

RESPONSIBILITIES FOR KEY EMPLOYEES IN CALIFORNIA CARDROOMS



CALIFORNIA GAMBLING CONTROL COMMISSION

In California cardrooms, Key Employees are held to a higher standard than non-key employees. In fact, key employees are considered part of “the house,” and are subject to special reporting requirements. Key Employees are required to comply with the Gambling Control Act (“Act”), and regulations issued by the California Gambling Control Commission (Commission) and the Bureau of Gambling Control (Bureau). Full copies of the Act and regulations are available [on the Commission’s website](#).

Licensure

Be sure to wear your Key Employee badge in a visible and conspicuous manner while on duty.

Interim Key Employee License

- Work permit holders may begin to work as an Interim Key Employee if an [Interim Key Employee application](#) is submitted within 10 days of hiring, and an [initial Key Employee application](#) within 30 days.
- An Interim Key Employee License will be either granted or denied within 15 working days.
- Valid for up to 2 years while the regular Key Employee application is being investigated and reviewed.
- Authority: [4 CCR §12354](#)

Key Employee License

- A valid Key Employee License is required before performing the work of a key employee, with two exceptions:
 1. Employees with a pending Interim Key Employee application filed within 10 days of hiring and waiting for decision;
 2. Employees working for corporations may begin working as a key employee if they submit their application to the Bureau within 30 days of assuming the key employee position.
- The Commission will act on the application within 120 days after the Bureau’s report is submitted to the Commission. The processing times may be exceeded under certain circumstances.
- Authority: [Business and Professions Code §§19883, 19855](#); [4 CCR §12350](#)

Key Employee License Renewal

- Licenses must be renewed every 2 years.
- File a [renewal application](#) with the Bureau within 120 days of the current license’s expiration date.
- It is YOUR responsibility to ensure that your renewal paperwork is timely filed with the Bureau! Do not rely on a designated agent or third party for the accuracy, completeness, or timeliness of your renewal application.
- Authority: [4 CCR §§12350\(b\)](#) and [12351](#)

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Reporting

Key Employees must notify the Bureau in writing of the following within 5 days:

- Known possible violations of the Act or Commission regulations;
- After obtaining knowledge, notice, or contacting law enforcement for suspected violations of the Act and/or regulations and specific violations of law. See [4 CCR §12395\(a\)\(3\)\(A\)](#) for a list of specific violations that must be reported;
- Any cheating reported by a registrant or licensee.
- Authority: [11 CCR §2052\(c\)](#); [4 CCR §§12395\(a\)\(3\)\(A\)](#), [12200.7\(17\)](#)

Key Employees must notify the Bureau in writing of the following within 10 days:

- Any legal dispute between the primary owner of a TPPPS company and the house or Key Employee;
- Arrest of a TPPPS registrant in the gambling establishment;
- Removal of a TPPPS registrant from the premises by a peace officer or the house;
- A dispute between a TPPPS registrant and patron that results in a peace officer report and removals from the premises.
- Authority: [4 CCR §12200.7\(16\)](#); [Business and Professions Code §19805\(t\)](#)

Change in Employment

- Notify the Bureau within 10 days of acceptance or termination of employment in a cardroom.
- Remember, your Key Employee License is portable; your license is tied to you, not the cardroom. Keep the Bureau updated on your place(s) of employment.
- Authority: [4 CCR §12352\(a\)](#); [Business and Professions Code §19854\(c\)\(2\)](#)

Key Employee On Duty

- At least one licensed Key Employee must be on the premises during the gambling establishment's operating hours to supervise and ensure compliance with the Gambling Control Act and the Bureau's and Commission's regulations.
- Authority: [11 CCR §2050](#) & [4 CCR §12391\(b\)](#)

Problem Gambling Training

- Key Employees are required to complete an annual problem gambling training.
- New employees must receive problem gambling training within 60 days of receiving their license, or the employee's start date, whichever is later.
- Authority: [4 CCR §12462 \(b\)\(1\) & \(c\)\(3\)](#)

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Excluded/Restricted Patrons

- Take prompt action to eject people on the statewide involuntary exclusion list and patrons who attempt entry after requesting to be restricted or excluded.
- Notify the Bureau of any entries or attempts to enter by patrons on the involuntary exclusion, the self-restriction, and/or self-exclusion lists.
- Authority: [4 CCR §§12362\(q\), 12463, 12464](#)

Prohibitions

Key Employees are prohibited from:

- Holding the player-dealer position in the gambling establishment they work in;
- Having any interest in funds wagered, lost, or won in the gambling establishment they work in;
- Retaliating against others for contacting the Commission, Bureau, or other agency;
- Providing proposition player services and working as a key employee in the same gambling establishment.
- Authority: [Business and Professions Code §§19805\(c\), 19805\(t\), 19984\(a\); Penal Code 330.11; 4 CCR §12200.7\(b\)\(11\), \(d\) & \(e\)](#)