



June 18, 2020

TO: ALL CALIFORNIA GAMBLING ESTABLISHMENTS

RE: Reminder Regarding Regulatory Requirements During the COVID-19 Pandemic

The Bureau of Gambling Control (Bureau) has been advised that some gambling establishments have begun implementing measures intended to reduce the transmission of COVID-19. These efforts include modified card tables, restricting the maximum number of patrons allowed to play at a table at one time, and modifying card-dealing procedures.

The Bureau applauds efforts to address the health, safety, and welfare of the gambling establishments' patrons and employees, and encourages the implementation of reasonable and necessary steps to help minimize the impact of COVID-19. However, the Bureau would like to remind gambling establishment owners and operators that the regulations promulgated under the Gambling Control Act must still be followed. This includes, but is not limited to, the following:

- Modifications to card tables (e.g., "extra large" or oversized tables) may implicate changes to the Bureau-approved game rules that will require submittal of a game modification request, where the game rules provide for the use of a standard table or those with specific dimensions or markings. Please review each approved game and its rules to determine whether any modification would require Bureau approval. If a gambling establishment believes that changes to game rules will be required, please send a notification to the Bureau via email at bgcgames@doj.ca.gov identifying the games along with the corresponding BGC ID numbers that will be affected by these changes. The Bureau will work with gambling establishment owners and operators to expedite review of any required approval application to minimize any impacts on the cardrooms' operations.
- Tables that are removed from circulation, or replaced by modified tables, and that are no longer in use, or if kept in use would exceed the maximum number of authorized tables, must be clearly marked as non-operational and kept under continuous video surveillance. (Cal. Code Regs., tit. 4, § 12391, subd. (a)(3).)
- Surveillance of all critical gambling operation activities, such as the gambling establishment premises, patrons, dealers, the placing of wagers, tables, floor banks, the cage, collection of player fees, and the collection of drop boxes, must be maintained. (Cal. Code Regs., tit. 4, § 12396.)

June 18, 2020

Page 2

- Security measures that are impacted by any modifications must be maintained in compliance with the applicable security standards. (Cal. Code Regs., tit. 4, § 12395.)
- Cardroom owners and operators must ensure that any modifications that require revisions to Minimum Internal Control Standards policies and procedures are implemented, and that all changes to the policies and procedures are communicated to employees, as appropriate. (Cal. Code Regs., tit. 4, § 12381.)

Additionally, as the Bureau has previously advised, in order to reduce the potential transmission of COVID-19, the Bureau will temporarily permit licensed gambling establishments to deal player-dealer style games with cards faced up to prevent players from touching cards, if the gambling establishment deems this necessary to protect patrons and employees. Requests for modifications to existing game rules will not be required in order to enact these changes. If a gambling establishment believes it is necessary to enact these changes to game rules, please send a notification to the Bureau via email at bgcgames@doj.ca.gov identifying the games (along with the corresponding BGC ID numbers) that will be affected by these changes, prior to implementing the change. These temporary changes will remain in effect until it is no longer deemed necessary by the Bureau, upon which notice will be sent to the gambling establishment. Please contact the Bureau via the above email address if you have any questions regarding this temporary change.

This notification is intended to serve as a reminder to cardroom owners and operators of their continuing obligations to comply with all laws in the operation of gambling activities during the COVID-19 pandemic, and is not intended to serve as a deterrent to the provision of lawful and safe gaming in the State. The Bureau appreciates your cooperation in our collective commitment to provide a safe environment for the public to participate in controlled gaming.

Sincerely,

Stephanie K. Shimazu
STEPHANIE K. SHIMAZU
Director

For XAVIER BECERRA
Attorney General

cc: Stacey Luna Baxter, Executive Director – California Gambling Control Commission
Cristina Guccione – Communities for California Cardrooms
Joe Patterson, Executive Director – California Gaming Association
Third-Party Providers of Proposition Player Services