

CASINO 99
175 east 20th st
Chico CA 95928

November 19th, 2014

Susanne George
Research Analyst
California Department of Justice
Bureau of Gambling Control
Sacramento, CA 95820

RE: Proposed Amendment to Gaming Activity Authorization Regulations

Dear Ms. George,

On behalf of the owners and management of Casino 99, I am writing to inform you of our **OPPOSITION** to any proposed regulations that hinder a gambling establishments ability to collect or waive fees as such regulations would be a **JOB KILLER** in our community.

These regulations would place an unnecessary burden on card room businesses in our area; we are In Chico CA. We have 4 Tribal casinos within 30 miles of us, none of them charge a player fee. By mandating that only cardrooms charge their customers a collection fee per wager we would not survive. For the past decade, cardrooms have had the freedom to charge their customers as they desired, and the government should not force businesses to charge their customers certain fees. Forced 1/3 player fee would hurt my earning potential drastically. Setting fees should be a casinos choice. A fair market system is fair only because of competition.

Casino 99 has mostly \$3 to \$10 per hand table games players. This is the hold on a typical \$5 bettor. I will use a minimum bet of \$5. A player wagers \$5 and pays a \$.50 collection. They are paying a -10% collection with a negative -3% for the game, the player would go broke every 8 hands and his \$5 would last 8 minutes. With no added collection their same \$5 would allow them to play 40 hands or 40 minutes. As a result players would be losing at a pace 5 times faster, our small recreational player would have no fun or chance to win and stop playing at Casino 99 and other cardrooms in Tribal areas. If Casino 99 was not in an area where the Tribal casinos were located I could charge a collection, but that would be a business choice. How does this protect the people of California?

Moreover, a government required collection fee would place an unnecessary restraint on many cardrooms, and position them at a competitive disadvantage to other gaming interests in the State. If these regulations were to go into effect, the cardroom in our city would go out of business, and many jobs would be lost.

At a time when many small businesses are struggling through these difficult economic times, it is imperative that businesses have the flexibility to charge their customers as they see fit. Special interests

should not be able to push regulations that dictate pricing models so that they do not have to compete with small businesses. This proposal is a form of regulatory price fixing. Responsible business owners in this state should be able to determine the fees that they want to charge their customers. Casino 99 in Chico employs 39 plus 10 Gold Gaming Corp employees a total of 49 employees, all making a living wage around \$20 an hour, If this regulation is put in effect it will cost people their jobs, and would severely disrupt our local economy. For these reasons and more, we respectfully OPPOSE these proposed regulations and label them as a **JOB KILLER**.

Thank you for your consideration of this matter

Sincerely,

Stan Seiff
GM / DA
Casino 99

Casino 99								
The difference between a No-collection and a collection Pure 21.5 Blackjack game. EDGE -2.5 to the player								
Amount wagered	No collection	Per hand	1 hour play	4 hour play	* Added collection	per hand	1 hour play	4 hour play
Bet \$5	0	(\$0.12)	(\$7.00)	(\$28.88)	*\$.50	(\$0.62)	(\$37.20)	(\$148.80)
Bet \$10	0	(\$0.25)	(\$15)	(\$60)	*\$.50	(\$0.75)	(\$45)	(\$180)
Bet \$20	0	(\$0.50)	(\$30)	(\$120)	*\$.50	(\$1)	(\$60)	(\$240)
Bet \$40	0	(\$1)	(\$60)	(\$240)	*\$.50	(\$1.50)	(\$90)	(\$360)
Bet \$60	0	(\$1.50)	(\$90)	(\$360)	*\$1	(\$2.50)	(\$150)	(\$600)
Nov-14								