



GAMBLING CONTROL COMMISSION

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June 19, 2020

To: All Gambling Establishment Designated Agents  
All Third-party Provider of Proposition Player Services Designated Agents  
All Gambling Business Designated Agents  
All Individuals on Commission Notice List

Re: Economic Impact – Emergency Sanitation Regulations in Response to COVID-19

In response to the COVID-19 pandemic, the California Gambling Control Commission (Commission) is considering the adoption of emergency regulations that would implement sanitation requirements upon the reopening of gambling establishments (cardrooms) in California necessary for the immediate preservation of the public peace, health, safety, and general welfare. The Commission is required to assess the estimated economic impact (cost and savings) that the proposed regulations may have on affected business and individuals. In order to do that, we need your assistance. This letter is a request for economic impact information from cardrooms, third-party providers of proposition player services (TPPPS), and gambling businesses concerning the proposed emergency regulations.

Before the Commission can start the emergency rulemaking process, we are required to submit the completed Economic and Fiscal Impact Statement (STD. 399) to the Department of Finance. The STD. 399 includes a requirement to identify the costs that businesses and individuals may incur to comply with the regulations.

There are four primary areas of the proposed regulations that may have an economic impact on a cardroom, TPPPS, or gambling business:

- Staffing cost to develop an emergency sanitation plan that complies with the minimum requirements of proposed Section 12371 or 12292
- Staffing costs to implement emergency sanitation plan (training, additional cleaning, etc.)
- Weekly and one-time material costs to implement emergency sanitation plan
- Potential loss in cardroom gaming revenue that may result from complying with the modified requirements concerning the operation of gaming tables in proposed Section 12371(a)(5)

To assist us in assessing the potential economic impact, we need Tabs A and B of the attached spreadsheet to be completed for each cardroom/TPPPS/gambling business and returned via email to [lawsandregs@cgcc.ca.gov](mailto:lawsandregs@cgcc.ca.gov). Please rename the spreadsheet file name with the name of the cardroom/TPPPS/gambling business it represents. If you represent or own more than one cardroom/TPPPS/gambling business, please provide a separate spreadsheet for each. In your response, please include the name and telephone number of a contact person in case we have any follow up questions.

To allow the Commission to commence the formal emergency rulemaking process, we request that this information be received by Commission staff by **June 26, 2020**.

Enclosed are drafts of the proposed emergency regulation text reference.

We appreciate your assistance during this difficult time. Questions concerning this matter may be directed to Adrianna Alcalá-Beshara, Deputy Director of Legislative and Regulatory Affairs, at (916) 274-6069 or [aalcalabeshara@cgcc.ca.gov](mailto:aalcalabeshara@cgcc.ca.gov).

Sincerely,

*Adrianna Alcalá-Beshara*

Adrianna Alcalá-Beshara  
Deputy Director  
Legislative and Regulatory Affairs Division

Enclosures: Economic Impact Survey Spreadsheet  
Draft Emergency Regulation Text