety of participants by requiring that a licensed physician attend each match and by ensuring that participants are evenly matched, utilize appropriate safety equipment and follow the rules for their particular sport.

Thus, there can be no question that the State Act serves to protect the physical safety of participants.

The State Act and Commission rules also address, in general terms, guidelines for contracts and financial agreements between participants and promoters and requirements for insurance covering participants in case they are injured and the bonding of promoters to ensure contractual obligations are fulfilled.

Thus, the State Act and Commission rules serve to protect the financial safety of participants.

⁸⁴ §§ 12-110-105 and -106, C.R.S.

⁸⁵ § 12-110-102(2), C.R.S.

What is less obvious is how the State Act or Commission rules protect the public, as in those purchasing tickets to combative sports events. The State Act and Commission rules address public safety by requiring physical barriers between the audience and the combative sports participants to ensure that the public does not venture too close to the event where they could be injured by flying bodily fluids or participants falling out of the ring. Additionally, the State Act and Commission rules mandate the presence of security personnel at each regulated match to ensure that overly enthusiastic audience members do not themselves physically assault one another.

Therefore, it is reasonable to conclude that the State Act and the Commission are necessary to protect the health, safety and welfare of the public and should be continued.

Additionally, the second sunset criterion asks whether the conditions that led to initial regulation have changed. In passing the State Act, the General Assembly recognized that since Colorado had no boxing commission at the time, any professional boxing match held in the state had to be supervised by another state's boxing commission, using that state's safety provisions.⁸⁶

Colorado implemented the State Act to ensure that Colorado laws and rules, and not those of another state, would govern and protect combative sports events in Colorado. If the State Act were to sunset, professional combative sports events in Colorado would once again be dependent on the laws and rules of other states. In other words, if the State Act were to sunset, Colorado would find itself in the same situation and with the same problems as when regulation was initially instituted. Thus, continuation is warranted.

Finally, the ninth sunset criterion inquires as to the economic impact of regulation. Large combative sports events can have a significant economic impact on the region in which they are held. For example, in September 2024, Denver hosted an international event that generated an estimated \$18 million in direct and indirect economic impact, with more than \$15 million of that coming from out-of-state individuals and organizations.⁸⁷

While this was a single event, others have occurred in the past and may be less likely to occur in the future if there is no State Act or Commission and such events rely on the regulators of other states to ensure that they happen. Thus, the State Act has a positive economic impact on the state and should be continued.

As such, some maintain that the State, and in particular the Commission or the Division, should play a more active role in promoting the state to the national and international combative sports communities in an effort to bring more such events to Colorado. While the economic impact of such events is attractive, requiring the regulator to promote

⁸⁶ § 12-110-102(1), C.R.S.

⁸⁷ Metro Denver EDC and Denver Metro Chamber of Commerce. *Economic Impact of ONE 168*. Retrieved April 8, 2025, from www.metrodenver.org/sites/default/files/2025-01/ONEFC%20Economic%20Impact_121024.pdf

the growth of the industry it purports to regulate is fraught with perils, particularly potential conflicts of interest.

The Commission and Division regulate combative sports to ensure the health and safety of participants and the public, not to generate revenue for the state. If such were to become the case, the regulator could easily find itself in the untenable position of having to discipline a licensee it recruited to the state in the first place, or worse, it could overlook certain regulatory requirements in order to obtain the economic benefit such an event might provide.

Thus, such efforts should be resisted. However, there is nothing to prevent the business community from assuming the mantle of promoting the state as a location for such events. Indeed, such a task is more appropriately performed by the business community, as opposed to the State.

Finally, it is worth noting that concurrently with this sunset review, the Division also underwent a sunset review. Recommendations in the sunset report of the Division will likely impact the administration of the State Act, as those recommendations will have Division-wide impact. Such recommendations were made in the sunset report of the Division, as opposed to individual programmatic reports, to ensure consistency and cohesion in policy implementation across the Division.

For all these reasons, the State Act, and along with it the Office and the Commission, should be continued for 11 years, until 2037. Although this sunset report contains several recommendations that might argue in favor of a shorter continuation period, it also builds in flexibility for the Commission to address the changing landscape of combative sports, thereby justifying a longer continuation period.

Recommendation 2 – Direct the Office Director to gather safety data related to combative sports and Direct the Commission to consider such data when amending or adopting rules.

Recommendation 1 of this sunset report recognizes that regulation of combative sports is necessary to protect the health and safety of participants. Toward this end, the Division gathers data from each combative sporting event, including data on the:

- Type of event,
- Participants' approved weights and any changes in weight between weigh-in and the day of the event,
- Participants' gender,
- Number of rounds that actually occurred,
- Judges scores, and
- Results of the event.

All of this can help to identify various trends across events, types of events and individual judges and participants.

A statutory mandate to collect such data and to use it in rulemaking will help to ensure that future Commissions and others involved in rulemaking will continue to consider the health and safety of participants while promulgating rules.

The first sunset criterion asks whether regulation is necessary to protect the health, safety and welfare of the public. Continuing to gather, analyze and use safety-related data during future rulemaking proceedings will help to ensure that the health and safety of participants remains the focus of regulation.

Therefore, the General Assembly should direct the Office Director to gather safety data related to combative sports and direct the Commission to consider such data when amending or adopting rules.

Recommendation 3 — Change the name of the State Act to “Colorado Combative Sports Safety Act,” authorize the Commission to identify, in rule, those combative sports to which the State Act applies and clarify that a participant is one who engages in a combative sport regulated by the Commission.

When the General Assembly passed the State Act in 2000, boxing and kickboxing were the dominant combative sports and were, therefore, specifically addressed in the State Act. In fact, the only combative sport identified in the title of the State Act itself is professional boxing.

However, since 2000, numerous other combative sports have grown in popularity and come within the jurisdiction of the Commission, including mixed martial arts and Muy Thai.

The only combative sports defined in the State Act are boxing,⁸⁸ kickboxing, martial arts and mixed martial arts. Boxing is defined as:

fighting, striking, forcing an opponent to submit, or disabling an opponent, including the disciplines of kickboxing, mixed martial arts, and martial arts.⁸⁹

Kickboxing is defined as “engaging in martial arts fighting techniques using the hands and feet, the object of which is to win by a decision, knockout, or technical knockout.”⁹⁰

⁸⁸ § 12-110-104(2), C.R.S.

⁸⁹ § 12-110-104(2), C.R.S.

⁹⁰ § 12-110-104(6), C.R.S.

Martial arts are defined as “any of several arts of combat or self-defense that are widely practiced as a sport.”⁹¹

Mixed martial arts are defined as “the combined techniques of boxing and martial arts disciplines such as grappling, kicking, and striking, including the use of full, unrestrained physical force.”⁹²

Finally, a “match,” over which the State Act has jurisdiction, is defined as

a professional boxing contest or exhibition, the object of which is to win by a decision, knockout, or technical knockout and includes an event, engagement, sparing or practice session, show, or program where the public is admitted and there is intended to be physical contact.⁹³

It is by piecing together these various definitions that combative sports such as Muay Thai, which is not specifically addressed in the State Act, fall within the jurisdiction of the State Act and Commission rules.

Similarly, the State Act defines a boxer as “an individual who participates in a boxing match,”⁹⁴ and it defines a participant as “a person who engages in a match as a boxing contestant.”⁹⁵ Thus, it is necessary to follow the same chain of definitions discussed above to conclude that individuals who are not traditional boxers are also regulated under the State Act.

To clarify who is regulated under the State Act, it would be reasonable to repeal references and definitions that focus on boxing only and instead define a participant as one who engages in a combative sport regulated by the Commission. In doing so, the General Assembly should also update references throughout the State Act to be consistent with this approach.

The second sunset criterion asks whether conditions that led to initial regulation have changed. Today, the Act and Commission regulate much more than professional boxing, so conditions have changed and they warrant statutory clarification.

The fifth sunset criterion asks, among other things, whether agency operations are impeded by existing statutes. Although the Office and the Commission have successfully asserted jurisdiction over combative sports not specifically enumerated in the State Act, the State Act could be clearer by specifying that it applies to combative sports identified by the Commission in rule.

⁹¹ § 12-110-104(7), C.R.S.

⁹² § 12-110-104(9), C.R.S.

⁹³ § 12-110-104(8), C.R.S.

⁹⁴ § 12-110-104(1), C.R.S.

⁹⁵ § 12-110-104(12), C.R.S.

Clarification may also serve to protect the public and, more directly, combative sports participants by clearly alerting them that the State Act applies to more than professional boxing and boxers, as the name and definitions now imply.

For all these reasons, the General Assembly should rename the State Act the “Colorado Professional Combative Sports Safety Act,” authorize the Commission to identify, by rule, those sports that fall within the jurisdiction of the State Act and Commission rules and clarify that a participant is one who engages in a combative sport regulated by the Commission. Doing so will help to identify and clarify that the State Act encompasses more than just boxing and it will enable the Commission to assert its jurisdiction over combative sports, and their participants, as they evolve and grow in popularity.

Recommendation 4 – Elevate the physician members of the Commission to voting members.

The Commission consists of five voting members and two nonvoting advisory members. All must be residents of Colorado, be of good moral character and not have been convicted of any felony or combative sports-related offenses.⁹⁶

There are no additional qualifications for the five voting members. However, the two nonvoting members must be licensed physicians, and they are required to

advise the Commission on matters concerning the health and physical conditions of boxers and health issues relating to the conduct of matches. The nonvoting members may prepare and submit to the Commission for its consideration and approval any rules that in their judgement will safeguard the physical welfare of the participants engage in boxing.⁹⁷

As noted in Recommendation 1 of this sunset report, one of the main reasons combative sports are regulated in Colorado is to ensure participant safety. Yet the two members of the Commission most qualified to perform this task, and who are specifically directed to consider such matters and make recommendations to the Commission on them, have no vote on the Commission.

There appears to be no valid public policy reason as to why the two physicians on the Commission are advisory only and are unable to vote.

The first sunset criterion asks whether regulation serves to protect the public health, safety and welfare, and the seventh criterion asks, among other things, whether the board adequately represents the public interest.

⁹⁶ § 12-110-106(2)(a), C.R.S.

⁹⁷ § 12-110-106(2)(IV), C.R.S.

Recommendation 1 concludes that regulation is necessary, yet the two members of the Commission best suited to address participant safety are not able to vote on such issues. Thus, their status as nonvoting advisory members does not protect participant safety as much as it could. Therefore, it is reasonable to conclude that the Commission, as it is currently constituted, does not adequately represent the public interest.

For all these reasons, the General Assembly should elevate the two nonvoting physician members of the Commission to full Commission members with voting rights equal to their non-physician counterparts.

The two current physician members of the Commission are highly regarded and respected. So, this recommendation should not be interpreted as disparaging the five voting members of the Commission. It simply highlights a hole in the regulatory framework.

Recommendation 5 – Specify that the physician members of the Commission hold licenses issued by the Colorado Medical Board and have experience or training in emergency medicine, sports medicine or combative sports.

The Commission consists of five voting members and two nonvoting advisory members.⁹⁸ The two nonvoting members must be licensed physicians, and they are required to

advise the Commission on matters concerning the health and physical conditions of boxers and health issues relating to the conduct of matches. The nonvoting members may prepare and submit to the Commission for its consideration and approval any rules that in their judgement will safeguard the physical welfare of the participants engage in boxing.⁹⁹

There are no other provisions in the State Act relating to the physician members of the Commission. There is no requirement that they be licensed in Colorado and there is no requirement that they have any experience or training in a relevant specialty such as emergency medicine, sports medicine or combative sports.

The seventh sunset criterion asks, among other things, whether the composition of the board or commission adequately represents the public interest.

Recommendation 1 of this sunset report concludes that regulation is necessary to protect the public health, safety and welfare, thereby serving the public interest. However, the composition of the Board could further advance the public interest in at least two ways.

⁹⁸ § 12-110-106(2)(a), C.R.S.

⁹⁹ § 12-110-106(2)(IV), C.R.S.

First, most practice acts that require board or commission members to hold professional licenses require those licenses to be issued by the State of Colorado. This makes sense from the standpoint that such individuals are appointed to serve on a body of the State.

Second, combative sports is a unique activity where participants physically assault one another, and the physicians who practice in this area have specialized knowledge and training. While most physicians focus on injury avoidance, those working in combative sports must decide, through pre-fight physicals and ring-side observations, who is qualified to take damage and how much they can take. If a physician lacks combative sports experience, how can they advise the Commission on combative sports safety issues?

Not surprisingly, private certification is available, through the Association of Ringside Physicians (ARP). Although no specific training is required to take and pass ARP's examination, ARP offers an 18-hour course that examinees are encouraged to complete prior to taking the examination.

ARP certification is highlighted here to illustrate that combative sports is a specialized area of practice. Since there are only a handful of physicians in Colorado who hold the certification, requiring it as a condition of service on the Commission is impractical, and not justified.

However, requiring the Commission's physician members to have some experience in emergency medicine, sports medicine or combative sports will help to enhance participant safety.

For all these reasons, the General Assembly should require that the Commission's physician members hold licenses issued by the Colorado Medical Board and have experience or training in emergency medicine, sports medicine or combative sports.

To be sure, the two current physician members of the Commission are highly regarded and respected and both have extensive experience in combative sports medicine. So, this recommendation should not be interpreted as disparaging them in any way. It is offered simply to ensure that future Commission members are as highly qualified as the current two.

Recommendation 6 – Eliminate potential conflicts of interest among promoters, managers and matchmakers.

The federal Professional Boxing Safety Act of 1996, as amended (Federal Act), addresses conflicts of interest among promoters (and by extension their matchmakers) and managers by making it unlawful for

- (A) A promoter to have a direct or indirect financial interest in the management of a boxer; or (B) a manager (i) to have a direct or indirect

financial interest in the promotion of a boxer; or (ii) to be employed by or receive compensation or other benefits from a promoter except for amounts received as consideration under the manager's contract with the boxer.¹⁰⁰

This helps to ensure that managers and promoters (and by extension, the promoter's matchmakers) do not collude to defraud a participant or to improperly match participants.

Importantly, the Federal Act applies to professional boxing only. This conflict of interest does not apply to other combative sports.

The first sunset criterion asks whether regulation is necessary to protect the public health, safety and welfare.

Recommendation 1 of this sunset report concludes the regulation is necessary to protect the financial welfare of participants. As the Federal Act's protections serve this purpose but are limited to boxers only, they should be incorporated into the State Act.

For all these reasons, the General Assembly should adopt the Federal Act's conflict of interest provisions and define the terms "manager" and "matchmaker" to be consistent with those in the Federal Act.

Recommendation 7 – Include in the grounds for discipline, failure to respond to the allegations of a complaint within the length of time specified in the Division Director's letter.

When the Office receives a complaint against a licensee, staff sends the complaint to the licensee, thus enabling them to respond to the allegations. However, in at least one case in 2025, a licensee failed to respond to the allegations and the Division Director issued a letter of admonition.

Currently, there is no statutory basis that requires a licensee to provide a timely response to the allegations, which may slow down disciplinary proceedings since a response is often required before the Division Director can take any action. These delays may place the public at risk when complaints are related to serious allegations, and the respondent may be able to continue to operate while the Office awaits a response.

Two types of letters are typically sent by the Division Director to inform a licensee that a complaint has been filed against them: either a 30-day letter or, in critical circumstances in which the allegation involves public safety, a 10-day letter. Each letter clearly identifies the time frame (either 30 days or 10 days) within which a

¹⁰⁰ 15 U.S.C. § 6308(b)(1)

licensee is required to respond, as well as additional information regarding the allegations.

The tenth and fourteenth sunset criteria ask,

Whether complaint, investigation, and disciplinary procedures adequately protect the public and whether final dispositions of complaints are in the public interest or self-serving to the profession or regulated entity; and

Whether administrative and statutory changes are necessary to improve agency operations to enhance the public interest.

By adding failure to respond to a complaint as a violation of the State Act, a response not received within the timeframe specified would allow the Division Director to take action to prevent potential public harm through the initiation of formal disciplinary proceedings when required.

Therefore, the General Assembly should include in the grounds for discipline, failure to respond to the allegations of a complaint within the length of time specified in the Division Director's letter.

Recommendation 8 – Repeal the requirement that letters of admonition be sent by certified mail.

Section 12-110-111(2)(b)(IV), C.R.S., requires the Office to send a letter of admonition (LOA) to a licensee via certified mail. Certified mail is a service offered by the U.S. Postal Service, and its purpose is to provide delivery confirmation. For example, when the Office sends an LOA to a licensee via certified mail, the Office receives confirmation that the letter was delivered. However, a certified letter does not guarantee the letter was reviewed by the recipient. Sending a letter via certified mail is more costly than sending a letter via first class priority mail.

The fifth sunset criterion questions, in part, whether the agency's operation is impeded or enhanced by existing statutes, rules, and procedures.

The sixth sunset criterion questions whether the agency performs its statutory duties efficiently and effectively.

LOAs are the only form of discipline that the State Act requires to be sent via certified mail. This process is inconsistent with other practice acts in Colorado, creates an unnecessary administrative burden and is more costly than readily available alternatives.

Therefore, the General Assembly should repeal the requirement that the Division Director send an LOA via certified mail. Doing so removes an unnecessary requirement that is both more costly for the Division Director and inconsistent with other practice acts.