

Date of Hearing: March 8, 2023

ASSEMBLY COMMITTEE ON GOVERNMENTAL ORGANIZATION

Miguel Santiago, Chair

AB 341 (Ramos) – As Introduced January 30, 2023

SUBJECT: Gambling: local moratorium

SUMMARY: Reinstates a gambling moratorium until January 1, 2043, related to the expansion of cardroom gaming and the issuance of new gambling licenses in the state, except as provided in the bill. Specifically, this bill:

- 1) Creates a prohibition (moratorium) until January 1, 2043, that in addition to any other limitation on the expansion of gambling, as defined, the California Gambling Control Commission (CGCC/commission) shall not issue a gambling license for a gambling establishment that was not licensed to operate on December 31, 1999, unless an application to operate that establishment was on file with the California Department of Justice Bureau of Gambling Control (DOJ or Bureau) prior to September 1, 2000, as specified.
- 2) Provides that an application for a gambling license for a gambling establishment that was not licensed to operate on December 31, 2022, that is “pending” before the CGCC as of January 1, 2024, shall not be approved by the commission.
- 3) States an application for a gambling license for a gambling establishment that was not licensed to operate on December 31, 2022, and that was “approved” between December 31, 2022, and January 1, 2024, shall be invalid.
- 4) Provides until January 1, 2043, a governing body or the electors of a city, county, or city and county that has not authorized legal gambling within its boundaries prior to January 1, 1996, shall not authorize legal gambling, as defined. An ordinance in effect on January 1, 1996, that authorizes legal gambling within a city, county, or city and county shall not be amended to expand gambling in that jurisdiction beyond that permitted on January 1, 1996, as specified.
- 5) Authorizes a city, county, or city and county to amend its ordinance to increase the number of gambling tables that may be operated in a gambling establishment that operates 20 or fewer tables, by up to 2 additional tables the first year after the ordinance takes effect, and up to 2 additional tables every 4 years thereafter, not to exceed 10 additional tables above the number of tables operated at the gambling establishment on January 1, 2023, as specified.
- 6) States that an ordinance that was approved by a majority of the voters in a city, county, or city and county that authorized an increase in the number of gambling tables at a gambling establishment, and that became operative on January 1, 2023, as the result of the recently repealed moratorium, shall remain operative on and after January 1, 2024, as specified.

EXISTING LAW:

- 1) Provides, under the Gambling Control Act (Act), for the licensure and regulation of various legalized gambling activities and gambling establishments by the CGCC and the investigation and enforcement of those activities and establishments by the Bureau.

- 2) Expresses the intent of the Legislature that nothing in the Act shall be construed to preclude any city, county, or city and county from prohibiting any gambling activity, from imposing more stringent local controls or conditions upon gambling than are imposed by the Act or by CGCC.
- 3) Requires any amendment to any ordinance that would result in an expansion of gambling, as defined, in the city, county, or city and county, to be approved by the voters in that jurisdiction, unless that amendment results in an increase of less than 25% with respect to specified matters, including the number of gambling tables or the hours of operation of a gambling establishment in the city, county, or city and county. (Business and Professions Code § 19961.06)
- 4) Provides any amendment to a city or county ordinance relating to gambling establishments, or the Act, shall be submitted to the Bureau for review and comment, before the ordinance is adopted by the city or county. (Business and Professions Code § 19961.1)
- 5) Directs the CGCC to deny gambling licenses to applicants who are not in compliance with the local ordinances governing gambling. (Business and Professions Code § 19860)
- 6) Provides no owner licensee shall operate a gambling enterprise in violation of any governing local ordinance. (Business and Professions Code § 19923)
- 7) The California Constitution, Article IV, Section 19, generally prohibits casinos of the type currently operating in Nevada and New Jersey. However, constitutional amendments together with legislation have created many distinct categories of regulated and legal gambling.
- 8) Provides, under the Cal. Const. Art. IV, Sec. 19 (f) and any other provision of state law, the Governor is authorized to negotiate and conclude compacts, subject to ratification by the Legislature, for the operation of slot machines and for the conduct of lottery games and banking and percentage card games by federally recognized Indian tribes on Indian lands in California in accordance with federal law. Accordingly, slot machines, lottery games, and banking and percentage card games are hereby permitted to be conducted and operated on tribal lands subject to those compacts
- 9) Provides, under the California Penal Code § 330, “Every person who deals, plays, or carries on, opens, or causes to be opened, or who conducts, either as owner or employee, whether for hire or not, any game of faro, monte, roulette, lansquenet, rouge et noire, rondo, tan, fan-tan, seven-and-a-half, twenty-one, hokey-pokey, or any banking or percentage game played with cards, dice, or any device, for money, checks, credit, or other representative of value, and every person who plays or bets at or against any of those prohibited games, is guilty of a misdemeanor, and shall be punishable by a fine not less than one hundred dollars (\$100) nor more than one thousand dollars (\$1,000), or by imprisonment in the county jail not exceeding six months, or by both the fine and imprisonment.”
- 10) Provides, under the California Penal Code § 330.11 that “Banking game” or “banked game” does not include a controlled game if the published rules of the game feature a player-dealer position and provide that this position must be continuously and systematically rotated amongst each of the participants during the play of the game, ensure that the player-dealer is able to win or lose only a fixed and limited wager during the play of the game, and preclude the house, another entity, a player, or an observer from maintaining or operating as a bank during the course of the game. For purposes of this section it is not the intent of the Legislature to mandate

acceptance of the deal by every player if the division finds that the rules of the game render the maintenance of or operation of a bank impossible by other means. The house shall not occupy the player-dealer position.”

FISCAL EFFECT: This bill is keyed fiscal by Legislative Counsel.

COMMENTS:

Purpose of the bill. According to the author, “The cardrooms and the tribes are working collaboratively on this issue. Last year, the legislature ran out of time on reaching an agreement. When first proposed by the cardrooms 25 years ago, the moratorium sought to prevent an oversaturation of gaming to ensure the vitality of the cardroom industry. Those circumstances haven’t changed today, and AB 341 provides a framework for measured growth in the coming years.”

Background:

Card clubs are one of California’s oldest forms of legal gambling. Currently, 83 cardrooms in 32 counties in California are licensed to operate more than 2,100 gaming tables, many of which are located in Los Angeles, the Central Coast, the Bay Area, and the Central Valley. A small percentage are large in scale, the rest are smaller operations (one to two tables) scattered throughout the State. Cardrooms in California are privately owned. That is, no public corporations can invest in the clubs.

Unlike tribal or commercial casinos, cardrooms do not offer slot machines or video poker. In addition to poker and Texas Hold’Em type games, they offer cardroom versions of card games like Blackjack, Baccarat, Three Card Poker, and Pai Gow Poker that must be approved by the Bureau and are subject to local ordinance requirements.

Because of California gaming regulations, players do not play against the house but rather against each other. As a result, each cardroom charges a player’s fee. This is how a cardroom generates revenue rather than the traditional Las Vegas casino style, in which the house doesn’t charge a fee and relies instead on actually banking the game.

The CGCC and the Bureau are responsible for the development of policy, regulatory oversight, and enforcement of the state’s gaming laws at California card clubs. Local governments also regulate California card clubs. At the local level, gaming interests must secure a gaming ordinance. The Bureau and CGCC must then approve the ordinance. Local ordinances must be approved by the host jurisdiction. A newly proposed cardroom or an expansion of gambling, as defined, is subject to a vote and/or referendum by the voters in that jurisdiction.

It has been reported that card club operations directly and indirectly support more than 23,000 jobs in California. The cardroom industry generates more than \$2 billion in economic activity each year and contributes hundreds of millions of dollars to local communities and the state in tax revenue. Cardroom tax revenues help communities fund important local services such as park maintenance, police and fire services, and local road repairs. Some California card clubs generate more than half of the total tax revenue for the municipal general funds in their home cities. For example, one city estimates that casino payments make up about 70 percent of its general fund revenue.

History and Background of Recently Expired Moratorium. Prior to January 2024, there were two statutory moratoriums that restricted the growth of card clubs in California. One moratorium prohibited the state from issuing licenses for new gambling establishments. The other limited licensed gaming establishments from expanding the number of tables and hours they operate. Most local jurisdictions have modified their gambling ordinances to realize the maximum amount of growth allowed by the prior prohibition. As stated above, each of these moratoriums expired/sunsetted on January 1, 2023.

The prior moratorium allowed/prohibited the following actions relating to cardroom licensure and expansion (California Business and Professions Code §§ 19962 and 19963):

1) Prohibited the California Gambling Control Commission until January 1, 2023, from issuing a new gambling establishment that was not licensed prior to December 31, 1999 or did not have an application on file with the Department of Justice prior to September 1, 2000.

2) Prohibited, until January 1, 2023, an ordinance in effect on January 1, 1996, that authorizes legal gaming within a city, county, or city and county from being amended to expand gaming in that jurisdiction beyond that permitted on January 1, 1996, with minor exceptions. In essence, local jurisdictions could not pass ordinances that either authorize legal gambling, or amend their existing ordinances in a way that would constitute an expansion of gambling.

The moratorium restricting the expansion of existing gambling establishments and licensing of new establishments began in 1995. A five-year moratorium was put in place by the enactment of SB 100 (Maddy), Chapter 387, Statutes of 1995. Since this initial moratorium, legislation continuing both moratoriums has been continually enacted. Most recently, AB 1168 (Gipson, Chapter 744, Statutes of 2018) extended the moratorium by three years, from January 1, 2020, to January 1, 2023.

It should be noted that since the enactment of the original moratorium in 1995, the Legislature passed several laws allowing gambling establishments to expand the number of tables in a licensed establishment. The last expansion of tables was enacted in AB 1039 (Hall), Chapter 745, Statutes of 2013, which allowed a city, county, or city and county to amend its local ordinance to increase the number of tables by two, above the number of tables authorized by local ordinance in effect on January 1, 2013. Most local jurisdictions have modified their local ordinances to realize the maximum amount of growth authorized by law.

Despite the expiration of the recent moratorium, existing cardrooms seeking to increase their authorized permanent tables, or individuals seeking to own or operate a new cardroom, must be in compliance with all relevant federal, state, and local laws. Local ordinances limit the number of permanent gaming tables or gambling establishments allowed in their jurisdiction. Any application or request submitted must not exceed the gaming allowances provided by the local jurisdiction.

The CGCC states that they cannot approve a request for an increase in authorized tables, or approve an application for a gambling license to own or operate a new cardroom, without the corresponding local jurisdiction having already enacted a gambling ordinance or expanded their existing gambling ordinance in compliance with current law.

Potential impact on cardrooms in the City of San Jose. A provision in the bill would “require an ordinance that was approved by a majority of the voters in a city, county, or city and county that authorized an increase in the number of gambling tables at a gambling establishment, and that became operative on January 1, 2023, as the result of the repealed moratorium, to remain operative on and after January 1, 2024.”

The general reasoning behind this provision is to resolve an outstanding issue relating to the City of San Jose’s cardroom gaming operations. AB 341 would allow for the implementation of a previous local ballot measure (Measure H of 2020) that was approved (72.63% to 27.37%) by San Jose voters but could not be implemented due to the legality of the previous statewide gaming moratorium that expired on January 1, 2023. Measure H allows local cardrooms (Bay 101 and Casino M8trix) to increase the number of gaming tables (15 more per cardroom) if they pay the city more in annual taxes from gaming operations to fund general services, such as fire protection, 911 emergency response, public safety, street repair, and addressing homelessness. The CGCC ruled that both of the city’s card rooms had already reached the maximum number of tables per card room (49) and any added tables beyond that number would be inconsistent with the Act (previous moratorium).

Regulation and enforcement. Before 1998, California's gambling industry was essentially unregulated. In 1984, the Legislature enacted the Gaming Registration Act that required the Attorney General's office to provide uniform, minimum regulation of California card rooms. However, the scope of the Attorney General's authority was extremely limited and funding was inadequate. Recognizing the need for broader oversight of California's gambling industry, the Legislature enacted the Act in 1997. The Act created a comprehensive scheme for statewide regulation of legal gambling under a bifurcated system of administration involving the Bureau and the five-member CGCC that is appointed by the Governor.

The Act provides the CGCC with jurisdiction over the operation of gambling establishments in California. The Act requires every owner, lessee, or employee of a gambling establishment to obtain and maintain a valid state gambling license and assigns CGCC the responsibility of assuring that gambling licenses are not issued to, or held by, unqualified or disqualified persons, or by persons whose operations are conducted in a manner that is harmful to the public health, safety, or welfare. The Act directs CGCC to issue licenses only to those persons of good character, honesty and integrity; whose prior activities, criminal record, if any, reputation, habits, and associations do not pose a threat to the public interest of this state.

The DOJ, through the Bureau, monitors the conduct of gaming operations to ensure compliance with state gambling laws and conducts extensive background investigations of applicants seeking a state gambling license. The Bureau also conducts background checks for all key employees and state gambling licensees and vendor applications. The Bureau also inspects premises where gambling is conducted, examines gambling equipment, audits papers, books, and records of the gambling establishment, investigates suspected violations of gambling laws, and is ultimately responsible for enforcing compliance with all state laws pertaining to gambling. The Bureau is also responsible for the approval of games that cardrooms are allowed to offer.

Game/gaming activity approval at cardrooms. All controlled games (such as pai gow, poker, etc.) and gaming activities (jackpots, bonuses, tournaments, etc.) must be approved by the Bureau and are subject to local ordinance requirements, regardless of whether the Bureau has approved the game and gaming activity rules for play.

The Act, Business & Professions Code section 19800 et seq., charges the Bureau with the responsibility to review and approve the rules of any game/gaming activity in a cardroom prior to them being offered for play. It is Bureau policy that all requests to review a game and/or gaming activity require an application, a \$1050 fee, which consists of a non-refundable \$500 application fee and \$550 background investigation deposit for the review and approval, and the fee collection schedule for each wagering limit. The Bureau will only begin the review/approval process upon receipt of a complete application and the application fees. Any amendments to a game or gaming activity must be approved prior to it being offered for play in the gambling establishment. Therefore, games that are currently being played in California's cardrooms have been through a specified approval process by the Bureau.

In support. The California Cardroom Alliance (CCA) writes, "AB 341 maintains consumer safety protections and preserves local tax revenues relied on by many cities across the state. It specifically provides a small increase in tables for existing small cardrooms, prohibits massive gaming expansion through the licensing of new cardrooms and an unlimited number of new gaming tables, and ensures the continued economic vitality of local communities dependent on gaming revenues. Without AB 341, the state is vulnerable to the strong possibility of significant expansion of gaming as the long-standing moratorium on cardroom licensing ended as of January 1, 2023. This means that hundreds of dormant local ordinances will be brought back to life without the need for voter approval through a local election. State and local voters will have little ability to stop these licenses and as a result experience unbridled gaming expansion. Moreover, without a moratorium, voters in cities without gaming ordinances could vote to allow one or more cardrooms to be established. "

The California Cities for Self-Reliance Joint Powers Authority (JPA) writes, "Our member cities of Bell Gardens, Commerce, Compton, Cudahy and Hawaiian Gardens, we write to express our support for AB 341 which extends the cardroom moratorium on the expansion of gaming within California until January 2043. Not having a moratorium in place severely harm our cities, our residents and our cardroom industry partners. Extending the current moratorium would provide needed financial stability to our JPA member cities that rely upon revenue from licensed gambling, and it will continue the state's commitment to limit the number of gambling facilities operated in the state."

Supporters state that AB 341 also recognizes the needs of small cardrooms to remain economically viable by allowing those cardrooms with 20 tables or less to add 10 tables over the 20-year moratorium period if certain conditions are met. This is consistent with previous legislation that allowed for such increases in tables that are subject to local government approval, and needed due to the increasing costs of running these highly regulated businesses. Supporters further state that California's cardrooms are critical to many local economies, serving sometimes as the largest employer and single source of total tax revenue helping to fund public safety and health services, housing programs, parks, and senior services. They also provide good-paying jobs and generate additional economic activity that benefits the local community.

The California Nations Indian Gaming Association (CNIGA) supports AB 341 to reinstate the cardroom moratorium that expired on January 1, 2023, and allow for prudent growth of the state's cardroom industry. "For over 20 years, California voters have consistently supported gaming on federally-recognized tribal lands. Tribal casinos have provided a pathway to self-reliance for tribes while creating thousands of jobs and generating billions in economic activity

that benefits both state and local communities. AB 341 is an effort to protect that pathway to tribal self-reliance.”

The Santa Ynez Band of Chumash Indians writes, “At the end of the legislative session, efforts to extend the cardroom moratorium for one year and allow interested parties to work on a solution for the issue was defeated. Since then, there have been ongoing discussions, led by tribes and yourself (Assemblymember Ramos), which will allow for a reasonable compromise that can be supported by all stakeholders. We strongly support this policy approach because it is fair, inclusive, and collaborative.”

In opposition. The Players Casino, a cardroom in the City of Ventura writes in opposition, “AB 341 is a collusive legislative effort that, first, has a retroactive effective date that strains Constitutional credulity, and second, is aimed at visiting serious harm on our card club. Artful and collusive wording of AB 341 prevents Players Casino from adding any tables at all throughout the twenty-year time span of the moratorium. Cardrooms, such as ours contribute to the revenue stream of our host city and any contemplated enactment of this completely valueless bill without permitting meaningful table growth is not only hostile to local cardroom businesses, but is also a deliberate effort to undermine local services and the city revenues that enable those services.”

The California College and University Police Chiefs Association writes that they “are alarmed at a potential cardroom moratorium that does not provide for reasonable table growth for cardrooms in each local jurisdiction. To our chagrin, that potential is now manifested in AB 341, which is oblivious to the reality that local card room businesses are an important revenue stream for local jurisdictions that provide essential funding for local services, including public safety protections.”

Oppose, unless amended. The Yocha Dehe Wintun Nation writes, “For nearly eleven years, our Tribe, as well as many others, have fought to stop the illegal play of banked games at California cardrooms. The Bureau has openly acknowledged that cardrooms play illegal games, but has failed to stop this conduct. AB 341 would actually foster the expansion of this illegal gaming by allowing cardrooms with fewer than twenty tables to add more. Moreover, AB 341 is designed to allow cardrooms in the City of San Jose to add even more tables than those allowed to other cardrooms. What AB 341 proposes is particularly damaging to Yocha Dehe. Almost all cardrooms in our vicinity have fewer than twenty tables. Thus, the increase in the table count will allow the cardrooms to further harm our business with the play of illegal games. In addition, a significant number of our gaming facility’s customers, come from the South Bay area, where San Jose is located. A greater expansion of illegal gaming in that urban market would particularly harm Yocha Dehe. Thus, our Tribe can support AB 341 only if it is amended to preclude the increase in the number of cardroom tables and includes a comprehensive and retroactive moratorium on new cardroom facilities.”

The Shingle Springs Band of Miwok Indians writes, “Approval of AB 341 in its current manner would continue and expand an environment of illegal gaming by the cardrooms. AB 341 proposes to allow all cardrooms with less than twenty tables to indiscriminately increase the number of tables in their facilities. It is important to note that almost every cardroom in our surrounding vicinity have fewer than twenty tables which would allow those cardrooms to do even greater harm to our casino due to their ability to increase the play of illegal games. Additionally, the bill contains a provision designed to specifically allow cardrooms that already

have more than 20 tables in the City of San Jose to add even more tables than those allowed to other cardrooms. AB 341 must be amended to address the issues outlined above.”

Prior legislation. SB 637 (Ochoa Bogh) of 2022. Would have extended the gambling moratorium related to the expansion of card room gaming and the issuance of new gambling licenses from January 1, 2023, to January 1, 2024. (Failed passage in Senate Committee on Governmental Organization)

SB 576 (Archuleta) of 2021. The bill would extend the gambling moratorium related to the expansion of gaming and the issuance of new gambling licenses from January 1, 2023, to January 1, 2028. Additionally, this bill authorizes a city, county, or city and county, to amend its ordinance to increase the number of gambling tables that may be operated in a gambling establishment by up to two tables each calendar year, up to a maximum of 10 additional tables, as specified. (Never heard by the Assembly Committee on Governmental Organization)

AB 1168 (Gipson), Chapter 744, Statutes of 2018. Extended the gambling moratorium related to the expansion of gaming and the issuance of new gambling licenses from January 2, 2020, to January 1, 2023.

SB 654 (Dodd), Chapter 244, Statutes of 2017. Authorized a city, county, or city and county to amend its local ordinance to increase the operation of hours of a gambling establishment to up to 24 hours a day, seven days a week.

AB 1039 (Hall), Chapter 745, Statutes of 2013. Allowed a city, county, or city and county to amend its local ordinance to increase the number of tables by two, above the number of tables authorized by local ordinance in effect on January 1, 2013.

AB 241 (Hall), Chapter 316, Statutes of 2011. Extended the gambling moratorium related to the expansion of cardrooms and the issuance of new cardroom licenses from January 1, 2015 to January 1, 2020.

AB 2193 (Hall) of the 2009-2010 Legislative Session. Would have extended the gambling moratorium related to the expansion of cardrooms and the issuance of new cardroom licenses from January 1, 2015 to January 1, 2020. (Vetoed by Governor)

SB 213 (Florez) of the 2009-2010 Legislative Session. Among other things, would have extended the moratorium on the issuance of new gambling establishments from January 1, 2015 to January 1, 2020. (Vetoed by Governor)

AB 441 (Hall), Chapter 530, Statutes of 2010. Modified provisions of the Act as it relates to the limit on increases in the number of gambling tables that a local jurisdiction may authorize without voter approval.

AB 293 (Mendoza) Chapter 233, Statutes of 2009. Made numerous changes to the Act, including replacing references to "gambling establishments" with "gambling enterprises" in specific sections of the Act.

AB 163 (Mendoza) Chapter 647, Statutes of 2008. Authorized a city or county, without voter approval, to amend an ordinance to increase the number of gambling tables that may be operated

in a gambling establishment by 3 tables if the ordinance in effect on July 1, 2007, provided for 5 to 8 tables, and by 4 tables if the ordinance in effect on July 1, 2007, provided for 9 to 12 tables.

SB 730 (Florez) Chapter 438, Statutes of 2007. Among other things, authorized CGCC to issue licenses for a two-year period and required CGCC to establish a portable key employee license program.

AB 1973 (Bermudez) Chapter 854, Statutes of 2006. Among other things, extended the moratorium on the expansion of gambling from January 1, 2010, to January 1, 2015.

SB 1198 (Florez) Chapter 181, Statutes of 2006. Deleted "wagering limits" from the list of items that are considered expansion of gambling pursuant to the moratorium on the expansion of existing gaming in a locality.

AB 635 (Bermudez) Chapter 694, Statutes of 2005. Permitted local governments to revise their ordinances limiting the number of tables in card rooms by 24.99 percent or two tables, whichever is greater, as compared with the level or number operated or authorized on January 1, 1996, without voter approval.

AB 864 (Firebaugh) Chapter 872, Statutes of 2004. Permitted cities and counties to adopt ordinances permitting the expansion of gambling that result in less than a 25 percent increase, without voter approval.

SB 814 (Vincent) Chapter 799, Statutes of 2003. Authorized CGCC to renew gambling licenses for a period of up to 2 years. Specified that for any license issued for more than one year the licensee shall continue to pay the annual gambling license fee. Also, extended the moratorium on the expansion of gambling from January 1, 2007 to January 1, 2010.

AB 1416 (Wesson), Chapter 1023, Statutes of 2000. Defines what constitutes a prohibited "banking or banked game," and exempts from this definition those games played in licensed card clubs in which the rules of the game utilize a player-dealer position, provided the opportunity to occupy this position continuously and systematically rotates among all seated players and preclude a person or entity from maintaining or operating as a bank during the course of the game.

SB 8 (Lockyer), Chapter 867, Statutes of 1997. Repealed the Gaming Regulation Act, and instead enacted the Gambling Control Act, which provided for DOJ to investigate and enforce controlled gambling in the state. It also establishes CGCC to regulate gambling in this state to issue, suspend, or revoke gambling licenses and extended the moratorium to January 1, 2001.

SB 100 (Maddy) Chapter 387, Statutes of 1995. Established the original moratorium on card room expansion, prohibiting the creation of new card rooms until January 1, 1999.

REGISTERED SUPPORT / OPPOSITION:

Support

2 Kings Gaming INC.
Ace & Vine

Agua Caliente Band of Cahuilla Indians
Artichoke Joe's, INC.
Buena Vista Rancheria of Me-Wuk Indians
Cahuilla Band of Indians
California Cardroom Alliance
California Cities for Self-reliance Joint Powers Authority
Capitol Casino
Casino Club
Club One Casino, INC
CNIGA - California Nations Indian Gaming Association
Communities for California Cardrooms
Elevation Entertainment Group
Elk Valley Rancheria, California
Garlic City Club and Restaurant
Hawaiian Gardens Casino
Jamul Indian Village of California
Kings Card Club
Knighted Ventures
Le Gaming
M8trix Casino
Morongo Band of Mission Indians
Parkwest Casinos
Players Edge
Rincon Band of Luiseno Indians
San Manuel Band of Mission Indians
Santa Ynez Band of Chumash Indians
Seven Mile Casino
Sheriff's Employee Benefits Association (SEBA)
Soboba Band of Luiseno Indians
Stones Gambling Hall
The Commerce Casino & Hotel
The Deuce Lounge and Casino
Tule River Tribe
United Auburn Indian Community
Wilton Rancheria

Oppose

California College and University Police Chiefs Association
California Narcotic Officers Association
Coalition of Public Safety Officer Support Systems
Player's Poker Club, INC.

Oppose Unless Amended

Shingle Springs Band of Miwok Indians
Yocha Dehe Wintun Nation