

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.

Temporary Key Employee License

- Applicants may request a Temporary Key Employee License by checking the “Additional Request for a Temporary License” box in Section 2 of [the Application for Employee Category License](#).
- If an applicant holds a valid Commission work permit or Third-Party Provider of Proposition Player Services (TPPPS) worker license, the Bureau will provide a recommendation to the Commission regarding the temporary license within 15 days from receipt of the application. If the applicant does not hold an aforementioned permit or license, it’s 15 days from the Bureau’s receipt of the applicant’s fingerprint results.
- Valid for up to 2 years while the regular Key Employee application is being investigated and reviewed.
- Authority: [4 CCR §§12124, 12122\(c\)\(2\)](#)

Key Employee License

- A valid Key Employee License is required before performing the work of a key employee, with one exception: 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 Bureau is required to act upon an application within 180 days of receipt of a completed application. However, there are exceptions which may extend that time period.
- Authority: [Business and Professions Code §§19883, 19855, 19868](#)

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 any other person for the accuracy, completeness, or timeliness of your renewal application.
- Authority: [Business and Professions Code §19876](#)

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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 TPPPS category licensee.
- Authority: [11 CCR §2052\(c\)](#); [4 CCR §§12395\(a\)\(3\)\(A\)](#), [12270\(b\)\(17\)](#)

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

- Any legal dispute between the TPPPS business licensee and the cardroom business licensee;
- Arrest of a TPPPS category licensee in the gambling establishment;
- Removal of a TPPPS category licensee from the premises by a peace officer or the cardroom business licensee;
- A dispute between a TPPPS category licensee and patron that results in a peace officer report and removals from the premises.
- Authority: [4 CCR §12270\(b\)\(15\) & \(b\)\(16\)](#)

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 §12110](#); [Business and Professions Code §19854\(c\)\(2\)](#)

Key Employee On Duty

- At least one licensed Key Employee or owner licensee 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 §12270\(b\)\(11\) & \(d\)](#)