



**SENT VIA EMAIL ONLY**

December 17, 2019

**Susanne George**

Department of Justice

Division of Law Enforcement

Bureau of Gambling Control

[BGC\\_Regulations@doj.ca.gov](mailto:BGC_Regulations@doj.ca.gov)

Dear Ms. George,

***I am writing you in opposition to the proposed concept language relating to Rotation of Player-Dealer Position.*** Given the limited noticing, our full Council has not been able to take a formal action on the matter; my comments reflect my position as Council member only.

Currently, as I understand it, a player has the **option** to “be the bank” in a prescribed manner; likewise, if a player does not have the financial resources to handle all the “action” a third party can step in to assist. This provides opportunity for any player yet preserves flexibility to those same players—if, for example, they simply want to play cards, that’s all they have to do.

What is being proposed would **eliminate the flexibility and impose a mandate**—one that could easily discourage many players from attending our Cardroom. Compounding this is the prohibition of any third party from being able to step in to assist.

I am not aware of any problems with the current arrangements but can definitely see how the proposed language would hurt—if not completely shut down—our only Cardroom in town.

To that end, it is important to note that the **Napa Valley Casino** generates over \$200,000 per year in direct taxes; employs over 100 employees; and indirectly contributes to our local economy through business-to-business activities.

For these reasons, I oppose the language being proposed and strongly recommend we stay with the current regulations.

Sincerely,

A handwritten signature in blue ink, appearing to read "Mark Joseph".

**Mark Joseph, Council member**

**City of American Canyon**

**(707) 334-5216**

cc: Jason Holley, City Manager, City of American Canyon (**email only**)  
Christopher Huang, General Manager, Napa Valley Casino—B.V.K. Gaming Inc. (**email only**)

