Commissioners:

As you are aware, we received an additional comment from Mr. Fried outside of the rulemaking public comment period. This comment need only be included as part of the record and does not need to be summarized or responded to in the Final Statement of Reasons. However, staff did want to provide some information for you to have alongside the comment should you wish to review it:

- Nevada's definition of an employee eligible for gaming registration is vastly broader than California's current definition. For example, Nevada's definition also includes individuals that don't necessarily receive work permits from the Commission, such as promoters and various other types of vendors and/or distributors;
- Registration, as provided by the Gaming Control Board, is a second layer approval for gaming employees. Gaming employees also receive work cards, also known as work permits, from their local jurisdiction;
- The registration application for Nevada does ask for 10 years employment history;
- Due to Nevada's online application system, their registration team does not require work time to input applications. Applicants are able to enter in their own information and provide where their fingerprints were taken so their investigator can access their record of arrests and prosecutions;
- The Gaming Control Board application form also asks for arrests, not just convictions;
- The Gaming Control Board requires employers to report certain derogatory gaming employment events; such as violations of any gaming laws and various types of theft; and,
- As made clear in Mr. Fried's attachment, the 15 individuals on the registration team (plus one manager) are supported by additional investigators.