

CALIFORNIA GAMBLING CONTROL COMMISSION

CALIFORNIA CODE OF REGULATIONS
TITLE 4. BUSINESS REGULATIONS
DIVISION 18. CALIFORNIA GAMBLING CONTROL COMMISSION (§ 12002 et seq.)

IMPLEMENTATION OF GOVERNOR'S REORGANIZATION PLAN NO. 2 OF 2012 CGCC-GCA-2013-01-N

SECTION 100. CHANGES WITHOUT REGULATORY EFFECT

Pursuant to Title 1, Division 1, Chapter 1, Article 2, Section 100(b)(3), of the California Code of Regulations (CCR), the California Gambling Control Commission (Commission) hereby submits this written statement explaining why the proposed changes to CCR Title 4, Division 18, Section 12002 *et seq.*,¹ as detailed below, have no regulatory effect:

THE REGULATIONS ARE INCONSISTENT WITH AND SUPERSEDED BY STATUTORY CHANGES

The Governor's Reorganization Plan No. 2 of 2012 (GRP No. 2) became effective July 3, 2012 with an operative date of July 1, 2013. GRP No. 2 made numerous changes to the Gambling Control Act (Act)² that consolidated the support, investigatory, auditing, and compliance functions of the Commission and transferred these duties to the Department of Justice (Department).³ GRP No. 2 also required the Department, instead of the Commission, to receive and process applications for any license, permit, or other approval and to collect related fees. In addition, GRP No. 2 also amended sections 326.3 and 326.5 of the Penal Code to consolidate and transfer to the Department similar duties as they relate to Remote Caller Bingo and the approval of bingo card-minding devices. The Commission has retained its policy-making authority, the authority to approve licenses, and the authority to monitor revenues for specific funds.

Many of the sections contained in Division 18 of Title 4 are inconsistent with and have been superseded by these recent statutory changes. Currently, in exercising the regulatory authority of the Commission and the investigative and law enforcement powers of the Department, duties to receive and process applications, fees, and information are shared. Numerous regulations refer to duties currently assigned to or performed by the Commission that have now become the responsibility of the Department.

As it relates to the Commission's Section 100 changes, the relevant statutory changes included in GRP No. 2 are as follows:

¹ All references to the California Code of Regulations hereinafter apply to Division 18 of Title 4, unless otherwise specified.

² Business and Professions Code, Division 8, Chapter 5, Section 19800, *et seq.*

³ In the Act, "department" refers to the Department of Justice. While the Act assigns certain powers and authority to the department, in actual practice the responsibility for fulfilling the obligations imposed upon the department is delegated to the Bureau of Gambling Control, pursuant to Business and Professions Code section 19810.

Business and Professions Code

Section 19826 was amended to require the Department, not the Commission, to perform all investigatory functions under the Act, tribal gaming compact auditing functions, to receive and process applications for any license, permit, or other approval, and to collect all related fees. Section 19826 also clarifies that the Department shall investigate the qualifications of all applicants.

Section 19864 was amended to require submission of applications for licenses, permits, and approvals to the Department on forms provided by the Department.

Section 19881 was amended to require submission to and approval by the Department (instead of the Commission) of the articles of incorporation for a gambling enterprise.

Section 19881.5, which allowed the Commission to delegate to Commission staff the approval of articles of incorporation, was repealed.

Penal Code

Section 326.3(q)(3) was amended to require submission of remote caller bingo applications and fees to the Department rather than to the Commission.

Section 326.3(u)(4) was amended to require prior approval by the Department (instead of the Commission) of a nonprofit organization's remote caller bingo controls, methodologies and standards of game play, and provided that the controls shall be deemed approved by the Department (instead of the Commission), as specified.

Section 326.3(w)(1) was amended to require the vendor of the equipment used in a remote caller bingo game to submit their annual independent audit reports to the Department rather than the Commission, and to authorize the Department, not the Commission, to audit the books and records of a vendor at any time.

Section 326.5(p) was amended to give the Department the sole authority and responsibility over bingo card-minding devices. It is now the responsibility of the Department (instead of the Commission) to approve, inspect, or prohibit the use of bingo card-minding devices. The amendments also define "department" to mean the Department of Justice.

GRP No. 2 Provisions

SECTION 329 of GRP No. 2, an uncodified provision, specifies that these changes shall become operative on July 1, 2013, but permits an affected state agency, which includes the Commission, to take actions prior to July 1, 2013 that are necessary to ensure that the provisions of the plan are fully implemented on July 1, 2013.

THE COMMISSION HAS NO DISCRETION TO ADOPT A CHANGE THAT DIFFERS IN SUBSTANCE

This proposed action will make conforming changes throughout Division 18 (See Tab 2. Proposed § 100 Changes) by changing references from the Commission to the Bureau of Gambling Control (Bureau),⁴ as appropriate, related to the consolidation and reassignment of responsibilities. Conforming changes will also be made, as appropriate, in forms included in appendices or incorporated by reference in Division 18. These regulatory changes are consistent with and mandated by the recent amendments to the Act and the Penal Code resulting from GRP No. 2.

Leaving the references in Division 18 unchanged would conflict with the current statutory provisions of the Act as described above. This would result in unnecessary confusion and complication in interpreting, applying, and enforcing these regulatory provisions. The only logical and practical solution available to the Commission is to amend its regulations to conform to the statutory changes enacted through GRP No. 2.

SPECIFIC FINDINGS

With respect to the foregoing, the Commission finds as follows:

Necessity:

Given the change in responsibilities in the Act resulting from the amendments made by GRP No. 2, there is clearly a need to provide clarification in the Commission's regulations. There are numerous references throughout those regulations that now incorrectly refer to responsibilities of the Commission and Bureau that have changed. There is a compelling need to implement, interpret and make specific the provisions of the Act by the adoption of regulations that make reference to the proper entity responsible for specific functions.⁵

Consistency:

With respect to references to the Commission and Bureau, numerous sections throughout the Commission's regulations are not in harmony with, and conflict with the provisions of the Act as amended by GRP No. 2.⁶ As discussed above, the amended statutory provisions change the responsibilities of the Commission and the Bureau. This inconsistency could lead to unnecessary confusion.

⁴ While the Act assigns certain powers and authority to the department, in actual practice the responsibility for fulfilling the obligations imposed upon the department is delegated to the Bureau of Gambling Control (Bureau), pursuant to Business and Professions Code section 19810. Therefore, these regulations refer to the Bureau rather than the Department

⁵ Government Code § 11349(a) and Title 1, California Code of Regulations, § 10.

⁶ Government Code § 11349(d).

THE PROPOSED ACTION HAS NO REGULATORY EFFECT

The proposed changes will not materially alter any requirement, right, responsibility, condition, prescription or other regulatory element of any CCR provision. These proposed changes simply conform to the changes made by GRP No. 2 in the Act and specific provisions of the Penal Code.

GRAMMATICAL AND EDITORIAL CHANGES

This proposal also includes various grammatical and editorial changes not directly related to GRP No. 2 that are merely clarifying and conforming in nature. None of these changes will alter any of the provisions of the affected sections. Because these changes will not materially alter any requirement, right, responsibility, condition, prescription or other regulatory element of any CCR provision, they will also have no regulatory effect.

SPECIFIC CHANGES

This proposed action amends the following sections of CCR Title 4, Division 18, to conform to the provisions of GRP No. 2:

Section 12101

- Subsections (a) through (d) – The Commission's application forms are converted to Bureau forms and the form numbers and revision dates are changed accordingly. These changes conform to the GRP No. 2 amendment of sections 19826(a) and 19864(a).

Section 12120

- Subsections (c), (d) and (e) – The references to the Commission and Executive Director regarding submission and processing of the application and the fee are changed to reference the Bureau in accordance with the GRP No. 2 amendment of section 19826(a).
- Subsection (f) – The reference to Executive Director is deleted as it is unnecessary. In light of the separation of application processing functions from approval functions created by GRP No. 2, both the Executive Director and the Bureau will cease performing their respective activities regarding the temporary work permit when a withdrawal of a regular work permit application is submitted.

Section 12122

- Subsection (a) – The Commission's application form number is changed to conform to the conversion of the form in section 12101. This change conforms to the GRP No. 2 amendment of section 19864(a).
- Subsection (b) – The reference to the Commission regarding submission of documents and information is changed to reference the Bureau. This change conforms to the GRP No. 2 amendment of section 19826(a).

Section 12126

- Subsection (a) – The reference to the Commission's Executive Director regarding submission and processing of the application is changed to reference the Bureau in

accordance with the GRP No. 2 amendment of section 19826(a).

Section 12130

- Subsection (b) – The references to the Commission and Executive Director regarding submission, receipt, and processing of a work permit transfer are changed to reference the Bureau in accordance with the GRP No. 2 amendment of section 19826(a). The term “issue” is changed to “provide” for clarification as the Commission retains the authority and responsibility of approving and issuing licenses, registrations and permits while the Bureau will assume the ministerial, administrative task of printing and distributing (i.e., “providing”) the indicia of a license, registration or permit to the applicant. The word “badge” is inserted to differentiate between a new work permit (which continues to require Commission action) and a change in badge information (which is processed by the Bureau under GRP No. 2). The Commission’s application form number is changed to conform to the conversion of the form in section 12101. The phrase “or the Bureau” in paragraph (3) referring to the issuance of a work permit is deleted as inaccurate, as only the Commission has the authority to approve and issue work permits. These changes conform to the GRP No. 2 amendment of sections 19826(a) and 19864(a).
- Subsection (c) - The term “issued” is changed to “provided” for clarification as the Commission retains the authority and responsibility of approving and issuing licenses, registrations and permits while the Bureau will assume the ministerial, administrative task of printing and distributing (i.e., “providing”) the indicia of a license, registration or permit to the applicant, in accordance with the GRP No. 2 amendment of section 19826(a).
- Subsections (d) and (e) – The reference to the Executive Director informing the Bureau of the issuance of a transferred badge is deleted as it is no longer necessary. The Bureau will already be processing the badge in accordance with the GRP No. 2 amendment of section 19826(a). Subsection (e) is renumbered as (d) accordingly.
- Subsection (e) [renumbered as (d)] – The references to issuing a permit are either replaced with references to providing a permit for clarification, or are deleted where appropriate. The Commission retains the authority and responsibility of approving and issuing licenses, registrations and permits while the Bureau will assume the ministerial, administrative task of printing and distributing (i.e., “providing”) the indicia of a license, registration or permit to the applicant, in accordance with the GRP No. 2 amendment of section 19826(a).
- Reference Citations – Business and Professions Code sections that are no longer applicable are deleted and a correct reference is added.

Section 12132

- Subsection (a) – The reference to the Executive Director regarding submission and processing of the application is changed to reference the Bureau in accordance with the GRP No. 2 amendment of section 19826(a).

Section 12140

- Subsection (a) – The references to the Commission and Executive Director regarding the issuance of a replacement work permit badge are changed to reference the Bureau. The term “issue” is changed to “provide” for clarification as the Commission retains the authority and responsibility of approving and issuing licenses, registrations and permits while the Bureau will assume the ministerial, administrative task of printing and distributing (i.e., “providing”) the indicia of a license, registration or permit to the applicant. The Commission’s application form number is changed to conform to the conversion of the form in section 12101. These changes conform to the GRP No. 2 amendment of sections 19826(a) and 19864(a). As the Bureau will receive and process the application for the replacement work permit badge, the Bureau will also perform the ministerial, administrative task of providing the badge.
- Subsections (b) and (c) – The references to issuing a replacement badge are either replaced with references to providing a badge for clarification, or are deleted where appropriate. The Commission retains the authority and responsibility of approving and issuing licenses, registrations and permits while the Bureau will assume the ministerial, administrative task of printing and distributing (i.e., “providing”) the indicia of a license, registration or permit to the applicant, in accordance with the GRP No. 2 amendment of section 19826(a).
- Reference Citations – Business and Professions Code sections that are incorrect or no longer applicable are deleted and a correct reference is added.

Section 12142

- Subsection (a) – The reference to the Executive Director notifying an applicant that an application is complete and accepted is changed to reference the Bureau in accordance with the GRP No. 2 amendment of section 19826(a). As the Bureau will receive and process the application, the Bureau will perform the administrative task of notifying the applicant regarding the completeness of the application.
- Subsection (b) – The term “issued” is changed to “provided” for clarification as the Commission retains the authority and responsibility of approving and issuing licenses, registrations and permits while the Bureau will assume the ministerial, administrative task of printing and distributing (i.e., “providing”) the indicia of a license, registration or permit to the applicant, in accordance with the GRP No. 2 amendment of section 19826(a).

Section 12200

- Subsection (b), paragraphs (1), (24) and (30) – The term “issued” is changed to “provided” for clarification as the Commission retains the authority and responsibility of approving and issuing licenses, registrations and permits while the Bureau will assume the ministerial, administrative task of printing and distributing (i.e., “providing”) the indicia of a license, registration or permit to the applicant, in accordance with the GRP No. 2 amendment of section 19826(a). The phrase “by the Commission” is unnecessary and is deleted as Section 12200.6 specifies by whom the badge will be provided.

- Subsection (b), paragraph (27) – The reference to the submission of information to the Commission is changed to reference the Bureau in accordance with the GRP No. 2 amendment of section 19826(a). Parentheses are changed to comas for clarity.

Section 12200.3

- Subsection (b) – The requirement to submit a notification to the Commission, in addition to the Bureau, is deleted as unnecessarily duplicative when the Bureau has the responsibility for investigations under the GRP No. 2 amendment of section 19826(a). The Commission's application form is converted to a Bureau form, and the form number and revision date are changed accordingly. This change conforms to the GRP No. 2 amendment of section 19864(a).

Section 12200.5

- Subsection (a) – The references to the Commission and Executive Director performing the administrative tasks are changed to reference the Bureau. The term “issue” is changed to “provide” for clarification as the Commission retains the authority and responsibility of approving and issuing licenses, registrations and permits while the Bureau will assume the ministerial, administrative task of printing and distributing (i.e., “providing”) the indicia of a license, registration or permit to the applicant. These are processing functions. The Commission's application form is converted to a Bureau form, and the form number and revision date are changed accordingly. These changes conform to the GRP No. 2 amendment of sections 19826(a) and 19864(a).
- Subsections (b) and (c) – The references to issuing a replacement badge are either replaced with references to providing a badge for clarification, or are deleted where appropriate. The Commission retains the authority and responsibility of approving and issuing licenses, registrations and permits while the Bureau will assume the ministerial, administrative task of printing and distributing (i.e., “providing”) the indicia of a license, registration or permit to the applicant, in accordance with the GRP No. 2 amendment of section 19826(a).
- Subsection (d) – The reference to the administrative task of badge replacement being performed by the Commission is changed to the replacement badge being provided by the Bureau in accordance with the GRP No. 2 amendment of section 19826(a), related to processing.
- Reference Citations – Applicable Business and Professions Code sections are added.

Section 12200.6

- Subsections (a), (b), (c), and (d) – The references to the Commission and Executive Director performing the administrative tasks for the transfer or reinstatement badge are changed to reference the Bureau. The references to issuing a transfer, reinstatement or additional badge are either replaced with references to providing a badge for clarification, or are deleted where appropriate. The Commission retains the authority and responsibility of approving and issuing licenses, registrations and permits while the Bureau will assume the ministerial, administrative task of printing and distributing (i.e.,

“providing”) the indicia of a license, registration or permit to the applicant, in accordance with the GRP No. 2 amendment of section 19826(a). These are processing functions. The Commission’s application form is converted to a Bureau form, and the form number and revision date are changed accordingly. These changes conform to the GRP No. 2 amendment of sections 19826(a) and 19864(a).

- Reference Citations – Applicable Business and Professions Code sections are added.

Section 12200.10B

- Subsection (a) – The deposit amount is deleted. The currently stated amount (\$450) is not consistent with the amount set forth in the Bureau’s regulation (11 CCR § 2037). Eliminating the specific amount avoids having to amend the Commission’s regulations if the Bureau adjusts the deposit amount in the future. While this amendment is not directly related to GRP No. 2, it is a nonsubstantive editorial, grammatical, and conforming change that has no regulatory effect.

Section 12200.14

- Subsections (a) and (b) – The references to the Commission receiving the documents are changed to refer to the Bureau. The Commission’s application form is converted to a Bureau form, and the form number and revision date changed accordingly. These changes conform to the GRP No. 2 amendment of sections 19826(a) and 19864(a).
- Subsection (c) – The requirement to submit a notification to the Commission, in addition to the Bureau, is deleted as unnecessarily duplicative in light of the Bureau’s investigation responsibilities under the GRP No. 2 amendment of section 19826(a).

Section 12200.20

- Subsections (a), (b), (c), (d) and (f) – References to the Commission and Executive Director receiving fees and performing administrative tasks related to the collection of fees are changed to reference the Bureau in accordance with the GRP No. 2 amendment of section 19826(a).

Section 12202

- Subsections (b) and (c) – The references to the Commission receiving the application are changed to refer to the Bureau. The Commission’s application forms are converted to Bureau forms, and the form numbers and revision dates are changed accordingly. These changes conform to the GRP No. 2 amendment of sections 19826(a) and 19864(a).
- Subsection (d) – The reference to the Commission is deleted to remove redundancy in light of the Bureau’s investigation responsibilities under the GRP No. 2 amendment of section 19826(a).

Section 12203

- Subsections (a) and (d) – The references to the Commission and Executive Director performing administrative tasks related to processing the application are changed to reference the Bureau in accordance with the GRP No. 2 amendment of section 19826(a).

- Subsection (b) – The responsibility for processing and approving by the Executive Director is separated to accommodate the responsibility of the Bureau to process and the Executive Director to approve the application in accordance with the GRP No. 2 amendment of section 19826(a).

Section 12203A

- Subsections (c), (e) and (f) – The references to the Commission and Executive Director performing administrative tasks related to processing the application are changed to reference the Bureau in accordance with the GRP No. 2 amendment of section 19826(a). Additional notice to the Commission is added to keep the Commission informed that a registration will not be renewed.
- Subsection (d) – The responsibility for processing and approving the application by the Executive Director is separated to accommodate the responsibility of the Bureau to process and the Executive Director to approve the application in accordance with the GRP No. 2 amendment of section 19826(a).

Section 12203.2

- Introductory paragraph – The reference to receipt of the application by the Executive Director is changed to reference the completion of the application processing in accordance with the GRP No. 2 amendment of section 19826(a).
- Subsection (a) – The Commission's application form number is changed to conform to the conversion of the form in section 12202. This change conforms to the GRP No. 2 amendment of section 19864(a).
- Subsection (b) – The reference to receipt of the application by the Commission is changed to reference the Bureau in accordance with the GRP No. 2 amendment of section 19826(a).

Section 12203.3

- Introductory paragraph and subsection (a) – The reference to the Commission and Executive Director performing administrative tasks related to processing an application is changed to reference the Bureau in accordance with the GRP No. 2 amendment of section 19826(a).

Section 12205.1

- Subsections (a) and (c) – The references to the Commission receiving fees are changed to refer to the Bureau. The Commission's application forms are converted to Bureau forms, and the form numbers and revision dates are changed accordingly. These changes conform to the GRP No. 2 amendment of sections 19826(a) and 19864(a). Additionally, the now redundant reference to the Bureau in the second sentence of subsection (a) is deleted as unnecessary.

Section 12218

- Subsections (a) and (c) – The references to the Commission receiving the application are changed to refer to the Bureau. The Commission's application form number is changed to conform to the conversion of the form in section 12205.1. These changes conform to the GRP No. 2 amendment of sections 19826(a) and 19864(a).

Section 12218.7

- Subsection (a) – The reference to the Commission notifying an applicant that an application is complete and accepted for initial processing is changed to reference the Bureau. The Commission's application form numbers are changed to conform to the conversion of the forms in section 12205.1. These changes conform to the GRP No. 2 amendment of sections 19826(a) and 19864(a). The last sentence is deleted as the Commission will no longer receive and process applications in accordance with section 19826(a).
- Subsection (b) – This subsection is deleted as the Commission will no longer receive and process applications in accordance with section 19826(a). Subsections (c) through (e) are renumbered accordingly.
- Subsection (c) [Renumbered as subsection (b)] – The reference to the Bureau receiving information from the Commission is deleted as the Commission will no longer receive and process applications in accordance with the GRP No. 2 amendment of section 19826(a).
- Subsection (d) [Renumbered as subsection (c)] – Conforming editorial changes are made, deleting the reference to subsection (b) and renumbering the reference to subsection (c) to refer to subsection (a). These are conforming editorial changes.

Section 12218.8

- Subsection (a) – The requirement for timely submission of an application in section 12218.9 is misplaced as it applies to submission of applications and not processing. The more logical location for this requirement is in this section (12218.8) which pertains to the submission of renewal applications. This change is not related to GRP No. 2, but is a technical, editorial, and grammatical change that has no regulatory effect. The sentence is deleted from Section 12218.9 and is inserted here with no alteration other than the reference to the Commission being changed to reference the Bureau to conform to the GRP No. 2 amendment of section 19826(a). The Commission's application form numbers are changed to conform to the conversion of the forms in section 12205.1. This change conforms to the GRP No. 2 amendment of section 19864(a).
- Subsection (c) – The paragraph (1) designation is deleted so that the sentence is incorporated into subsection (c) for clarity and continuity since there is no paragraph (2).

Section 12218.9

- Subsection (a) – The misplaced statement regarding application submission is deleted from this processing section and inserted into the Section 12218.8, as discussed above. The references to the Commission performing administrative tasks related to processing

an application are deleted in accordance with the GRP No. 2 amendment of section 19826(a). Paragraph (3) is deleted as this is no longer the responsibility of the Commission (applications will be received by the Bureau for processing). The remaining paragraphs are renumbered accordingly.

- Subsection (a), paragraph (4) [Renumbered as paragraph (2)] – The reference to the Commission is changed to reference the Bureau as the Commission will no longer receive and process applications in accordance with the GRP No. 2 amendment of section 19826(a).
- Subsection (b) – The references to the paragraphs of subsection (a) are deleted as unnecessary.

Section 12220

- Subsection (b), paragraph (1) – The term “issued” is changed to “provided” for clarification as the Commission retains the authority and responsibility of approving and issuing licenses, registrations and permits while the Bureau will assume the ministerial, administrative task of printing and distributing (i.e., “providing”) the indicia of a license, registration or permit to the applicant, in accordance with the GRP No. 2 amendment of section 19826(a). The phrase “by the Commission” is unnecessary and is deleted as Section 12220.6 specifies by whom the badge will be provided.
- Subsection (b), paragraphs (24) and (28) – The term “issued” is changed to “provided” for clarification as the Commission retains the authority and responsibility of approving and issuing licenses, registrations and permits while the Bureau will assume the ministerial, administrative task of printing and distributing (i.e., “providing”) the indicia of a license, registration or permit to the applicant, in accordance with the GRP No. 2 amendment of section 19826(a). The phrase “by the Commission” is unnecessary and is deleted as Section 12220.6 specifies by whom the badge will be provided.
- Subsection (b), paragraph (27) – The reference to the Commission is changed to reference the Bureau as the Commission will no longer receive and process applications in accordance with the GRP No. 2 amendment of section 19826(a).

Section 12220.3

- Subsection (b) – The notification to be submitted to the Commission in addition to the Bureau is deleted as unnecessarily duplicative when the Bureau has the responsibility for investigations under the GRP No. 2 amendment of section 19826(a). The Commission’s application form is converted to a Bureau form, and the form number and revision date are changed accordingly to conform to the GRP No. 2 amendment of section 19864(a).

Section 12220.5

- Subsections (a), (b), (c), and (d) – The references to issuing a replacement badge are either replaced with references to providing a badge for clarification, or are deleted where appropriate. The Commission retains the authority and responsibility of approving and issuing licenses, registrations and permits while the Bureau will assume the ministerial, administrative task of printing and distributing (i.e., “providing”) the indicia of a license,

registration or permit to the applicant, in accordance with the GRP No. 2 amendment of section 19826(a). As the Bureau will receive and process the approval form and collect the fee, the Bureau will provide the replacement badge. The Commission's approval form is converted to a Bureau form, and the form number and revision date are changed accordingly to conform to the GRP No. 2 amendment of section 19864(a).

- Reference Citations – Additional Business and Professions Code sections are added.

Section 12220.6

- Subsections (a), (b), (c), and (d) – The references to issuing a transfer, reinstatement or additional badge are either replaced with references to providing a badge for clarification, or are deleted where appropriate. The Commission retains the authority and responsibility of approving and issuing licenses, registrations and permits while the Bureau will assume the ministerial, administrative task of printing and distributing (i.e., “providing”) the indicia of a license, registration or permit to the applicant, in accordance with the GRP No. 2 amendment of section 19826(a). As the Bureau will receive and process the approval form and collect the fee, the Bureau will provide those specified badges. The Commission's approval form is converted to a Bureau form, and the form number and revision date are changed accordingly to conform to the GRP No. 2 amendment of section 19864(a).
- Reference Citations – Additional Business and Professions Code sections are added.

Section 12220.14

- Subsections (a) and (b) – The references to the Commission receiving application documents are changed to refer to the Bureau. The Commission's application form is converted to a Bureau form, and the form number and revision date are changed accordingly. These changes conform to the GRP No. 2 amendment of sections 19826(a) and 19864(a).
- Subsection (c) – The reference to the Commission is deleted to remove redundancy in light of the Bureau's investigation responsibilities under the GRP No. 2 amendment of section 19826(a).

Section 12220.20

- Subsections (a), (b), (c), (d) and (f) – The references to fee receipt, notice, and accounting by the Commission and Executive Director are changed to reference the Bureau in accordance with the GRP No. 2 amendment of section 19826(a).

Section 12222

- Subsections (b) and (c) – The references to the Commission receiving the application are changed to refer to the Bureau. The Commission's application forms are converted to Bureau forms, and the form numbers and revision dates are changed accordingly. These changes conform to the GRP No. 2 amendment of sections 19826(a) and 19864(a).
- Subsection (d) – The reference to the Commission is deleted to remove redundancy in light of the requirement for the Bureau to receive and process applications and the

Bureau's investigation responsibilities under the GRP No. 2 amendment of section 19826(a).

Section 12223

- Subsections (a) and (d) – The references to the Commission and Executive Director notifying the applicant that an application is complete and accepted for initial processing, or has been deemed abandoned, are changed to reference the Bureau in accordance with the GRP No. 2 amendment of section 19826(a). As the Bureau will receive and process the application, the Bureau will perform the administrative task of notifying the application regarding the completeness of the application.
- Subsection (b) – The responsibility for processing and approving the applications by the Executive Director is separated to accommodate the responsibility of the Bureau to process and the Executive Director to approve the application in accordance with the GRP No. 2 amendment of section 19826(a).

Section 12225.1

- Subsections (a) and (b) – The references to the Commission receiving applications and fees are changed to refer to the Bureau. The Commission's application forms are converted to Bureau forms, and the form numbers and revision dates are changed accordingly. These changes conform to the GRP No. 2 amendment of sections 19826(a) and 19864(a). Additionally, the now redundant reference to the Bureau in the second sentence is deleted as unnecessary. The references to certain paragraphs of subsection (e) of Section 12008 are incorrect and are updated with the correct references.

Section 12233

- Subsections (a) and (c) – The references to the Commission receiving the application are changed to refer to the Bureau. The Commission's application form numbers are changed to conform to the conversion of the forms in section 12225.1. These changes conform to the GRP No. 2 amendment of sections 19826(a) and 19864(a).

Section 12235

- Subsection (a) – The reference to the Commission notifying an applicant that an application is complete and accepted for initial processing is changed to reference the Bureau. As the Bureau will receive and process the application, the Bureau will perform the administrative task of notifying the applicant regarding the completeness of the application. The Commission's application form numbers are changed to conform to the conversion of the forms in section 12233. These changes conform to the GRP No. 2 amendment of sections 19826(a) and 19864(a). The last sentence is deleted as the Commission will no longer receive and process applications in accordance with section 19826(a).
- Subsection (b) – This subsection is deleted as the Commission will no longer receive and process applications in accordance with section 19826(a). Subsections (c) through (e) are renumbered accordingly.

- Subsection (c) [Renumbered as subsection (b)] – The reference to the Bureau receiving information from the Commission is deleted as the Commission will no longer receive and process applications in accordance with the GRP No. 2 amendment of section 19826(a).
- Subsection (d) [Renumbered to subsection (c)] – Conforming editorial changes are made, deleting the reference to subsection (b) and renumbering the reference to subsection (c) to refer to subsection (a).

Section 12238

- Subsection (a) – The requirement for timely submission of an application in section 12239 is misplaced as it applies to submission of applications and not processing. The more logical location for this requirement is in this section (12238) which pertains to the submission of renewal applications. This change is not related to GRP No. 2, but is a technical, editorial, and grammatical change that has no regulatory effect. The sentence is deleted from Section 12239 and is inserted here with no alteration other than the reference to the Commission being changed to reference the Bureau to conform to the GRP No. 2 amendment of section 19826(a). The Commission's application forms are converted to Bureau forms, and the form numbers and revision dates are changed accordingly to conform to the GRP No. 2 amendment of section 19864(a).
- Subsection (c) – The paragraph (1) designation is deleted so that the sentence is merged under subsection (c) for clarity and continuity since there is no paragraph (2).

Section 12239

- The misplaced statement regarding application submission is deleted from this processing section and inserted into the Section 12238, as discussed above. The references to the Commission processing an application are changed to reference the Bureau in accordance with the GRP No. 2 amendment of section 19826(a). Paragraph (3) is deleted as this is no longer the responsibility of the Commission. The remaining paragraphs are renumbered accordingly.
- Subsection (a), paragraph (4) [Renumbered as paragraph (2)] – The reference to the Bureau receiving information from the Commission is deleted as the Commission will no longer receive and process applications in accordance with the GRP No. 2 amendment of section 19826(a).
- Subsection (b) – Conforming editorial changes are made, deleting the reference to paragraphs (2) through (4) of subsection (a) as no longer correct or necessary.

Section 12301

- Subsection (a) – The verb “issued” is added for clarity.
- Subsection (b) – The references to the Commission regarding the receipt and processing of the application are changed to reference the Bureau in accordance with the GRP No. 2 amendment of section 19826(a).

Section 12301.1

- Subsection (a) – The Commission's application form is converted to a Bureau form, and the form number and revision date are changed accordingly to conform to the GRP No. 2 amendment of section 19864(a).
- Subsection (c) – The reference to Commission inspection of records is deleted in light of the Bureau's investigation responsibilities under the GRP No. 2 amendment of section 19826(a).

Section 12302

- Subsection (c) – The references to the Executive Director notifying an applicant that an application is complete and accepted for filing are changed to reference the Bureau in accordance with the GRP No. 2 amendment of section 19826(a). As the Bureau will receive and process the application, the Bureau will perform the administrative task of notifying the applicant regarding the completeness of the application. The responsibility for processing and approving by the Executive Director is changed to accommodate the responsibility of the Bureau to process and the Executive Director to approve the application in accordance with the GRP No. 2 amendment of section 19826(a).

Section 12303

- Title – The operative date is deleted as unnecessary.
- Subsection (a), paragraph (1) – The requirement to submit reports in duplicate to the Executive Director as a condition of continued registration with the Commission is changed to submission of the report to the Bureau in accordance with the GRP No. 2 amendment of section 19826(a).
- Subsection (a), paragraph (1), subparagraph (A), clause 3. – The comma is changed to a period for consistency.
- Subsection (a), paragraph (1), subparagraph (D) – The reference to the Commission receiving a report is deleted as the Commission will no longer receive these reports in accordance with the GRP No. 2 amendment of section 19826(a). Several editorial changes are made in this subsection for clarification, consistency and to conform to the GRP No. 2 amendment of section 19826(a).
- Subsection (a), paragraph (2) – The reference to submission of information to the Commission is changed to reference the Bureau in accordance with the GRP No. 2 amendment of section 19826(a).
- Subsection (a), paragraph (3) – The reference to submission of information to the Commission is deleted to remove redundancy in light of the Bureau's investigation responsibilities under the GRP No. 2 amendment of section 19826(a).
- Subsection (a), paragraph (5) – The references to submitting to audits conducted by the Commission is changed to reference the Bureau in accordance with the Bureau's investigation responsibilities under GRP No. 2 amendment of section 19826(a).

Section 12304

- Subsections (b) – The reference to Commission providing notice of a violation is deleted as it is the Bureau that provides that notice under its investigation responsibilities in accordance with the GRP No. 2 amendment to section 19826(a).
- Subsection (c) – The reference to the Commission receiving the report is changed to reference the Bureau as the Commission will no longer receive these reports in accordance with the GRP No. 2 amendment of section 19826(a).

Section 12305

- Subsection (a) – The requirement for the Commission providing to the Bureau copies of records submitted by applicants is changed to the Bureau providing those records to the Commission, as the Bureau will directly receive records from applicants in accordance with the GRP No. 2 amendment of section 19826(a). Several commas are added for clearer sentence structure.

Section 12309

- Subsections (a) and (b) – The Commission's application forms are converted to Bureau forms, and the form numbers and revision dates are changed accordingly to conform to the GRP No. 2 amendment of section 19864(a).

Section 12310

- The reference to the Commission receiving quarterly reports is changed to reference the Bureau in accordance with Bureau's investigatory and tribal auditing functions under the GRP No. 2 amendment of section 19826.

Section 12342

- Subsection (a) – The Commission's application form is converted to a Bureau form, and the form number and revision date are changed accordingly to conform to the GRP No. 2 amendment of section 19864(a).
- Subsection (b), paragraph (1) – The reference to the Commission notifying an applicant that an application is complete and accepted for initial processing is changed to reference the Bureau. As the Bureau will receive and process the application, the Bureau will perform the administrative task of notifying the applicant regarding the completeness of the application. The Commission's application form number is changed to conform to the conversion of the form in subsection (a). These changes conform to the GRP No. 2 amendment of sections 19826(a) and 19864(a). The last sentence is deleted as the Commission will no longer receive and process applications in accordance with section 19826(a).
- Subsection (b), paragraph (2) – This paragraph is deleted as the Commission will no longer receive and process applications in accordance with section 19826(a). Paragraphs (3) through (5) are renumbered accordingly.

- Subsection (b), paragraph (3) [Renumbered as paragraph (2)] – The reference to the Bureau receiving information from the Commission is deleted as the Commission will no longer receive and process applications in accordance with the GRP No. 2 amendment of section 19826(a).
- Subsection (b), paragraph (4) [renumbered as paragraph (3)] – Conforming editorial changes are made, deleting the reference to paragraph (2) and renumbering the reference to paragraph (3) to refer to paragraph (1).
- Subsection (c) – The incorrect reference to subsection (a) is corrected to refer to subsection (b). The addition of the Bureau in paragraph (3) conforms to the change in application processing responsibilities under the GRP No. 2 amendment of section 19826(a).

Section 12345

- Subsections (a) and (b) – The references to the submission of renewal applications to the Commission are changed to reference the Bureau. The Commission's application form number in paragraph (1) of subsection (a) is changed to conform to the conversion of the form in section 12342. These changes conform to the GRP No. 2 amendments of sections 19826(a) and 19864(a).
- Subsection (c), paragraph (1) – The references to the Commission notifying an applicant that an application is complete and accepted for initial processing are changed to reference the Bureau in accordance with the GRP No. 2 amendment of section 19826(a). As the Bureau will receive and process the application, the Bureau will perform the administrative task of notifying the applicant regarding the completeness of the application.
- Subsection (c), paragraph (2) – This paragraph is deleted as the Commission will no longer receive and process applications in accordance with the GRP No. 2 amendment of section 19826(a). Paragraph (3) is renumbered as paragraph (2) accordingly.
- Subsection (d) – Editorial changes are made, deleting the unnecessary and now inaccurate reference to paragraphs (1) and (2) of subsection (c) to conform to the above changes made in that subsection.
- Subsection (d), paragraph (3) – The addition of the Bureau conforms to the change in application processing responsibilities under the GRP No. 2 amendment of section 19826(a).
- Subsection (d), paragraph (4) – The reference to filing an application with the Commission is changed to reference the Bureau to conform to the GRP No. 2 amendment of section 19826(a).

Section 12349

- Subsection (a) – The reference in paragraph (1) to the Commission receiving the application is changed to reference the Bureau in accordance with the GRP No. 2 amendment of section 19826(a). The reference in paragraph (2) to the Commission processing and considering an application is changed to reference processing by the

Bureau and consideration by the Commission to conform to the separation of responsibilities under the GRP No. 2 amendment of section 19826(a).

- Subsection (b) – The references to the Commission receiving the request for an interim license is changed to reference the Bureau in accordance with the GRP No. 2 amendment of section 19826(a).
- Subsection (d) – The references to the Executive Director providing notice to the applicant that an application is complete and accepted for filing and processing the application are changed to reference the Bureau in accordance with the GRP No. 2 amendment of section 19826(a). As the Bureau will receive and process the application, the Bureau will perform the administrative task of notifying the applicant regarding the completeness of the application.
- Subsection (f) – The references to the Commission also receiving notifications are deleted as an unnecessary duplication of reporting in light of the Bureau's investigation responsibilities under the GRP No. 2 amendment of 19826(a).
- Subsection (g) – The reference to the Commission receiving notification is changed to reference the Bureau in accordance with the GRP No. 2 amendment of section 19826(a).

Section 12350

- Subsection (c) – The references to the Commission receiving the application is changed to refer to the Bureau. The Commission's application form is converted to a Bureau form, and the form number and revision date are changed accordingly. These changes conform to the GRP No. 2 amendment of sections 19826(a) and 19864(a).
- Subsection (d), paragraph (1) – The reference to the Commission notifying an applicant that an application is complete and accepted is changed to reference the Bureau. As the Bureau will receive and process the application, the Bureau will perform the administrative task of notifying the applicant regarding the completeness of the application. The Commission's application form number is changed to conform to the conversion of the form in subsection (c). These changes conform to the GRP No. 2 amendment of sections 19826(a) and 19864(a). The last sentence is deleted as the Commission will no longer receive and process applications in accordance with the GRP No. 2 amendment of section 19826(a).
- Subsection (d), paragraph (2) – This paragraph is deleted as the Commission will no longer receive and process applications in accordance with the GRP No. 2 amendment of section 19826(a). Paragraphs (3) through (5) are renumbered accordingly.
- Subsection (d), paragraph (3) [Renumbered as paragraph (2)] – The reference to the Bureau receiving information from the Commission is deleted as the Commission will no longer receive and process applications in accordance with the GRP No. 2 amendment of section 19826(a).
- Subsection (d), paragraph (4) [renumbered as paragraph (3)] – Conforming editorial changes are made, deleting the unnecessary and now inaccurate references to paragraphs (2) and (3).

- Subsection (e), paragraph (2) – The addition of the Bureau conforms to the change in application processing responsibilities under the GRP No. 2 amendment of section 19826(a).

Section 12351

- Subsection (a) – The reference to the Commission receiving the application is changed to reference the Bureau. The Commission's application form number is changed to conform to the conversion of the form in section 12350. These changes conform to the GRP No. 2 amendments of sections 19826(a) and 19864(a).
- Subsection (c) – The references in paragraphs (1) and (2) to the Commission receiving and processing the application and notifying the applicant that the application is complete and accepted for initial processing are changed to reference the Bureau. As the Bureau will receive and process the application, the Bureau will perform the administrative task of notifying the applicant regarding the completeness of the application. The Commission's application form number in paragraph (2) is changed to conform to the conversion of the form in section 12350. These changes conform to the GRP No. 2 amendments of sections 19826(a) and 19864(a). The reference in paragraph (3) to the Commission forwarding the application to the Bureau is deleted as the Commission will no longer receive applications. Paragraph (4) is re-numbered as paragraph (3) accordingly.
- Subsection (d) – The addition of the Bureau conforms to the change in application processing responsibilities under the GRP No. 2 amendment of section 19826(a).

Section 12352

- Subsection (a) – The reference to notifying the Commission regarding employment status is changed to reference the Bureau in light of the Bureau's investigatory and related administrative responsibilities under GRP No. 2. The Commission's application form is converted to a Bureau form, and the form number and revision date are changed accordingly. These changes conform to the GRP No. 2 amendment of sections 19826(a) and 19864(a).
- Subsection (b), paragraph (1) – The Commission's application form is converted to a Bureau form, and the form number and revision date are changed accordingly. The references to the submission of applications to the Commission are changed to reference the Bureau. These changes conform to the GRP No. 2 amendment of sections 19826(a) and 19864(a).
- Subsection (b), paragraphs (2), (3), (4) and (5) subparagraph (B) – The references to issuing a replacement license are either replaced with references to providing a replacement license for clarification, or are deleted where appropriate. The Commission retains the authority and responsibility of approving and issuing licenses, registrations and permits while the Bureau will assume the ministerial, administrative task of printing and distributing (i.e., "providing") the indicia of a license, registration or permit to the applicant, in accordance with the GRP No. 2 amendment of section 19826(a).

- Subsection (b), paragraph (5), subparagraph (A) – The reference to the Executive Director notifying the applicant that the application is complete and accepted for initial processing is changed to reference the Bureau. As the Bureau will receive and process the application, the Bureau will perform the administrative task of notifying the applicant regarding the completeness of the application.

Section 12354

- Subsections (a), (b), (c) and (f) – The references to the Commission or Executive Director receiving and processing applications are changed to reference the Bureau in accordance with the GRP No. 2 amendment of section 19826(a). As the Bureau will receive and process the application, the Bureau will perform the administrative task of notifying the applicant regarding the completeness of the application. The Commission's application form is converted to a Bureau form, and the form number and revision date are changed accordingly to conform to the GRP No. 2 amendment of section 19864(a).

Section 12357

- Subsections (a), (b) and (c) – The references to fee receipt, notice, and accounting by the Commission are changed to refer to the Bureau. The Commission's application form is converted to a Bureau form, and the form number and revision date are changed accordingly. These changes conform to the GRP No. 2 amendment of sections 19826(a) and 19864(a).

Section 12358

- Subsection (a) – The references to the Commission receiving the application and fee are changed to reference the Bureau. The Commission's application form is converted to a Bureau form, and the form number and revision date are changed accordingly. These changes conform to the GRP No. 2 amendment of sections 19826(a) and 19864(a). "California Code of Regulations" is appropriately abbreviated.
- Subsection (d) – The addition of the Bureau is clarifying and conforms to the change in application processing responsibilities under the GRP No. 2 amendment of section 19826(a).
- Subsection (e) – The first sentence is moved to the end of the subsection for better organization and to follow a more logical order. The second sentence is deleted because the Commission no longer receives, reviews, or processes applications. Additional editorial changes are made to add clarity. These changes conform to the GRP No. 2 amendment of section 19826(a).

Section 12359

- Subsection (a) – The references to the Executive Director receiving the application and fee are changed to reference the Bureau in accordance with the GRP No. 2 amendment of section 19826(a). The Commission's application form is converted to a Bureau form, and the form number and revision date are changed accordingly to conform to the GRP

No. 2 amendment of section 19864(a). "California Code of Regulations" is appropriately abbreviated.

- Subsection (c) – The addition of the Bureau is clarifying and conforms to the change in application processing responsibilities under the GRP No. 2 amendment of section 19826(a).
- Subsection (d) – The reference to the Commission performing an initial review is deleted since the Bureau will receive and process the applications pursuant to the GRP No. 2 amendment of section 19826(a). Additional editorial changes are made to add clarity. These changes conform to the GRP No. 2 amendment of section 19826(a).

Section 12370

- Subsections (b) and (e) – The references to submission of application documents to the Commission or Executive Director are changed to reference the Bureau in accordance with the GRP No. 2 amendment of section 19826(a).

Section 12372

- Subsection (c) – The references to the submission of application documents to the Commission are changed to reference the Bureau in accordance with the GRP No. 2 amendment of section 19826(a).

Section 12401

- Subsection (a) – The incorrect reference to subdivision (q) of section 19805 is corrected to subdivision (r). The reference to the reporting of application-related revenue to the Commission is changed to reference the Bureau in accordance with the GRP No. 2 amendment of section 19826(a).

Section 12402

- Subsection (a) – The reference to the Commission also receiving documents is deleted as it is unnecessarily duplicative. The Bureau has the responsibility for investigations under the GRP No. 2 amendment of section 19826(a). It is not necessary that licensees be required to send the same documents to both the Bureau and the Commission. While this amendment is not directly related to GRP No. 2, it is a nonsubstantive editorial and grammatical change that has no regulatory effect.

Section 12403

- Subsections (a) and (b) – The references to the Commission also receiving financial statements documents are deleted as unnecessarily duplicative. The Bureau has the responsibility for investigations under the GRP No. 2 amendment of section 19826(a). It is not necessary that licensees be required to send the same documents to both the Bureau and the Commission. While these amendments are not directly related to GRP No. 2, they are nonsubstantive editorial and grammatical change that have no regulatory effect.

Section 12404

- Subsection (c) – The reference to making reports of transactions involving currency in excess of \$10,000 available for inspection by the Commission is deleted as unnecessarily duplicative. The Bureau has the responsibility for investigations under the GRP No. 2 amendment of section 19826(a). While this amendment is not directly related to GRP No. 2, it is a nonsubstantive editorial and grammatical change that has no regulatory effect.

Section 12464

- Subsection (a) – The reference to the Commission giving notice is deleted as it is not applicable. The Bureau, not the Commission, maintains the list of self-excluded individuals and disseminates that information to licensees, as may be necessary and permitted. While this amendment is not directly related to GRP No. 2, it is a nonsubstantive technical, editorial, and grammatical change that has no regulatory effect.

Section 12480

- Subsection (b), paragraphs (14) and (30) – The references to the Commission approving card-minding devices are changed to reference the Bureau in accordance with the GRP No. 2 amendment of Penal Code section 326.5(p)(3)(A).
- Subsection (b), paragraph (18) – The word “that” is deleted for correct sentence structure.

Section 12492

- Subsections (d) and (e) – The references to submit applications to the Bureau are added for clarity in accordance with the GRP No. 2 amendment of sections 19826(a) and 19864(a), and Penal Code section 326.3(q)(3)(A). The Commission’s application form is converted to a Bureau form, and the form number and revision date are changed accordingly to conform to the GRP No. 2 amendment of section 19864(a).
- Subsection (f) – The reference to the Commission notifying the holder of an interim license is changed to reference the Bureau to conform to the GRP No. 2 amendment of section 19826(a). The sentence concerning evidentiary hearings is restructured for clarity.
- Subsections (g) and (h) – The references to submission of applications to the Bureau are added for clarity in accordance with the GRP No. 2 amendment of sections 19826(a) and 19864(a), and Penal Code section 326.3(q)(3)(A). The Commission’s application form number is changed to conform to the conversion of the form in subsection (d). This change conforms to the GRP No. 2 amendment of section 19864(a).

Section 12496

- The reference to submitting to the Commission a change in location is changed to reference the Bureau in accordance with the GRP No. 2 amendment of section 19826(a).

Section 12500

- Subsections (c), (d) and (e) – The references to the Commission receiving the application are changed to reference the Bureau. The Commission's application form is converted to a Bureau form, and the form number and revision date are changed accordingly. These changes conform to the GRP No. 2 amendment of sections 19826(a) and 19864(a), and Penal Code section 326.3(a)(3)(A). The sentence concerning evidentiary hearings is restructured for clarity.

Section 12503

- Subsections (b), (c) and (d) – The references to submission of applications to the Bureau are added for clarity. The reference to the Commission receiving the application form is changed to reference the Bureau. The Commission's application form is converted to a Bureau form, and the form number and revision date are changed accordingly. These changes conform to the GRP No. 2 amendment of sections 19826(a) and 19864(a), and Penal Code section 326.3(q)(3)(A). The sentence concerning evidentiary hearings is restructured for clarity.

Section 12505

- Subsections (b) and (c) – The references to submission of applications to the Bureau are added for clarity. The references to the Commission receiving the application or providing notice are changed to reference the Bureau. The Commission's application form is converted to a Bureau form, and the form number and revision date are changed accordingly. These changes conform to the GRP No. 2 amendment of sections 19826(a) and 19864(a), and Penal Code section 326.3.

Section 12508

- Subsections (d) and (f) – The references to submissions of audit reports to the Commission are changed to reference the Bureau in accordance with the GRP No. 2 amendment of Penal Code section 326.3(w).
- Subsection (e) – The word “organized” is replaced with “formed” for clearer sentence structure. The reference to submission of records to the Commission is changed to reference the Bureau in accordance with the GRP No. 2 amendment of section 19826(a), and Penal Code section 326.3(w). Because the Commission will continue to be responsible for administering the Charity Bingo Mitigation Fund and receiving from organizations the reimbursement payments mandated by Penal Code section 326.4, language has been added to clarify that those payments shall continue to be made to the Commission concurrent with the quarterly submission of records to the Bureau. This will provide clarification of a specific administrative duty that the Commission will retain. This is a clarifying nonsubstantive change and has no regulatory effect.

Section 12591

- Subsection (b) – Employee classifications that will no longer exist at the Commission are deleted, a new Staff Services Manager III classification is added, and the subsections are

renumbered accordingly. These changes conform to the transfer of positions from the Commission to the Bureau resulting from the implementation of GRP No. 2.

Forms

All relevant Commission forms, as noted above, have been reviewed for conformance with GRP No. 2 and have been converted to Bureau forms. The specific changes to these forms include the following:

- The Commission seal is replaced with the Department of Justice Seal.
- All contact information for the Commission is replaced with contact information for the Bureau. This includes addresses, phone numbers, and websites.
- The CGCC form number and revision date is replaced with a new BGC form number and revision date.
- All references or instructions regarding submission of applications, forms, information or fees to the Commission are changed to references or instructions to submit applications, forms, information or fees to the Bureau.
- Additional technical, grammatical, editorial, and clarifying changes are also included in several forms.

Additional changes, not related to GRP No. 2, have also been made to several forms. In BGC-610 (formally CGCC-610), BGC-620 (formally CGCC-620), and BGC-622 (formally CGCC-622), the tax delinquency notice mandated by Business and Professions Code section 494.5 is inserted. Section 494.5 requires state licensing agencies to include a notice in any licensing application forms informing the applicant that if the applicant's name appears on the lists developed by the Franchise Tax Board and the State Board of Equalization of the top 500 tax delinquencies over \$100,000, the application will be denied or the license suspended. The Commission has no discretion as to whether or not to include this information on its forms, and therefore this addition to these forms is necessary in order to conform to the requirements of section 494.5.

These changes are nonsubstantive and conforming, and have no regulatory effect, as they do not materially alter any requirement, right, responsibility, condition, prescription or other regulatory element of any CCR provision.