



October 27, 2025

California Gambling Control Commission
Joshua Rosenstein, Legislative and Regulatory Specialist
Legislative and Regulatory Affairs Division
2399 Gateway Oaks Drive, Suite 220
Sacramento, CA 95833-4231

Re: Comments on Proposed Regulations – Multi-Owner Type Licenses (CGCC-GCA-2025-03-R)

Dear Mr. Rosenstein:

On behalf of the California Gaming Association and its member cardrooms, we appreciate the Commission's effort to streamline licensing for individuals and entities that hold ownership or officer interests in multiple cardrooms. The current system forces duplicative applications, reviews, and license numbers, creating unnecessary costs and administrative inefficiency for both the industry and the state. We support the intent of the proposed multi-owner framework and offer the following refinements to ensure the regulations deliver meaningful efficiency, fairness, and cost savings.

First, "good standing" should be defined based on final Commission action—such as a suspension, revocation, or denial—rather than pending or unresolved matters. Treating a referral or ongoing hearing as disqualifying undermines due process and penalizes licensees before a final determination. Similarly, fees for the new license should reflect actual administrative workload, not exceed the total currently paid for separate applications. A consolidated license should save time and money, not cost more.

Finally, we recommend adopting a true "one person, one license, one renewal packet" model and a clear transition process for existing multi-establishment licensees. Individuals should be able to list multiple cardrooms under a single license and renewal cycle, consistent with the Legislature's directive in Business and Professions Code section 19851. The multi-owner license is a smart modernization that will reduce redundant filings and allow the Commission to focus on genuine suitability issues.

In closing, we appreciate the Commission's work on this reform and look forward to continued collaboration to make the multi-owner license process efficient, fair, and consistent with statute.

Sincerely,

A handwritten signature in black ink, appearing to read "Kyle Kirkland".

Kyle Kirkland
President
California Gaming Association



THE COMMERCE
CASINO & HOTEL

October 27, 2025

Joshua Rosenstein, Legislative and Regulatory Specialist
Legislative and Regulatory Affairs Division
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E-mail: jrosenstein@cgcc.ca.gov

Re: Comments on Proposed Regulations – Multi-Owner Type Licenses
(CGCC-GCA-2025-03-R)

Dear Mr. Rosenstein:

On behalf of The Commerce Casino and Hotel (“Commerce”), I am submitting the following comments regarding the proposed regulations establishing a multi-owner type license. Commerce strongly supports the Commission’s effort to streamline the owner licensing process. The lack of a multi-owner framework has imposed unnecessary duplication, adversely impacted the normal renewal process and added costly administrative requirements for licensees who hold different titles or roles in the same cardroom as well as interests in multiple cardrooms. Commerce has, as recently as several months ago, had an individual with a valid owner type license undergo a years-long background investigation for a different owner type license at the same cardroom resulting in substantial burden for both the applicant and the Bureau as well as negatively impacting what was an otherwise routine renewal process. Establishing a clear, single license structure for multi-ownership is a change that will make regulatory oversight and the licensing process more efficient.

While we support this regulation, below we address some provisions that warrant review to ensure clarity and fairness. The proposed revisions are intended to refine the regulatory text so that it achieves its purpose.

I. Definition of “Good Standing” (Section 12002(ac), 12054)

The definition of “good standing” disqualifies any licensee who is the subject of a pending accusation or hearing, or an excluding condition. This approach effectively treats unresolved allegations as proven violations, which is contrary to principles of administrative due process. Licensees can be referred to an evidentiary hearing for the simple fact that the Commission would like additional information on a topic, or to allow more time to resolve an issue. . The issue may have no bearing on suitability, yet under the current draft, the mere

existence of a hearing or accusation would strip that owner of “good standing” and preclude them from applying for or renewing a multi-owner license. This would unfairly penalize the licensee before the Commission ever makes a finding. Similarly, a licensee may have an accusation pending which, under the current definition, would prohibit its eligibility for a multi-owner license even though the Bureau has not proven its case. The definition should instead focus on final disciplinary actions and leave discretion to the Commission to determine whether unresolved matters materially affect suitability. We are aware that draft section 12054 allows the Commission to identify those referrals that do not impact eligibility, but the language should be reversed. The presumption should be that a referral to a hearing or an unproved accusation do not automatically disqualify someone from applying for or renewing a multi-owner license and only in those cases where the Commission affirmatively identifies an issue as a disqualifying concern will that person be ineligible.

Proposed Revision:

Section 12002(ac). “Good Standing” means a status for a renewal cardroom endorsee license or renewal TPPPS endorsee license, which does not have an excluding condition, ~~does not have a pending accusation or pending evidentiary hearing~~ has not had any current renewal application denied pursuant to paragraph (3) of subsection (a) of Section 12054, and has not been revoked or suspended pursuant to Section 12554. For purposes of this definition “excluding condition” means:

(1) A ~~condition imposed~~ final determination on the renewal cardroom endorsee license or renewal TPPPS endorsee license expressly preventing good standing pursuant to paragraph (4) of subsection (a) of Section 12054, paragraph (4) of subsection (b) of Section 12066, or paragraph (4) of subsection (d) of Section 12554;

(2)(A) Failure to comply with ~~Any~~ condition that requires the reporting on and/or resolution of debt(s);

Section 12054(a)(4). Elect to hold or retract an evidentiary hearing in accordance with Section 12056 and, for a renewal application, issue an interim renewal license pursuant to Section 12035. The Commission will identify those issues for which it requires additional information or consideration related to the applicant's suitability. Unless otherwise determined by the Commission, an election to hold an evidentiary hearing will not prevent an owner category license’s good standing.

II. Additional Fees (Section 12090)

The proposed regulations would require a licensee to pay an additional fee for each acquired interest when the purpose of the regulations is to reduce administrative burden. For clarity, the regulations should specify that the application fee for a multi-owner type license is \$821, the fee for both a single owner license and the additional cost of the multi-owner type application.

Joshua Rosenstein, Legislative and Regulatory Specialist

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Proposed Revision:

Section 12090. Multi-Owner Type License (~~additional fee~~): \$657 \$821

Conclusion

We appreciate the Commission's work on this regulation as the creation of a multi-owner license is a significant reform that will ultimately enhance efficiency in the licensing process for both licensees and the Commission. The revisions proposed herein are intended to ensure the new process fulfills its purpose with clarity and consistency. Commerce supports the adoption of the proposed regulations, with the modifications described herein.

Respectfully submitted,

/s/

Baro Covell

Associate Counsel

The Commerce Casino & Hotel.

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October 24, 2025

California Gambling Control Commission
ATTN: Josh Rosenstein, Legislative and Regulatory Specialist
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Sacramento, CA 95833-4231
lawsandregs@cgcc.ca.gov

Re: Multi Owner Licensing Regulations

Dear Josh:

On behalf of the Oaks Card Club and California Grand Casino, I am submitting the following comments on the proposed regulation.

We strongly support the adoption of this regulation, which follows a recommendation from GPAC in 2022 to remove the need for duplicate licensing, whereby an individual has to be licensed repeatedly, for example when their ownership interest is placed in trust, they assume a new role in the same licensed business, or an interest is transferred to a person who is already licensed. This practice costs the applicants and regulators significant time and resources. This also causes delays for all the other license applications and background investigations. Every month that passes, more individuals are caught up in this vortex and we urge you to act promptly.

To provide one example, I represented a family who had to be licensed repeatedly for a small non-management interest in a cardroom. The mom had been licensed for years as an individual owner – and applied for new licensing again in 2013 when she formed a trust and became the trustee. Her husband had also applied in 2013 to be a trustee, but died two days before the Commission finally issued the license in 2015. Then as mom declined, her three children applied to be the successor trustees of mom's trust, which licenses were issued in 2018. In 2020, just two years later, mom passed away and the three children had to turn around and apply again for licensing when the interest passed to their individual trusts. Four family members each had to be licensed twice, as short as two years apart. One of the children was a part time nurse and full-time care giver to her son, one was a part-time public-school music teacher left unemployed during COVID, and the third child was not working. None of them were high income individuals, but they had to pay for repeated licensing.

A survey of other states with much larger commercial casinos showed that no other state gambling regulator requires duplicate licensing and a new background investigation when an already licensed individual becomes a trustee.

The Legislature adopted AB 1271 in 2023 to specifically authorize the Commission to remedy this practice by adopting regulations that can waive application requirements and the need for new background investigations for licensed persons in good standing.

We have two comments on the proposed draft.

1. The definition of “Good Standing” in section 12002 (ac) (2) (A).

Often the Commission may require a person with a disputed or delinquent debt to report the status of the debt periodically to the Bureau. This does not mean the person lacks the appropriate character for “good standing” especially where only progress reporting is required. The person may be on a payment plan and current with their payments but still reporting. The only ground for finding the absence of good standing should be being out of compliance with the condition. Otherwise, the applicants may be compelled to settle contested debts just to avoid the cost of duplicate licensing. We suggest the following change:

(ac)(2) (A) Any condition that requires the reporting on and/or resolution of debt(s) where the applicant is not in compliance with the condition;

2. Supplemental Form CGCC-CH-2-07 Section 10 (I)

The proposed regulation would amend form CH-2-07, Owner’s Supplemental Information. There is an issue with that form unrelated to multi-owner licensing, but since the form is being amended, here is the issue. (We have no objection to deferring action on this issue to a later regulatory proceeding since this issue concerns supplemental information for initial applications rather than multi-owner licensing.)

Section 10(I): Do you have any agreements or contracts with any party, other than the Bureau-approved TPPPS contract? ¹

GPAC previously recommended that this question be clarified and narrowed. Applicants may have many household and personal agreements: cell phone contracts, health, auto, renter’s or homeowner’s insurance, tuition agreements, health club agreements, credit card agreements, etc.... Taken literally this question would mean an applicant would have to list every household and personal recurring service or good, and even some one-time personal activities.

In addition, any applicant or endorsee may also have dozens of business contracts that are unrelated to the application. If the person is a dentist, they may have a commercial office lease, dozens of supply contracts, agreements with hygienists and insurance agreements, etc... and may have 200 customer agreements. If the endorsee is a general contractor, they may have dozens of construction or remodeling agreements, business insurance, lumberyard and material supplier

¹ This question repeats on the other supplemental forms, such as Key Employee Form CH2-08 10(H).

accounts, agreements with subcontractors etc... If the applicant is a music teacher, they may have dozens of contracts with students and families.

Moreover, this question overlaps with and duplicates several other sections of the application. With regard to non-gambling business interests, the supplemental background form already addresses that in section 9, where the applicant has to disclose any such business interests for the last ten years. In addition, the supplemental financial schedules will contain information on other investment or business activities. *The Bureau can ask for follow up information with regard to those business activities identified in section 9 or on the schedules that are not gambling related.*

We suggest this question be changed to:

Do you have any agreements or contracts with any party relating to any interest in gambling activities, with any other Commission licensed person or entity, with any person or entity denied a license by the Commission, or any agreements or contracts relating to any business or investment activities not disclosed either in section 9 of this form or in schedules A-K, other than the a Bureau-approved TPPPS contract?

Thank you for your consideration of these comments. We urge you to prioritize this regulation and to promptly complete the consideration and adoption of the regulation.

Sincerely,

/s/

David M. Fried

ELEVATION

October 27, 2025

Via Email to jrosenstein@cgcc.ca.gov; lawsandregs@cgcc.ca.gov

Mr. Joshua Rosenstein
Legislative and Regulatory Specialist
Legislative and Regulatory Affairs Division
California Gambling Control Commission
2399 Gateway Oaks Drive, Suite 220, Sacramento, CA 95833-4231

RE: Multi-Owner Licensing Regulation

Dear Mr. Rosenstein:

On behalf of Elevation Entertainment Group; King's Casino Management Corp. dba The Saloon at Stones Gambling Hall and The Tavern at Stones Gambling Hall; and Stones South Bay Corp. dba Seven Mile Casino, I am submitting the following comments on the proposed regulations.

We strongly support the adoption of regulations to remove the need for duplicative licensing and applications. This practice costs significant time and resources to review redundant information. We submit a total of 33 to 36 applications for the above referenced cardrooms, 11 to 12 per cardroom license, which results in 63 endorsee license numbers. The issuance of this many licenses for the same entities and individuals is unnecessary and duplicative; therefore, we appreciate the proposals to eliminate this redundancy.

With the above in mind, we provide the following comments:

Revise the Definition of “Good Standing” (Section 12002(ac), 12054).

We join in the comments submitted by the Commerce Casino regarding the proposed revisions to the definition of “good standing”. As noted, inclusion of a mere referral improperly assumes that the licensee has fallen out of good standing without proper due process. The proposed definition of good standing creates ambiguity. Basing the determination only on a final decision creates consistency in the application of the rule.

Therefore, we respectfully request the definition is amended to apply only to final determinations on licenses or applications.

The License Fee Should be the Same for Each Application (Section 12090. Schedule of Fees Required for Applications, Approvals, and Registration).

The proposal adds a fee for Multi-Owner Type License which is more expensive than filing individual applications. Currently, as an officer of the company, I submit a single application to be endorsed on the Cardroom License for each cardroom license. Therefore, I submit three separate applications and pay a total of \$492. Assuming I could complete only a

single application (which is unclear as explained below), that **one** application for the same number of licenses and positions would require a payment of \$657, so it would **cost \$165 more** to process the application.

The point of the enabling legislation is to reduce paperwork and processing time, this equates to less work for the Commission and Bureau staff, not more. With the new ability to file a single document and select Multi-Owner Type License, there is no basis to conclude additional administrative work is created that makes the intake process four times more expensive, when the agency is processing less paperwork.

We submit that the application fees should remain - \$164.

Revise the Regulations to Permit for a Singular Initial or Renewal Application for a Person or Entity Affiliated with More than One Position or Gambling Establishment (Section 12114. Renewal License Applications; Required Forms.)

Business and Professions Code section 19851 states, in pertinent part:

(c) Notwithstanding any other law, the commission may adopt regulations, for any applicant who possess a state gambling license in good standing as determined by the commission, to waive any applicable requirement, including, without limitations, any of the following:

- (1) The requirement that an application be accompanied by supplemental forms pursuant to Section 19865.
- (2) The requirement that an application be accompanied by a deposit pursuant to Section 19867.
- (3) The requirement that an investigation be performed by the department.

(d)(1) The commission shall adopt regulations implementing a new owner license type that allows for a person or entity to be endorsed on the license certificate of multiple gambling enterprises.

(2) The regulations shall establish a process for a person or entity endorsed on the license certificate of multiple gambling enterprises to request at the time of submittal of an application for license renewal that their existing endorsements be converted to the new owner license type, provided that the applicant's current state gambling licenses are held in good standing, as determined by the commission.

(3) To the extent feasible, the regulations shall allow individuals or entities with the new owner license type to renew all of their endorsements on the license certificates of multiple gambling enterprises with a single application for renewal. Notwithstanding this paragraph, if the license certificate of a gambling enterprise ceases to be valid, any endorsement thereon of an individual or entity with the new owner license type shall be invalid.

The above enabling legislation makes clear the intent is to reduce the number of applications filed. Further, there is nothing that requires unique license numbers for each time an individual is endorsed onto a gambling enterprise's license. Rather, it merely requires that the person or entity required to be endorsed has a license that is placed onto the gambling enterprise's license certificate.

As proposed, the regulations do not permit for an owner licensee to renew all of their endorsements for multiple gambling enterprises with a single application. As framed, we would likely still be required to file 36 applications. It is possible we could reduce the number of submissions to 24, because The Saloon at Stones Gambling Hall and The Tavern at Stones Gambling Hall are currently set for renewal at the same time, but it is not clear from the documents that we would be able to bypass or otherwise submit a single application for each individual.

We propose the regulations' Application for Owner Category License CGCC-CH2-05 provide a section for the individual to mark Multi-Owner Licensee and then list the establishments and positions the person or entity has for each of those gambling establishments. We propose there should be a section that states something to the following effect:

Do any of the persons required to be endorsed as licensees already have an Owner License granted by the Commission?

Yes No

If yes, list the name and license number associated with each individual or entity. _____.

If the individual has an existing license in good standing that has not reached its two (2) year renewal date, then they should not be required to file additional documentation.

In this manner the Cardroom Licenses application would designate the individuals or entities that are affiliated with multiple cardrooms and have already submitted and been approved. Like most other licenses within the state (State Attorney Bar licenses, Drivers licenses, CPA licenses, Nursing license, Key Employee Licenses, etc.) there is a single number affiliated with the person that is attached to each gambling establishment in which they have a role. This also ensures, that all documentation for a particular individual is kept in one location to avoid duplicative or lost records because documentation was submitted and filed in different locations.

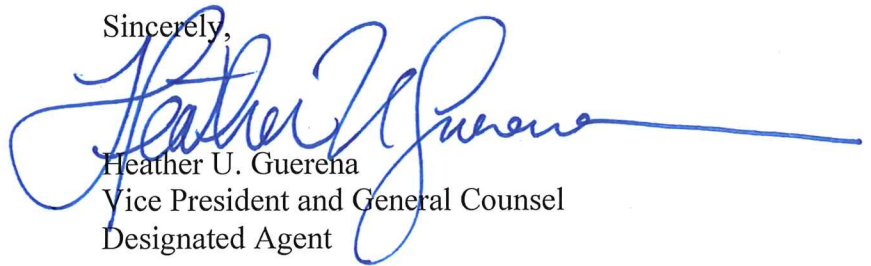
There is nothing within Section 19851 which requires the issuance of multiple distinct or unique license numbers to the same individual. It merely states that the individual must be licensed and that license is endorsed onto the cardroom license. Allowing a single application for an individual does not eliminate the Commissions ability to evaluate the suitability of the applicant, as all of the information is still available in the single multi-owner type license. Therefore, it is consistent with the Act and the legislative intent to streamline the licensing process.

Implementation for Existing Licenses with Multiple Licenses

We propose that the regulations should contain a procedure to either align the existing licensing applications to allow for individuals/entities who are already licensed and seeking renewal to do so in a single renewal, or some other procedure to allow the applications to be reviewed simultaneously. Without direction on how existing persons with multiple licenses should complete a singular license renewal application, it is difficult to understand how the process will become streamlined.

Should the Commission need further discussion regarding the practicality of these matters, we respectfully request a hearing to allow for a dialogue regarding the practical implications of how application processing occurs.

Sincerely,



Heather U. Guarena
Vice President and General Counsel
Designated Agent



October 21, 2025

Joshua Rosenstein, Legislative and Regulatory Specialist
California Gambling Control Commission
2399 Gateway Oaks Drive, Suite 220
Sacramento, CA 95833

Re: Multi-Owner Type Licenses – CGCC-GCA-2025-03-R

Dear Joshua Rosenstein:

The Department of Justice, Bureau of Gambling Control (Bureau) has reviewed the California Gambling Control Commission's (Commission) draft regulations concerning Multi-Owner Type Licenses. We respectfully submit the following comments for consideration. Proposed modifications to the regulatory text are indicated with an underline or by strikeout.

California Code of Regulations, title 4, Section 12002. General Definitions.

Subject: Subdivision (ao) - Definition of Pending Evidentiary Hearing (Page 3)

The text in subdivision (ao) provides a definition for "Pending Evidentiary Hearing". The Bureau seeks clarification on whether referral to an evidentiary hearing for additional time to complete a pending background investigation prevents "good standing" as defined in Section 12002 subdivision (ac).

Chapter 1: Appendix A. Amended Forms.

Subject: Application for Appointment of Designated Agent Form [CGCC-CH1-04] (Page 11)

The Bureau suggests the following amendments to Section 2 to assist the Bureau's application review process:

- Add a checkbox for "Yes" and a checkbox for "No" to the "Name of Designated Agent" section to distinguish if a Designated Agent represents the applicant.
- Add a checkbox to the "Relationship to Applicant" entry field next to the word "Other" for consistency.

Chapter 2: Appendix A. Amended Forms.

Joshua Rosenstein, Legislative and Regulatory Specialist

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Subject: Application for Owner Category License and Multi-Owner Application (Page 17)

The Application for Owner Category License has been revised to consolidate Owner Category License and Multi-Owner License application content into a single form. The Bureau recommends separating these into two distinct applications, as combining them may create confusion among applicants. Please note that the Bureau will need a minimum of three months to digitize the new form after the effective date of this regulation. If possible, providing a notice in advance would be appreciated.

Chapter 2: Appendix A. Amended Forms.

Subject: Application for Owner Category License
Section 1(Page 18)

The text in subdivision (IV) provides the question “Do you believe you hold a renewal cardroom business license or renewal TPPPS business license, as applicable, currently in good standing?” The Bureau recommends a yes or no answer to the statement to clarify and simplify the question to avoid misinterpretation.

~~IV. DO YOU BELIEVE YOU HOLD A RENEWAL CARDROOM BUSINESS LICENSE OR RENEWAL TPPPS BUSINESS LICENSE, AS APPLICABLE, CURRENTLY IN GOOD STANDING?~~

IV. IS YOUR LICENSE IN GOOD STANDING AS DEFINED IN CCR, SECTION 12002?

Subject: Application for Owner Category License
Section 7 (Page 21)

The text in subdivision (7) provides instructions for additional required items, including supplemental background information forms. The Bureau recommends the following amendments to clarify that a supplemental form is not required if the applicant is a multi-owner licensee:

“* A completed Supplemental Background Information Form is not required if the applicant is a multi-owner licensee.”

Joshua Rosenstein, Legislative and Regulatory Specialist

October 21, 2025

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Thank you for considering our comments. Please contact Staff Services Manager I Andreia McMillen at Andreia.McMillen@dca.ca.gov if you have any questions.

Sincerely,


YLANDA MORROW
Bureau Director

For ROB BONTA
Attorney General

ROBB & ROSS

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October 27, 2025

Mr. Joshua Rosenstein
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2399 Gateway Oaks Drive, Suite 220
Sacramento, CA 95833-4231

Re: Comments on Multiple Owner-Type Licenses Regulations
CGCC-GCA-2025-03-R

Dear Mr. Rosenstein:

I write on behalf of Artichoke Joe's with comments on the proposed regulations referenced above.

First a general comment. The regulations are not clear what a multiple owner-type license is or in what situations a multiple owner-type license will be available. There are at least two possible situations. One is where a person has ownership interests in multiple cardrooms. This is clearly required by the Legislative amendments to section 19851. The other situation is where a person holds multiple owner licenses for a single cardroom. This situation is not clearly required by the statute but seems to be covered given the amendment to Section 12112(g) which would excuse submission of supplemental application forms if the person already holds an endorsee license. We suggest that the term "multi owner-type license" be defined in section 12002(al) as a license issued to a person who (1) holds owner licenses either at more than one gambling establishment or more than one TPPPS, or (2) holds more than one owner license at a single gambling establishment or single TPPPS.

12002. General Definitions

(n) Cardroom multi-owner license

This regulation is not really a definition. Rather it provides a substantive rule that the license term of the multi-owner license period will determine the license term of all other cardroom endorsee licenses held by the licensee.

Mr. Joshua Rosenstein
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(a) Multi-owner type license

This regulation is not really a definition. Rather, it just identifies the two types of licenses that constitute multi-owner type licenses. If the definition of Multi-owner license were defined as suggested above, that would cure this problem.

(bb) TPPPS multi-owner license

This regulation is not really a definition. Rather it provides a substantive rule that the license term of the multi-owner license period will determine the license term of all other TPPPS endorsee licenses held by the licensee.

12054. Consideration at a Commission Meeting

The proposed addition to this regulation would provide that an election by the Commission to hold an evidentiary hearing on an application would negate an owner category licensee's good standing unless the Commission provides otherwise. The ISOR reasons that on such election an applicant's "suitability for licensure has been called into question." However, not all referrals to an evidentiary hearing are because of questions about suitability. Rather, in recent years referrals are sometimes made simply because the prior license has been extended the maximum 180 days allowed in section 19876(c) and the only option is to make the referral. The cause of this could be as simple as the Bureau was backlogged. In those cases, the applicant should be considered to remain in good standing. Therefore, we suggest that the presumption be deleted, and that qualification of an owner licensee for a multi-owner license be determined on a case-by-case basis.

Application for Owner Category License Form

In Section 1, under Cardroom Endorsee License and TPPS Endorsee License, there are lists of types of persons who need to be licensed. Limited partners are identified, but not general partners. We suggest identifying both.

In section 2, question 5 asks if annual source of income has increased more than \$25,000 per year. The instructions exempt income from "stocks, inheritance, or interest earned." This is not very clear. What if the income is from real estate

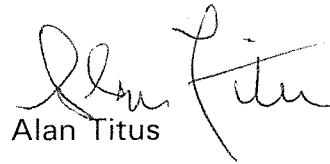
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investment? Why would income from inherited real estate be exempt but income from real estate purchased by the the licensee not be? Also the \$25,000 number seems arbitrary and fails to take into account relative wealth. If someone is worth \$50 million, their income from savings can be expected to increase millions of dollars a year. \$25,000 is 1/20th of one percent. If someone is worth only \$1 million, \$25,000 is 2.5%, much more significant. This reporting requirement should be refined and not be so arbitrary.

* * *

We appreciate your consideration of these comments.

Sincerely,


Alan Titus