



# California Nations Indian Gaming Association

2150 River Plaza Drive, Suite 1080  
Sacramento, CA 95833  
Tel: 916-448-8706 Fax: 916-448-8758

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Mr. Wayne Quint, Jr., Bureau Chief  
Bureau of Gambling Control  
Department of Justice  
PO Box 168024  
Sacramento, CA 95816

Dear Mr. Quint:

On behalf of our 34 member tribes, the California Nations Indian Gaming Association appreciates this opportunity to comment on the Bureau's proposed amendments to regulations concerning collection fees in California cardrooms.

We urge the Bureau to adopt amended regulations that require compliance with state law, which except in very limited circumstances requires all players in a game to pay collection fees at the same rate for the same level of wager.

Any waiver of collection fees should comply with the Penal Code, which only permits the fee to be reimbursed when the player receives no action on his hand or when a hand folds and there is no betting. The fixed collection fee should increase in general proportion to the amount wagered, but should not be a percentage of the wager or winnings. Nor should the fee be so small as to effectively avoid the statutory fee requirement.

Each player's fees should be paid from the player's own funds, and a third-party provider of proposition players services should not be allowed to pay the fees for the other players at the table, as is currently the case in many California cardrooms.

Thank you for considering our comments.

Sincerely,

Daniel J. Tucker, Chairman

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