

To: [BGC_Regulations](#)
Cc:
Subject: Comments on Proposed Regulations Concerning Blackjack-Style Games
Date: Monday, May 26, 2025 12:46:13 PM

CA Department of Justice, Bureau of Gambling Control
Attention: Regulations
2450 Del Paso Road, Suite 100
E-mail: BGC_Regulations@doj.ca.gov

The purpose behind the so-called permissible blackjack-style game—intended as a guideline for creating a similar version for California card rooms—can best be described as a “Player/Dealer Buster.” It is an impractical and illogical variant of blackjack that defies both the basic principles of game design and, more importantly, the fundamental mathematics and strategy that define the game.

The mathematical structure of the proposed game is comparable only to the original version of “21,” which was outlawed due to its impossibility for players to win. This new version closely mirrors the banned “Player Buster 21,” making it virtually impossible for the player-dealer to win. As such, it may conceptually violate California Penal Code Section 330.

The proposed rulemaking also omits the most crucial context: a clear definition of the game of 21 as it was historically played in unregulated saloons during the Gold Rush era—environments notorious for rigged, unwinnable games that served more as cons than actual contests of chance.

It is inconceivable that the Bureau of Gambling Control has thoroughly reviewed or even play-tested the proposed game. It is not a viable design for any casino setting. Its core mechanism appears to allow a player to win on a tie, regardless of the player-dealer's total—a concept entirely at odds with established blackjack principles such as player strategy, objective, and fair house advantage.

Today, every casino game offered in California card rooms undergoes rigorous review by Gaming Laboratories International (GLI), including analysis to ensure the game cannot be exploited due to flawed rules—an essential safeguard against attracting organized cheating operations.

The concerns with this proposed game—or guideline—extend beyond what is stated. There is a troubling lack of clarity around key player options: Will the Bureau allow splits, double downs, surrender, or side bets with odds-based payouts? These omissions raise questions about the integrity and intent behind the rulemaking.

Furthermore, the process and language surrounding the approval of such rules seem to suggest that the Bureau seeks the authority to eliminate any blackjack-style game, regardless of the specific rules, under the guise of political interests rather than in alignment with what is authorized under Penal Code Section 330.

Moe Mostashari
21st Century Gaming Inc.

To: [BGC Regulations](#)

Subject: Comments on Proposed Regulations Concerning Blackjack-Style Games; and Comments on Proposed Regulations Concerning Rotation of the Player-Dealer Position
Thursday, May 29, 2025

CA Department of Justice
Bureau of Gambling Control
Attention: Regulations
2450 Del Paso Road, Suite 100
Sacramento, CA 95834

Subject: Comments on Proposed Regulations Concerning Blackjack-Style Games; and Comments on Proposed Regulations Concerning Rotation of the Player-Dealer Position

To Whom It May Concern:

On behalf of ARYA Cleaners, I am writing to express serious concern regarding the California Department of Justice's proposed regulations related to blackjack-style games and the rotation of the player-dealer position.

These proposed changes would have far-reaching consequences, not only for card rooms like Seven Mile Casino but also for the broader Chula Vista community. Seven Mile Casino is a trusted and vital community partner here in Chula Vista, known for its steadfast support of local nonprofit organizations, youth programs, education initiatives, and public safety efforts. Their commitment to being a true community partner has made a meaningful difference in the lives of countless residents.

For decades, the games in question have been approved and overseen by the Attorney General's office. The newly proposed rules — which seek to reclassify or prohibit long-standing games — appear to exceed the Department's authority and contradict established legislative intent. Most alarmingly, the DOJ's own economic impact study estimates these changes could result in over \$500 million in lost revenue statewide.

At the local level, these regulations would potentially translate into:

- A loss of critical tax revenue that supports essential city services
- The elimination of jobs for hardworking Chula Vista residents
- A significant reduction in philanthropic contributions that sustain community programs

Given Seven Mile Casino's integral role as a trusted community partner, any changes to the games they operate must be carefully considered considering the very real impacts these changes will have on the Chula Vista community. We urge the Department to fully account for the social and economic consequences these regulations could impose, not only on the card room operators but on the nonprofits, families, and neighborhoods that rely on their support.

While our organization may not formally oppose the regulations, we respectfully request that the Department preserve the ability of responsible operators like Seven Mile Casino to continue their invaluable contributions to the health, stability, and wellbeing of Chula Vista.

Thank you for the opportunity to comment.

Sincerely,

Sassan Rahimzadeh
ARYA Cleaners
President



API INITIATIVE

May 29, 2025

To:

CA Department of Justice

Bureau of Gambling Control

Attention: Regulations

2450 Del Paso Road, Suite 100

Sacramento, CA 95834

Email: BGC_Regulations@doj.ca.gov

Subject: Comments on Proposed Regulations Concerning Blackjack-Style Games; and
Comments on Proposed Regulations Concerning Rotation of the Player-Dealer Position

To Whom It May Concern:

On behalf of the API Initiative, I am writing to express serious concern regarding the California Department of Justice's proposed regulations related to blackjack-style games and the rotation of the player-dealer position.

These proposed changes would have far-reaching consequences, not only for card rooms like Seven Mile Casino but also for the broader Chula Vista community. Seven Mile Casino is a trusted and vital community partner here in Chula Vista, known for its steadfast support of local nonprofit organizations, youth programs, education initiatives, and public safety efforts. Their commitment to being a true community partner has made a meaningful difference in the lives of countless residents.

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While our organization may not formally oppose the regulations, we respectfully request that the Department preserve the ability of responsible operators like Seven Mile Casino to continue their invaluable contributions to the health, stability, and wellbeing of Chula Vista.

Thank you for the opportunity to comment.

Sincerely,

JoAnn Fields
Government and Public Relations Director
API Initiative

CA Department of Justice
Bureau of Gambling Control
Attention: Regulations
2450 Del Paso Road, Suite 100
Sacramento, CA 95834

Email: BGC_Regulations@doj.ca.gov

Subject: Comments on Proposed Regulations Concerning Blackjack-Style Games; and
Comments on Proposed Regulations Concerning Rotation of the Player-Dealer Position

To Whom It May Concern:

On behalf of the Boys & Girls Clubs of South County, I am writing to share the positive impact Seven Mile Casino has had on our organization and our shared community.

Seven Mile Casino has been a consistent and valued partner in supporting our mission to serve youth and families in the South Bay. Their commitment to giving back has allowed us to expand programs, deepen community outreach, and strengthen the vital services we provide. Their generosity is not only financial—it's rooted in a deep understanding of community needs and a desire to uplift and connect those around them. Through their support, we've been able to create a connection with other local non-profits and provide resources for our families through collaborative impact. These contributions have had a lasting impact on the lives of those we serve and have helped us create a more inclusive, safe, and opportunity-rich environment for local youth.

More broadly, Seven Mile Casino plays an important role in the fabric of our region. They provide local jobs, contribute to the local economy, and support a wide range of nonprofits and civic efforts. Their presence goes far beyond business—it reflects a meaningful investment in the long-term well-being of our community.

We are grateful for their partnership and the values they bring to their work. Thank you for the opportunity to share our perspective.

Sincerely,

Stephanie James
President/CEO



BOYS and GIRLS CLUBS
OF SOUTH COUNTY

**Boys & Girls Clubs of
South County**

Officers

George Braudaway
Chief Volunteer Officer/Chair

Alan Lee
1st Vice Chair/Chair Elect

Gary Trieschman
**2nd Vice Chair of Programs &
Human Resources**

Tiffany Hecklinski
**3rd Vice Chair of Financial
Resource Development**

Shelley Webb Beh
Secretary

Christine Harlin
Treasurer

Board of Directors

Active Members
Casey Broach
Gonzalo Villamil

President/CEO
Stephanie James



Clovis Fire Fighters Local 1695

P.O. Box 691, Clovis, CA. 93613



Dear Director Yolanda Morrow and Ms. Andreia McMillen,

On behalf of the Clovis Firefighters Association (CFFA), I am writing to express our strong opposition to the proposed regulations concerning blackjack-style games and the rotation of the player-dealer position.

The Clovis Firefighters Association is composed of highly trained firefighters, paramedics, and emergency personnel dedicated to protecting the lives and property of our community. These proposed changes threaten our city's ability to maintain critical public safety services by significantly reducing a key source of local revenue.

The 500 Club Card Room plays an integral role in our community. It provides over 300 local jobs and generates important tax revenue that supports essential services—including fire and emergency response. These funds help us staff fire engines, purchase life-saving equipment, and reduce response times across the City of Clovis.

We are also concerned about the public safety implications of pushing players out of licensed, regulated cardrooms. History shows that when legal entertainment options disappear, unregulated and underground gambling activity tends to rise—increasing risk to residents and putting more pressure on emergency services and first responders.

For decades, cardrooms like the 500 Club have operated responsibly under close state and local oversight. They are trusted community partners who contribute to public safety, not threats to it. The proposed regulations are unnecessary, legally questionable, and disruptive to stable local economies.

We respectfully urge the Bureau to withdraw these proposed regulations and instead collaborate with local jurisdictions to better understand their long-term consequences for public safety and community well-being.

Sincerely,
Trenton F. McGill
CFFA Local 1695 President

To: [BGC Regulations](#)
Cc:
Subject: Comments on Proposed Regulations Concerning Blackjack-Style Games; and Comments on Proposed Regulations Concerning Rotation of the Player-Dealer Position
Date: Wednesday, May 28, 2025

To:
CA Department of Justice
Bureau of Gambling Control
Attention: Regulations
2450 Del Paso Road, Suite 100
Sacramento, CA 95834

Email: BGC_Regulations@doj.ca.gov

Subject: Comments on Proposed Regulations Concerning Blackjack-Style Games; and
Comments on Proposed Regulations Concerning Rotation of the Player-Dealer Position

To Whom It May Concern:

On behalf of Seven Mile Casino, I am writing to express serious concern regarding the California Department of Justice's proposed regulations related to blackjack-style games and the rotation of the player-dealer position.

These proposed changes would have far-reaching consequences, not only for card rooms like Seven Mile Casino but also for the broader Chula Vista community. Seven Mile Casino is a trusted and vital community partner here in Chula Vista, known for its steadfast support of local nonprofit organizations, youth programs, education initiatives, and public safety efforts. Their commitment to being a true community partner has made a meaningful difference in the lives of countless residents.

For decades, the games in question have been approved and overseen by the Attorney General's office. The newly proposed rules — which seek to reclassify or prohibit long-standing games — appear to exceed the Department's authority and contradict established legislative intent. Most alarmingly, the DOJ's own economic impact study estimates these changes could result in over \$500 million in lost revenue statewide.

At the local level, these regulations would potentially translate into:

- A loss of critical tax revenue that supports essential city services
- The elimination of jobs for hardworking Chula Vista residents
- A significant reduction in philanthropic contributions that sustain community programs

Given Seven Mile Casino's integral role as a trusted community partner, any changes to the games they operate must be carefully considered considering the very real impacts these changes will have on the Chula Vista community. We urge the Department to fully account for the social and economic consequences these regulations could impose, not only on the card room operators but on the nonprofits, families, and neighborhoods that rely on their

support.

While our organization may not formally oppose the regulations, we respectfully request that the Department preserve the ability of responsible operators like Seven Mile Casino to continue their invaluable contributions to the health, stability, and wellbeing of Chula Vista.

Thank you for the opportunity to comment.

Sincerely,
Sharmane Estolano, CLPF
Professional Licensed Fiduciary
South County Fiduciary Services
Broker Associate [REDACTED]
Coldwell Banker West

**LATINO
EQUALITY
ALLIANCE**



**ALIANZA
LATINA POR
LA IGUALDAD**



Social Club



**California
Human Development**

**Senior
Citizens Club**

**City of Hawaiian Gardens
Golden Age Club**

May 28, 2025

The Honorable Rob Bonta
Attorney General, CA Department of Justice, Bureau of Gambling Control
Attention: Regulations
2450 Del Paso Road, Suite 100
Sacramento, CA 95834

RE: Oppose the proposed regulations by Attorney General Bonta to regulate cardrooms

Dear Attorney General Bonta,

On behalf of the undersigned organizations, we strongly oppose the proposed regulations, by California Attorney General Rob Bonta, to regulate cardrooms due to the significant risks it poses to the economic and social fabric of our state. The proposed regulations prohibit blackjack and set restrictions on player rotation.

Cardrooms serve as vital regional economic engines, directly employing local residents and providing critical opportunities for low-income families, including Latinos, Asian Pacific Islanders, and African Americans. Cardroom jobs have empowered many to purchase homes, send their children to college, and secure a stable livelihood without the requirement of a college degree. For individuals who may face barriers to traditional employment, cardroom jobs offer a crucial pathway to financial stability.

The current federal administration is attacking our communities of color on a daily basis; these regulations are also an attack on our communities of color. As an attorney general you take pride in standing up for the most vulnerable by constantly suing the current federal administration, issuing

guidelines for Diversity, Equity, Inclusion and Accessibility for businesses, and immigration guidelines for schools and health facilities. We serve those vulnerable communities you seek to protect; yet, your regulations are also a direct attack on our diverse communities.

In communities often burdened with severe challenges—such as food insecurity, homelessness, unemployment, violence, mental health issues, environmental pollution and health disparities—cardroom revenue is a lifeline. Local governments depend on this revenue to fund essential services like public safety, emergency response, fire protection, healthcare, homelessness programs, transportation, and other critical initiatives. In many cases, the undocumented and rural poor benefit directly from these tax revenues, ensuring that even the most vulnerable among us receive the support they need.

Community groups, labor unions, and local governments have all voiced strong opposition to the proposed regulations by Attorney General Bonta to regulate cardrooms. The COVID-19 pandemic demonstrated the fragility of our support systems when cardrooms were forced to close, halting essential services to those most in need.

SB 549 which became law in 2024 allows tribes to sue cardrooms. The lawsuits will threaten the cardroom's existence. The proposed regulations by Attorney General Bonta to regulate cardrooms are another burden that will lead to cardrooms closing their doors. The resulting diversion of cardroom revenue towards unnecessary legal battles and to comply with the proposed regulation would deprive low-income and disadvantaged communities of the essential services they depend on, particularly at a time when California's economy is facing significant economic challenges.

These proposed regulations threaten our ability to be self-sufficient, exacerbating the very issues—food insecurity, homelessness, unemployment, substance abuse, violence, mental health crises, and health disparities—that we are working tirelessly to address.

For these reasons, we respectfully urge you to reconsider moving forward with these regulations. We stand ready to work collaboratively with your office, community organizations, labor unions, and local governments to develop policies that protect jobs, sustain essential public services, and uphold the economic well-being of California's diverse communities.

Sincerely,

Vita Martinez
AM PM IDEAL PET CARE

Yvonne Sandoval
Senior Citizens Club

Ricardo Zelaya
Boys and Girls Club Bell Gardens

Guille Reyes
Social Club

Lidia Reyes
City of Hawaiian Gardens, Golden Age Club

Daniel Ramirez
Hawaiian Gardens Little League

Jesus Suatan
Programs Coordinator
Latino Equality Alliance

Johncito Peraza
Commerce Evening Lions Club

Pedro Molina
CEO
First Day Foundation, Inc.

Marco Lizárraga
Executive Director
La Cooperativa Campesina de California

Michelle Engele-Silva
Interim Chief Executive Officer
Proteus Inc.

Thomas Stuebner
Chief Executive Officer
California Human Development

Jorge De Nava Jr.
Executive Director
Central Valley Opportunity Center

Ruben Solorio
President & CEO
The Center for Employment Training

VIA EMAIL ONLY

May 28, 2025

CA Department of Justice
Bureau of Gambling Control
Attention: Regulations
2450 Del Paso Road, Suite 100
Sacramento, CA 95834
Email: BGC_Regulations@doj.ca.gov

Subject: Comments on Proposed Regulations Concerning Blackjack-Style Games; and
Comments on Proposed Regulations Concerning Rotation of the Player-Dealer Position

To Whom It May Concern:

I am a local business owner and participate on a number of community organizations. I am writing to express serious concern regarding the California Department of Justice's proposed regulations related to blackjack-style games and the rotation of the player-dealer position.

These proposed changes would have far-reaching consequences, not only for card rooms like Seven Mile Casino but also for the broader Chula Vista community. Seven Mile Casino is a trusted and vital community partner here in Chula Vista, known for its steadfast support of local nonprofit organizations, youth programs, education initiatives, and public safety efforts. Their commitment to being a true community partner has made a meaningful difference in the lives of countless residents.

For decades, the games in question have been approved and overseen by the Attorney General's office. The newly proposed rules — which seek to reclassify or prohibit long-standing games — appear to exceed the Department's authority and contradict established legislative intent. Most alarmingly, the DOJ's own economic impact study estimates these changes could result in over \$500 million in lost revenue statewide.

At the local level, these regulations would potentially translate into:

- A loss of critical tax revenue that supports essential city services
- The elimination of jobs for hardworking Chula Vista residents
- A significant reduction in philanthropic contributions that sustain community programs

Given Seven Mile Casino's integral role as a trusted community partner, any changes to the games they operate must be carefully considered considering the very real impacts these changes will have on the Chula Vista community. We urge the Department to fully account for the social and economic consequences these regulations could impose, not only on the card room operators but on the nonprofits, families, and neighborhoods that rely on their support.

While I may not formally oppose the regulations, we respectfully request that the Department preserve the ability of responsible operators like Seven Mile Casino to continue their invaluable contributions to the health, stability, and wellbeing of Chula Vista.

Lastly, I am not a customer of Seven Mile Casino, but I am a supporter as I have come to see how Seven Mile Casino gives back in many ways including the use of their restaurant for events that benefit our community as a whole.

Thank you for the opportunity to comment.

To: [BGC Regulations](#)
Subject: Proposed Regulations: Rotation of Player-Dealer Position & Blackjack-Styles Games
Date: Thursday, May 29, 2025

The proposed closure of a card room by an Indian Reservation in California has sparked significant concern due to its potential ripple effects. The card room, a source of employment for many local residents, supports numerous jobs and contributes to the community's economic stability. Shutting it down would likely lead to increased unemployment, placing financial strain on workers and their families. Additionally, the closure could impact California's state budget, as the card room generates tax revenue that supports public services. The decision has ignited debate over balancing tribal sovereignty with the broader economic consequences for the state and its residents.

To: [BGC Regulations](#)

Subject: Proposed Regulations: Rotation of Player-Dealer Position & Blackjack-Style Games

Date: Thursday, May 29, 2025

The Indian Reservation's push to shut down the local card room, exacerbated by the player-dealer requirement per table, risks severe economic consequences that warrant reconsideration. This closure would cripple the card room's viability, leading to significant job losses and increased unemployment for community members who rely on these jobs. The ripple effect would also reduce tax revenue critical to California's budget, straining public services. While tribal sovereignty is respected, the Reservation should carefully weigh the broader impact on workers, families, and the state's economy. Reconsidering this decision could preserve livelihoods and maintain a vital economic contributor to the region.

May 23, 2025

To:

CA Department of Justice
Bureau of Gambling Control
Attention: Regulations
2450 Del Paso Road, Suite 100
Sacramento, CA 95834
Email: BGC_Regulations@doj.ca.gov

Subject: Comments on Proposed Regulations Concerning Blackjack-Style Games; and
Comments on Proposed Regulations Concerning Rotation of the Player-Dealer Position

To Whom It May Concern:

I am writing to express serious concern regarding the California Department of Justice's proposed regulations related to blackjack-style games and the rotation of the player-dealer position.

These proposed changes would have far-reaching consequences, not only for card rooms like Seven Mile Casino but also for the broader Chula Vista community. I am a proud lifelong resident, business and community leader of Chula Vista that is deeply involved in several nonprofit organizations that service the South Bay region of San Diego County. I am in full support for Seven Mile Casino and would like to share the positive and lasting impact they have had on our community. Seven Mile Casino is a trusted and vital community partner here in Chula Vista, known for its steadfast support of local nonprofit organizations, youth programs, education initiatives, and public safety efforts. Their commitment to being a true community partner has made a meaningful difference in the lives of countless residents.

For decades, the games in question have been approved and overseen by the Attorney General's office. The newly proposed rules — which seek to reclassify or prohibit long-standing games — appear to exceed the Department's authority and contradict established legislative intent. Most alarmingly, the DOJ's own economic impact study estimates these changes could result in over \$500 million in lost revenue statewide.

At the local level, these regulations would potentially translate into:

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Given Seven Mile Casino's integral role as a trusted community partner, any changes to the games they operate must be carefully considered considering the very real impacts these changes will have on the Chula Vista community. We urge the Department to fully account for the social and economic consequences these regulations could impose, not only on the card room operators but on the nonprofits, families, and neighborhoods that rely on their support.

While I may not formally oppose the regulations, I respectfully request that the Department preserve the ability of responsible operators like Seven Mile Casino to continue their invaluable contributions to the health, stability, and wellbeing of Chula Vista.

Thank you for the opportunity to comment.

Sincerely

To: [BGC_Regulations](#)
Cc:
Subject: Comments on Proposed Regulations Concerning Blackjack-Style Games; and Comments on Proposed Regulations Concerning Rotation of the Player-Dealer Position
Date: Thursday, May 29, 2025

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I respectfully request that the Department preserve the ability of responsible operators like Seven Mile Casino to continue their invaluable contributions to the health, stability, and wellbeing of Chula Vista.
Sincerely

To: [BGC Regulations](#)
Subject: "Proposed Regulations: Rotation of Player-Dealer Position & Blackjack-Style Games"
Date: Wednesday, May 28, 2025



Dear attorney general,

I'm writing as a concerned community member and patron to express my strong support for keeping all California games open. This card room is more than just a place to play—it's a vital social space that brings people together, supports local jobs, and contributes to the city's economy.

Over the years, the card rooms have provided a safe, well-regulated environment for responsible gaming. Many residents, including seniors and veterans, rely on it as a social outlet and gathering place. Shutting it down would remove an important community hub and negatively affect employees and small businesses that benefit from its operation.

Rather than closing the card room, I urge you to consider ways to address any concerns while preserving its role in our community. Transparency, regulation, and open dialogue can go a long way.

Thank you for your time and consideration.

Sincerely,

May 28, 2025

To:

CA Department of Justice
Bureau of Gambling Control
Attention: Regulations
2450 Del Paso Road, Suite 100
Sacramento, CA 95834
Email: BGC_Regulations@doj.ca.gov

Subject: Comments on Proposed Regulations Concerning Blackjack-Style Games; and
Comments on Proposed Regulations Concerning Rotation of the Player-Dealer Position

To Whom It May Concern:

My name is [REDACTED] and I am writing to express serious concern regarding the California Department of Justice's proposed regulations related to blackjack-style games and the rotation of the player-dealer position.

These proposed changes would have far-reaching consequences, not only for card rooms like Seven Mile Casino but also for the broader Chula Vista community. Seven Mile Casino is a trusted and vital community partner here in Chula Vista, known for its steadfast support of local nonprofit organizations, youth programs, education initiatives, and public safety efforts. Their commitment to being a true community partner has made a meaningful difference in the lives of countless residents.

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Thank you for the opportunity to comment.

Sincerely

To: [BGC Regulations](#)
Subject: I need a job
Date: Thursday, May 29, 2025

If the law approves ,I think more than 40 thousand people will lose jobs!

To: [BGC Regulations](#)
Subject: "Proposed Regulations: Rotation of Player-Dealer Position & Blackjack-Style Games".
Date: Thursday, May 29, 2025

To who it may concern,

Are those Indian Reservation casinos not making enough money? Everyone just wants peace and have a decent job and a decent life. If you want to shut us down, why not closed all the casinos down and MAKE GAMBLING ILLEGAL ? That way, you will know how we feel... thank you for your time!

To: [BGC Regulations](#)
Subject: mile High Casino
Date: Tuesday, May 27, 2025

To whom it may concern,

I am writing to express my concern about removing the direct player card at the Casino. In the interest of full disclosure I do not play cards. but I consider this very important to those in the community that prefer cards over slot. I am a retired school principal and an author of historical books about Latinos in the San Diego region. I have served on various community boards. One of my biggest concerns is the support for our local non profits. Anyone who has served a non profit knows how valuable the support for non profits is. There is never enough funds to support student program, mentor program or art and music programs. These funds have enabled many non-profits to supplement these vital programs. As a retired principal I know the value these programs bring to the community.

Tax bases is another concern I have. There is a time Chula Vista was a small town. Today it is a city that is growing every day. There is now a new hotel that just this past week hosted its soft opening. This will bring more business to Chula Vista as well as Mile Casino. It will give a different recreation that is not found in most cities. I am also thinking of the tax base it provides to the city of Chula Vista.

In this day and age one of the most important things that it provides is a well paying job. Our country is facing many obstacles that have prevented people from achieving a living wage. As you know the cost of living in California is outrageous. Those that work at the casino do earn a living wage. The loss of this employment would be devastating to this community.

If you would like me to meet with you or have a phone conversation about this issue please feel free to contact me .

Thank you for taking the time to read this email

From:
To: [BGC Regulations](#)
Subject: Comments on Proposed Regulations Concerning Blackjack-Style Games
Date: Wednesday, May 28, 2025



EL CONCILIO Family Services

May 28, 2025

Board of Directors

M.A. Hasan
President
Hasan Consultants

Dr. Jeanette Sanchez Pala
Vice President
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Diana Lopez
Ventura County Credit Union

Marina Martinez
The Players Casino

Lupe Servin
Century 21

Carmen DeArcos-Gonzalez
Community Member

Yvonne R. Gutierrez
Executive Director

Department of Justice, Bureau of Gambling Control
Attention: Regulations
2450 Del Paso Road, Suite 100
Sacramento, CA 95834
E-mail: BGC_Regulations@doj.ca.gov

**Re: Comments on Proposed Regulations Concerning Blackjack-Style Games;
Comments on Proposed Regulations Concerning Rotation of the Player-Dealer Position**

Dear Director Yolanda Morrow and Ms. Andreia McMillen:

We, at El Concilio Family Services, provide critical services to underserved residents in Ventura County communities. We are writing to express our serious concerns regarding the impact on the Players Casino in Ventura California of the April 11, 2025, proposed draft regulations regarding blackjack-style games and the rotation of the player-dealer position.

We align with the objections raised by Munger, Tolles & Olson LLP on behalf of the California Gaming Association, Communities for California Cardrooms, and the California Cardroom Alliance, emphasizing that the draft regulations lack legal support and exceed the Bureau's statutory authority under the Gambling Control Act. These changes, unsupported by statute or case law, would have a detrimental impact on the cardroom industry, jeopardizing jobs and the local economies that benefit from their operations.

Our cardroom not only provides significant tax revenues but also supports local public services critical to our community, including police, fire protection, parks and other critical community-based services. They provide significant contributions to community-based organizations in our area to help with the import work we do for vulnerable individuals and families. The proposed changes will result in reduced revenue to the Casino and contributions that will harm our quality of life at a time when we are facing significant budgetary reductions from both the Federal and State government resources.

We ask the Bureau to reconsider the proposed draft regulations, focus on enforcing existing laws against illegal gambling, and engage with stakeholders to find a resolution that upholds the legal gaming industry's role in supporting California's economy.

We appreciate your consideration.

Yvonne R. Gutierrez,

Executive Director

El Concilio is a non-profit organization whose mission is to provide direct assistance and educational programs to the underserved Latino Community. The majority of our clients are agricultural workers and the well being of their families is vital to a stable and productive agricultural industry.



Follow us: Facebook:El-Concilio-Family-Services
 Twitter@ElConcilio
 LinkedIn: el-concilio-family-services

May, 20th, 2025.



CA Department of Justice
Bureau of Gambling Control
Attention: Regulations
2450 Del Paso Road, Suite 100
Sacramento, CA 95834

Subject: Comments on Proposed Regulations Concerning Blackjack-Style Games; and Comments on Proposed Regulations Concerning Rotation of the Player-Dealer Position

To Whom It May Concern:

On behalf of Energy Communications Corp., I am writing to express serious concern regarding the California Department of Justice's proposed regulations related to blackjack-style games and the rotation of the player-dealer position.

These proposed changes would have far-reaching consequences, not only for card rooms like Seven Mile Casino but also for the broader Chula Vista community. Seven Mile Casino is a trusted and vital community partner here in Chula Vista, known for its steadfast support of local nonprofit organizations, youth programs, education initiatives, and public safety efforts. Their commitment to being a true community partner has made a meaningful difference in the lives of countless residents.

For decades, the games in question have been approved and overseen by the Attorney General's office. The newly proposed rules — which seek to reclassify or prohibit long-standing games — appear to exceed the Department's authority and contradict established legislative intent. Most alarmingly, the DOJ's own economic impact study estimates these changes could result in over \$500 million in lost revenue statewide.

At the local level, these regulations would potentially translate into:

- A loss of critical tax revenue that supports essential city services
- The elimination of jobs for hardworking Chula Vista residents
- A significant reduction in philanthropic contributions that sustain community programs

Given Seven Mile Casino's integral role as a trusted community partner, any changes to the games they operate must be carefully considered considering the very real impacts these changes will have on the Chula Vista community. We urge the Department to fully account for the social and economic consequences these regulations could impose, not only on the card room operators but on the nonprofits, families, and neighborhoods that rely on their support.

While our organization may not formally oppose the regulations, we respectfully request that the Department preserve the ability of responsible operators like Seven Mile Casino to continue their invaluable contributions to the health, stability, and wellbeing of Chula Vista.

Thank you for the opportunity to comment.

Sincerely,

Patricia Álvarez de los Cobos
President and CEO
Energy Communications Corp.





May 22, 2025

To whom it may concern,

I write to express our deep concern regarding the California Department of Justice's proposed regulations affecting blackjack-style games and the rotation of the player-dealer position.

Seven Mile Casino has been more than just a local business in Chula Vista; it is a vital community partner whose steadfast support strengthens nonprofits, youth programs, educational initiatives, and public safety efforts throughout the region. Their commitment has positively impacted countless lives, including many families and individuals served by our foundation.

For decades, the games under review have operated within the regulatory framework established by the Attorney General's office. The proposed regulatory changes, which seek to reclassify or prohibit these long-standing games, appear to overstep the Department's authority and conflict with legislative intent. The Department's own economic impact analysis warns that these changes could result in over \$500 million in lost statewide revenue.

At the local level, this could mean:

- A significant loss of tax revenue crucial for funding essential city services
- The elimination of jobs for many dedicated Chula Vista residents
- More importantly for our organization, a sharp decline in philanthropic contributions that sustain vital community programs and services, including those supported by the Gurmilan Foundation.

Given the integral role Seven Mile Casino plays as a community partner, we urge the Department of Justice to carefully consider the broader social and economic impacts of these proposed regulations. The potential harm extends far beyond the casino itself, affecting the nonprofits, families, and neighborhoods that depend on its support.

While the Gurmilan Foundation does not formally oppose the regulations, we respectfully request that the Department preserve the ability of responsible operators like Seven Mile Casino to continue their crucial contributions to the well-being and stability of the Chula Vista community.

Thank you for your attention and the opportunity to provide input.

Warm regards,

Dir. Humberto Gurmilan

The Gurmilan Foundation

[Organization Letterhead – if available]

[Date]

To:

CA Department of Justice

Bureau of Gambling Control

Attention: Regulations

2450 Del Paso Road, Suite 100

Sacramento, CA 95834

Email: BGC_Regulations@doj.ca.gov

Subject: Comments on Proposed Regulations Concerning Blackjack-Style Games; and
Comments on Proposed Regulations Concerning Rotation of the Player-Dealer Position

To Whom It May Concern:

On behalf of Myself, I am writing to express serious concern regarding the California Department of Justice's proposed regulations related to blackjack-style games and the rotation of the player-dealer position.

These proposed changes would have far-reaching consequences, not only for card rooms like Seven Mile Casino but also for the broader Chula Vista community. Seven Mile Casino is a trusted and vital community partner here in Chula Vista, known for its steadfast support of local nonprofit organizations, youth programs, education initiatives, and public safety efforts. Their commitment to being a true community partner has made a meaningful difference in the lives of countless residents.

For decades, the games in question have been approved and overseen by the Attorney General's office. The newly proposed rules — which seek to reclassify or prohibit long-standing games — appear to exceed the Department's authority and contradict established legislative intent. Most alarmingly, the DOJ's own economic impact study estimates these changes could result in over \$500 million in lost revenue statewide. With the recent opening of the Gaylord Convention Center, 7 Mile Casino is an amenity for not only the local players but the visitors to the Bayfront.

At the local level, these regulations would potentially translate into:

- A loss of critical tax revenue that supports essential city services
- The elimination of jobs for hardworking Chula Vista residents
- A significant reduction in philanthropic contributions that sustain community programs

Given Seven Mile Casino's integral role as a trusted community partner, any changes to the games they operate must be carefully considered considering the very real impacts these changes will have on the Chula Vista community. We urge the Department to fully account for the social and economic consequences these regulations could impose, not only on the card room operators but on the nonprofits, families, and neighborhoods that rely on their support.

We respectfully request that the Department preserve the ability of responsible operators like Seven Mile Casino to continue their invaluable contributions to the health, stability, and wellbeing of Chula Vista.

Thank you for the opportunity to comment.

[President]
M. Kevin O'Neill Const. Co. Inc.

May 21, 2025

CA Department of Justice
Bureau of Gambling Control
Attention: Regulations
2450 Del Paso Road, Suite 100
Sacramento, CA 95834

Sent Via Email: BGC_Regulations@doj.ca.gov

Subject: Comments on Proposed Regulations Concerning Blackjack-Style Games; and
Comments on Proposed Regulations Concerning Rotation of the Player-Dealer Position

To Whom It May Concern:

On behalf of Living Coast Discovery Center, I am writing to express our gratitude for the community support provided by our neighbor Seven Mile Casino in Chula Vista, CA. Seven Mile Casino is a trusted and vital community partner here in Chula Vista, known for its steadfast support of local nonprofit organizations, youth programs, education initiatives, and public safety efforts. Their commitment to being a true community partner has made a meaningful difference in the lives of countless residents.

Given Seven Mile Casino's integral role as a trusted community partner, any changes to the games they operate must be carefully considered considering the very real impacts these changes will have on the Chula Vista community. We urge the Department to fully account for the social and economic consequences these regulations could impose, not only on the card room operators but on the nonprofits, families, and neighborhoods that rely on their support.

While our organization may not formally oppose the regulations, we respectfully request that the Department preserve the ability of responsible operators like Seven Mile Casino to continue their invaluable contributions to the health, stability, and wellbeing of Chula Vista.

Thank you for the opportunity to comment.

Sincerely,

Lori Torio
Director of Community Engagement and Development
Living Coast Discovery Center

May 23, 2025

California Department of Justice, Bureau of Gambling Control
Attention: Regulations
2450 Del Paso Road, Suite 100
Sacramento, CA 95834

Re: Comments on Proposed Regulations Concerning Blackjack-Style Games and Rotation of the Player-Dealer Position

Dear Director Yolanda Morrow and Ms. Andreia McMillen:

On behalf of the Los Angeles County Business Federation (BizFed), a grassroots and diverse business organization made up of over 240 business organizations mobilizing 420,000 employers with five million employees in Los Angeles County, **we are writing to express our strong opposition to the proposed regulations concerning blackjack-style games and the rotation of the player-dealer position.**

If adopted, these regulations would devastate the cardroom industry and threaten over 5,000 good-paying jobs in Los Angeles County alone—representing nearly half of the cardroom workforce in the region. These jobs are a critical lifeline for working families, particularly in underserved communities where economic opportunities are limited.

The economic impact to local governments would be equally severe. Cardrooms are a significant source of general fund revenue for several cities—funding vital services such as police, fire protection, emergency response, and park maintenance. Eliminating this revenue would force cities to make deep cuts that hurt residents and compromise public safety.

Now is not the time to destabilize a reliable economic engine. These proposed regulations are economically reckless and based on flawed assumptions, including the idea that displaced patrons will simply shift to tribal casinos. In reality, we risk driving gaming into illegal, unregulated operations—exacerbating crime and creating costly enforcement challenges for local jurisdictions.

Further, these regulations overstep the Bureau's authority and undermine a well-established, legally compliant industry that has operated safely and successfully for decades.

For these reasons, we strongly urge the Bureau to withdraw the proposed regulations as they will have a direct impact on Californians.

Sincerely,

Angela Gibson-Shaw
BizFed 2025 Chair
GLAAACC

David Fleming
BizFed Founding Chair

Tracy Hernandez
BizFed Founding CEO
IMPOWER, Inc.

David Englin
BizFed President

BizFed Association Members

Action Apartment Association
Advanced Medical Technology Association
Alhambra Chamber
American Beverage Association
Antelope Valley Chamber formerly Lancaster Chamber of Commerce
Apartment Association of Greater Los Angeles
Apartment Association of Orange County
Apartment Association, CA Southern Cities, Inc .
Apartment Association of California
Arcadia Association of Realtors
AREAA North Los Angeles SFV SCV
Armenian American Business Association
Armenian Trade & Labor Association
Arts District Los Angeles
ASCM Inland Empire Chapter
Associated Builders & Contractors SoCal (ABC SoCal)
Associated General Contractors
Association of Independent Commercial Producers
AV Edge California
Azusa Chamber
Bell Chamber
Beverly Hills Chamber
BioCom
Black Business Association
Black Professional Network
Boyle Heights Chamber of Commerce
Bridge Compton Org
Building Industry Association - LA/Ventura Counties
Building Industry Association of Southern California
Building Industry Association- Baldyview
Building Owners & Managers Association of Greater Los Angeles
Burbank Association of Realtors
Burbank Chamber of Commerce
Business and Industry Council for Emergency Planning and Preparedness
Business Resource Group
CalAsian Chamber
CalChamber
California African American Chamber of Commerce
California Apartment Association- Los Angeles
California Asphalt Pavement Association
California Bankers Association
California Black Chamber of Commerce
California Business Properties
California Business Roundtable
California Cleaners Association
California Contract Cities Association
California Council for Environmental & Economic Balance (CCEEB)
California Fuels & Convenience Alliance- Formerly California Independent Oil Marketers Association (CIOMA)
California Gaming Association
California Grocers Association
California Hispanic Chamber
California Hotel & Lodging Association
California Independent Petroleum Association
California Infrastructure Delivery Coalition
California Life Sciences Association
California Manufacturers & Technology Association
California Metals Coalition
California Natural Gas Producers Association
California Restaurant Association
California Retailers Association
California Self Storage Association
California Small Business Alliance
California Travel Association (CalTravel)
California Trucking Association
Californians For Smarter Sustainability
Carson Chamber of Commerce
Carson Dominguez Employers Alliance
Central City Association
Century City Chamber of Commerce
Chatsworth Porter Ranch Chamber of Commerce
Citrus Valley Association of Realtors
Civil Justice Association of California CJAC
Claremont Chamber of Commerce
Commerce Business Council formerly Commercial Industrial Council/Chamber of Commerce
Compton Chamber of Commerce
Compton Community Development Corporation
Compton Entertainment Chamber of Commerce
Construction Industry Air Quality Coalition
Construction Industry Coalition on Water Quality
Council of Infill Builders
Crenshaw Chamber of Commerce
Culver City Chamber of Commerce
Downey Chamber of Commerce

Downtown Alliance
Downtown Long Beach Alliance
DTLA Chamber of Commerce
El Monte/South El Monte Chamber
El Salvador Corridor Association
El Segundo Chamber of Commerce
Employers Group
Energy Independence Now EIN
Engineering Contractor's Association
EXP The Opportunity Engine
FastLink DTLA
Filipino American Chamber of Commerce
Friends of Hollywood Central Park
FuturePorts
Gardena Valley Chamber
Gateway to LA
Glendale Association of Realtors
Glendale Chamber
Glendora Chamber
Greater Antelope Valley AOR
Greater Bakersfield Chamber of Commerce
Greater Coachella Valley Chamber of Commerce
Greater Downey Association of REALTORS
Greater Lakewood Chamber of Commerce
Greater Leimert Park Crenshaw Corridor BID
Greater Los Angeles African American Chamber
Greater Los Angeles Association of Realtors
Greater Los Angeles New Car Dealers Association
Greater San Fernando Valley Chamber
Harbor Association of Industry and Commerce
Harbor Trucking Association
Historic Core BID of Downtown Los Angeles
Hollywood Chamber
Hospital Association of Southern California
Hotel Association of Los Angeles
ICBWA- International Cannabis Women Business Association
Independent Cities Association
Independent Hospitality Coalition
Industrial Environmental Association
Industry Business Council
Inglewood Board of Realtors
Inland Empire Economic Partnership
Irwindale Chamber of Commerce
Kombucha Brewers International
La Cañada Flintridge Chamber
LA County Medical Association
LA Fashion District BID
LA South Chamber of Commerce
Larchmont Boulevard Association
Latin Business Association
Latino Food Industry Association
Latino Golfers Association
Latino Restaurant Association
LAX Coastal Area Chamber
Licensed Adult Residential Care Association- LARCA
Long Beach Area Chamber
Long Beach Economic Partnership
Long Beach Major Arts Consortium
Los Angeles Area Chamber
Los Angeles Economic Development Center
Los Angeles Gateway Chamber of Commerce
Los Angeles Latino Chamber
Los Angeles LGBTQ Chamber of Commerce
Los Angeles Parking Association
Los Angeles Regional Food Bank
MADIA Tech Launch
Malibu Chamber of Commerce
Manhattan Beach Chamber of Commerce
Manhattan Beach Downtown Business & Professional Association
Marina Del Rey Lessees Association
Marketplace Industry Association
Monrovia Chamber
Motion Picture Association of America, Inc.
MoveLA
MultiCultural Business Alliance
NAIOP Southern California Chapter
NAREIT
National Association of Minority Contractors
National Association of Theatre Owners
CA/Nevada
National Association of Women Business Owners
National Association of Women Business Owners - LA
National Association of Women Business Owners- California
National Federation of Independent Business Owners California
National Hookah
National Latina Business Women's Association
Norwegian American Chamber of Commerce
Ofiso Community Foundation

Orange County Business Council
Orange County Hispanic Chamber of Commerce
Pacific Merchant Shipping Association
Panorama City Chamber of Commerce
Paramount Chamber of Commerce
Pasadena Chamber
Pasadena Foothills Association of Realtors
PGA
Pharmaceutical Care Management Association
PhRMA
Pico Rivera Chamber of Commerce
Pomona Chamber
Rancho Southeast REALTORS
ReadyNation California
Recording Industry Association of America
Regional CAL Black Chamber, SVF
Regional Hispanic Chambers
San Gabriel Valley Economic Partnership
San Pedro Peninsula Chamber of Commerce
Santa Clarita Valley Chamber
Santa Clarita Valley Economic Development Corp.
Santa Monica Chamber of Commerce
Secure Water Alliance
Sherman Oaks Chamber
Signal Hill Chamber
South Bay Association of Chambers
South Bay Association of Realtors
South Gate Chamber of Commerce
Southern California Contractors Association
Southern California Golf Association
Southern California Grantmakers
Southern California KFC Franchise
Southern California Leadership Council
Southern California Minority Suppliers Development Council Inc.
Southern California Water Coalition
Southland Regional Association of Realtors
Specialty Equipment Market Association
Structural Engineers Association of Southern California
Sunland/Tujunga Chamber
Sunset Strip Business Improvement District
Swiss American Chamber of Commerce
Thai American Chamber of Commerce
The Bridge Network
The LA Coalition for the Economy & Jobs
The Los Angeles Taxpayers Association
The Two Hundred for Homeownership
Torrance Area Chamber
Tri-Counties Association of Realtors
United Chambers – San Fernando Valley & Region
United Contractors
United States-Mexico Chamber
Unmanned Autonomous Vehicle Systems Association
Urban Business Council
US Green Building Council
US Resiliency Council
Valley Economic Alliance, The
Valley Industry & Commerce Association
Venice Chamber of Commerce
Vermont Slauson Economic Development Corporation
Veterans in Business
Vietnamese American Chamber
Village of Sherman Oaks BID
Warner Center Association
West Covina Chamber
West Hollywood Chamber
West Hollywood Design District
West Los Angeles Chamber
West San Gabriel Valley Association of Realtors
West Valley/Warner Center Chamber
Westchester BID
Western Electrical Contractors Association
Western Manufactured Housing Association
Western Propane Gas Association
Western States Petroleum Association
Westside Council of Chambers
Westwood Community Council
Whittier Chamber of Commerce
Wilmington Chamber
World Trade Center
Yes in My Backyard
7-Eleven Franchise Owners Association of Southern California



CA Department of Justice
Bureau of Gambling Control
Attention: Regulations
2450 Del Paso Road, Suite 100
Sacramento, CA 95834
Email: BGC_Regulations@doj.ca.gov

Subject: Comments on Proposed Regulations Concerning Blackjack-Style Games; and Comments on Proposed Regulations Concerning Rotation of the Player-Dealer Position

To Whom It May Concern:

On behalf of MARAYA PERFORMING ARTS, I am writing to express serious concern regarding the California Department of Justice's proposed regulations related to blackjack-style games and the rotation of the player-dealer position.

These proposed changes would have far-reaching consequences, not only for card rooms like Seven Mile Casino but also for the broader Chula Vista community. Seven Mile Casino is a trusted and vital community partner here in Chula Vista, known for its steadfast support of local nonprofit organizations, youth programs, education initiatives, and public safety efforts. Their commitment to being a true community partner has made a meaningful difference in the lives of countless residents.

For decades, the games in question have been approved and overseen by the Attorney General's office. The newly proposed rules — which seek to reclassify or prohibit long-standing games — appear to exceed the Department's authority and contradict established legislative intent. Most alarmingly, the DOJ's own economic impact study estimates these changes could result in over \$500 million in lost revenue statewide.

At the local level, these regulations would potentially translate into:

- A loss of critical tax revenue that supports essential city services
- The elimination of jobs for hardworking Chula Vista residents
- A significant reduction in philanthropic contributions that sustain community programs

Given Seven Mile Casino's integral role as a trusted community partner, any changes to the games they operate must be carefully considered considering the very real impacts these changes will have on the Chula Vista community. We urge the Department to fully account for the social and economic consequences these regulations could impose, not only on the card room operators but on the nonprofits, families, and neighborhoods that rely on their support.

While our organization may not formally oppose the regulations, we respectfully request that the Department preserve the ability of responsible operators like Seven Mile Casino to continue their invaluable contributions to the health, stability, and wellbeing of Chula Vista.

Thank you for the opportunity to comment.

Sincerely,

Anjanette Maraya-Ramey, MA,
CNP CEO & Artistic Director
Maraya Performing Arts



May 24, 2025

**CA Department of Justice
Bureau of Gambling Control**

Attention: Regulations

2450 Del Paso Road, Suite 100

Sacramento, CA 95834

Email: BGC_Regulations@doj.ca.gov

Subject: Comments on Proposed Regulations Concerning Blackjack-Style Games; and Comments on Proposed Regulations Concerning Rotation of the Player-Dealer Position

To Whom It May Concern:

On behalf of Money Property Inc, I am writing to express serious concern regarding the California Department of Justice's proposed regulations related to blackjack-style games and the rotation of the player-dealer position.

These proposed changes would have far-reaching consequences, not only for card rooms like Seven Mile Casino but also for the broader Chula Vista community. I participate in several boards in town, including but not limited to the Kiwanis Club of Chula Vista, Chula Vista High School Foundation, Lighthouse Cares Foundation, and I participate in various community events. One common denomination is Seven Mile Casino; they really are a community partner. For example, to honor our fellow 9/11 responders the first to step up was Seven Mile Casino and have partnered with several businesses and community service clubs to serve our police, fire and hospitals breakfast, lunch and dinner to commemorate 9/11 and to say thank you for all the service they do. It costs each of our community groups who sign up for this and Seven Mile takes a lead and takes the largest group without batting an eye. They lead by example. We need more community organizations like Seven Mile that are willing to financially help our local projects.

The Attorney General's office approved and oversaw the games. The newly proposed rules — which seek to reclassify or prohibit long-standing games — appear to exceed the Department's authority and contradict established legislative intent.

I see this in real estate all the time. Every week there are new regulations imposed by the state and federal to keep well meaning ideas that are helping keep the community safe but do the extreme opposite and detriment our communities. I have HOA's that are struggling with the new SB326 and are devastating their already small projects. Savings cut down and now the community partner that I see around town that I know will be at events first one in line may be having to limit the

funding that they freely give to community projects like bike helmets for kids, scholarship partnerships and honoring our first responders will be going away? I have been in this community for 25 years and in that time, I have seen this repeatedly, this organization helps where others are not able to.

Most alarmingly, the DOJ's own economic impact study estimates these changes could result in over \$500 million in lost revenue statewide.


At the local level, these regulations would potentially translate into:

- A loss of critical tax revenue that supports essential city services.
- The elimination of jobs for hardworking Chula Vista residents
- A significant reduction in philanthropic contributions that sustain community programs.

Seven Mile Casino's game modifications must be assessed for their potential effects on the Chula Vista community. We urge the Department to fully account for the social and economic consequences these regulations could impose, not only on the card room operators but on the nonprofits, families, and neighborhoods that rely on their support.

Although the organizations I may belong to cannot formally take a stance on the regulations themselves, I can state that I have seen the impact Seven mile has had on Chula Vista firsthand. I am asking that the Department reject the proposed regulations. Thank you for your consideration.

Sincerely,



Mayra Swanson
President
Money Property Inc.



<https://www.nflalumni.org/chapter/northern-california/>

California Department of Justice, Bureau of Gambling Control
Attention: Regulations
2450 Del Paso Road, Suite 100
Sacramento, CA 95834
E-mail: BGC_Regulations@doj.ca.gov

**Re: Comments on Proposed Regulations Concerning Blackjack-Style Games.
Comments on Proposed Regulations Concerning Rotation of the Player-Dealer Position**

Dear Director Yolanda Morrow and Ms. Andreia McMillen:

On behalf of the **NFL Alumni NorCal "Caring for Kids"** organization in **Redwood City, CA**, we are writing to express our strong opposition to the proposed regulations concerning blackjack-style games and the rotation of the player-dealer position.

If adopted, these regulations would devastate the cardroom industry and threaten thousands of jobs across the state including in our city. These jobs are a critical lifeline for working families, particularly in underserved communities where economic opportunities are limited.

The economic impact to local governments would be equally severe. Cardrooms are a significant source of general fund revenue for several cities—funding vital services such as police, fire protection, emergency response, and park maintenance. Eliminating this revenue would force cities to make deep cuts that hurt residents and compromise public safety.

Now is not the time to destabilize a reliable economic engine. These proposed regulations are economically reckless and based on flawed assumptions, including the idea that displaced patrons will simply shift to tribal casinos. In reality, we risk driving gaming into illegal, unregulated operations, exacerbating crime and creating costly enforcement challenges for local jurisdictions.

Further, these regulations overstep the Bureau's authority and undermine a well-established, legally compliant industry that has operated safely and successfully for decades.

For these reasons, we strongly urge the Bureau to withdraw the proposed regulations as they will have a direct impact on Californians.

Sincerely,


of PR/Marketing



CA Department of Justice
Bureau of Gambling Control
Attention: Regulations
2450 Del Paso Road, Suite 100
Sacramento, CA 95834
Email: BGC_Regulations@doj.ca.gov

Subject: Comments on Proposed Regulations Concerning Blackjack-Style Games and Rotation of the Player-Dealer Position

To Whom It May Concern:

On behalf of San Diego Hunger Coalition, I write to share our experience and perspective as a community-based organization that has received consistent and impactful support from Seven Mile Casino.

Seven Mile Casino has been a key community partner in our efforts to address nutrition insecurity and advocate for legislative solutions to hunger in our region. Notably, they have sponsored our Legislative Forum, which brings together policymakers and stakeholders to highlight legislative priorities and explore sustainable strategies to end hunger across the County. This kind of support plays a vital role in ensuring that our advocacy and education efforts reach the right audiences and create meaningful dialogue.

In addition to sponsoring our Forum, Seven Mile Casino has generously provided their venue, at no cost, to host events that help us strengthen partnerships and raise funds for our programs. Their willingness to open their doors in this way has had a direct impact on our operational capacity and outreach.

Furthermore, Seven Mile Casino has served as a connector, helping us expand awareness about nutrition insecurity within the broader community and among key stakeholders. Their commitment to supporting initiatives that address local challenges is something we have experienced firsthand.

While we do not take a position on the proposed regulations concerning blackjack-style games and the rotation of the player-dealer position, we believe it is important to recognize the broader community role that card rooms like Seven Mile Casino play. Changes that may affect their operations could also affect the nonprofit organizations and local initiatives that benefit from their engagement.

Thank you for the opportunity to provide comments and for considering the real-world context in which responsible operators like Seven Mile Casino contribute to community wellbeing.

Sincerely,

Alondra Alvarado
President & CEO
San Diego Hunger Coalition



"Advancing diverse individuals on both the bench and the bar"

Date: May 29, 2025

Re: Seven Mile Casino

Representative for the Department of Justice:

On behalf of San Diego La Raza Lawyers Association ("SDLRLA"), I am writing to express the value of Seven Mile Casino ("Seven Mile") to our Association.

By way of background, SDLRLA's mission is to advance the cause of equality, empowerment and justice for Latino attorneys and the Latino community in San Diego County through service and advocacy. We are dedicated to promoting diversity on both the bench and bar. We support law students with mentorship programs and scholarships.

Seven Mile is a trusted partner, ally, and a vehicle for SDLRLA to impact the local community in many ways. For example, for the past two years Seven Mile Casino graciously hosted our annual Bar Stipend ceremony, providing monetary donations, a venue, and food for over 100 guests. (See links to articles below). The generosity of Seven Mile allowed our Association to save thousands of dollars in potential fees and costs related to venue and food expenses. The funds saved were used towards scholarships (Bar Stipend) for law students studying to take the California Bar Exam. The California Bar exam costs an estimated \$850.00 alone to take, and often requires people to not work while preparing for the exam. This past April, Seven Mile supported SDLRLA yet again by providing a monetary donation, a venue, and a hosted dinner for over 100 guests. With the support of Seven Mile and our other donors, our Association was able to award over \$35,000 in Bar Stipends.

- 2025 Bar Stipend Event: [Entrega SDLRLA 26 becas a estudiantes de leyes - El Latino](#)
- 2024 Bar Stipend Event: [San Diego La Raza Lawyers Association awards law students with bar stipend awards - Chula Vista Today](#)

As an ally, Seven Mile shared resources and connections with local leaders, officials, and media to spread the word about the programs that SDLRLA administers via its Public Benefit Fund (a 501(c)(3)). For example, upon learning of the various programs our Association offers to high school students and our community, Seven Mile connected SDLRLA with The San Diego Union Tribune. (See article below). Thanks to Seven Mile, SDLRLA highlighted the impactful programs the Public Benefit Fund champions, particularly the Trial Advocacy Program.

- 2024 Union Tribune Article: [There are not enough Latino lawyers or judges in San Diego. We created this program to change that. – San Diego Union-Tribune](#)

The Trial Advocacy Program reaches into the hearts of six high schools in lower socioeconomic neighborhoods. Our mission is clear: bolster existing high school mock trial programs and inspire high school students to set higher academic standards. At the mock trial program we provide invaluable mentorship, guiding students through the justice system's intricacies and nurturing them into future legal trailblazers.

In sum, we wholeheartedly extend this letter documenting the support Seven Mile provides to organizations such as SDLRLA in the hopes that their ability to support nonprofits like ours continues.

Respectfully,

/s/ Marco A. Garcia

President, San Diego La Raza Lawyers Association

President

Marco A. Garcia, Esq.

Vice President

Hector J. Tamayo, Esq.

Secretary

Claudia E. Murga, Esq.

Treasurer

Lara Deitz, Esq.

Immediate Past-President

Agustin Peña, Esq.

2023-2025 At-Large Directors

Alexander Kat, Esq.

Jessica Lujan, Esq.

Michelle Reynoso, Esq.

Alfredo Villegas, Esq.

Alejandro Echeverria, Esq.

2024-2026 At-Large Directors

Daniela Bellucco

Xavier Calvachi, Esq.

Ana De Santiago Ayon, Esq.

Fernando Rodriguez-Diaz, Esq.

Mariela Romo, Esq.

www.sdlrla.com



May 28, 2025

California Department of Justice
Bureau of Gambling Control
Attention: Regulations
2450 Del Paso Road, Suite 100
Sacramento, CA 95834

Subject: Comments on Proposed Regulations Concerning Blackjack-Style Games; and Comments on Proposed Regulations Concerning Rotation of the Player-Dealer Position

To Whom It May Concern:

On behalf of the South County Economic Development Council, I am writing to express sincere concern regarding the California Department of Justice's proposed regulations related to blackjack-style games and the rotation of the player-dealer position.

The proposed changes have far-reaching consequences, for card rooms like Seven Mile Casino and for the broader Chula Vista community. Seven Mile Casino is a trusted and vital community partner in Chula Vista, known for its steadfast support of local nonprofit organizations, youth programs, education initiatives, and public safety efforts. Their commitment to being a true community partner has made a meaningful difference in the lives of countless residents.

At the local level, these regulations would potentially translate into:

- A loss of critical tax revenue that supports essential city services.
- The elimination of jobs for hardworking Chula Vista residents.
- A significant reduction in philanthropic contributions that sustain community programs.

Given Seven Mile Casino's role as a trusted community partner, any changes to the games they operate must be carefully considered due to the real impact these changes will have on the Chula Vista community. We urge the Department to fully account for the social and economic consequences these regulations could impose, not only on the card room operators but on the nonprofits, families, and neighborhoods that rely on their support.

While our organization may not formally oppose the regulations, we respectfully request that the Department preserve the ability of responsible operators like Seven Mile Casino to continue their invaluable contributions to the health, stability, and wellbeing of Chula Vista.

Sincerely,

Jim O'Callaghan
President and CEO
South County Economic Development Council



SOUTHWESTERN COLLEGE FOUNDATION

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5/28/25

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Advisor – Erica Johnson
Foundation Director
Southwestern College Foundation

CA Department of Justice
Bureau of Gambling Control
Attention: Regulations
2450 Del Paso Road, Suite 100
Sacramento, CA 95834
Email: BGC_Regulations@doj.ca.gov

Subject: Comments on Proposed Regulations Concerning Blackjack-Style Games; and Comments on Proposed Regulations Concerning Rotation of the Player-Dealer Position

To Whom It May Concern:

On behalf of the Southwestern College Foundation, I am writing to express how valuable our relationship with Seven Mile Casino has become and the wonderful work they do supporting our local community.

Seven Mile Casino is a trusted and vital community partner here in Chula Vista, known for its steadfast support of local nonprofit organizations, youth programs, education initiatives, and public safety efforts. Their commitment to being a true community partner has made a meaningful difference in the lives of countless residents and students at Southwestern College.

Given Seven Mile Casino's integral role as a trusted community partner, any changes to the games they operate must be carefully considered considering the very real impacts these changes will have on the Chula Vista community.

Thank you for the opportunity to comment.

Sincerely,

Erica Johnson
Foundation Director
Southwestern College Foundation

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The Southwestern College Foundation, established in 1982, is a charitable 501(c) 3 organization that exists solely to benefit Southwestern College.

To: [BGC Regulations](#)
Subject: Comments on Proposed Regulations Concerning Blackjack-Style Games; and Comments on Proposed Regulations Concerning Rotation of the Player-Dealer Position
Date: Tuesday, May 27, 2025

May 27, 2025

CA Department of Justice
Bureau of Gambling Control
Attention: Regulations
2450 Del Paso Road, Suite 100
Sacramento, CA 95834

Via Email

Subject: Comments on Proposed Regulations Concerning Blackjack-Style Games; and Comments on Proposed Regulations Concerning Rotation of the Player-Dealer Position

To Whom It May Concern:

I am writing to express serious concern regarding the California Department of Justice's proposed regulations related to blackjack-style games and the rotation of the player-dealer position.

These proposed changes would have far-reaching consequences, not only for card rooms like Seven Mile Casino but also for the broader Chula Vista community, especially the southwestern portion that I represent as a Trustee of the Sweetwater Union High School District. Seven Mile Casino is a trusted and vital community partner here in Chula Vista, known for its steadfast support of local nonprofit organizations, youth programs, education initiatives, and public safety efforts. Their commitment to being a true community partner has made a meaningful difference in the lives of countless residents.

For decades, the games in question have been approved and overseen by the Attorney General's Office. The newly proposed rules — which seek to reclassify or prohibit long-standing games — appear to exceed the Department's authority and contradict established legislative intent. Most alarmingly, the DOJ's own economic impact study estimates these changes could result in over \$500 million in lost revenue statewide.

At the local level, these regulations would potentially translate into:

- A loss of critical tax revenue that supports essential city services

- The elimination of jobs for hardworking Chula Vista residents
- A significant reduction in philanthropic contributions that sustain community programs

Given Seven Mile Casino's integral role as a trusted community partner, any changes to the games they operate must be carefully considered considering the very real impacts these changes will have on the Chula Vista community. We urge the Department to fully account for the social and economic consequences these regulations could impose, not only on the card room operators but on the nonprofits, families, and neighborhoods that rely on their support.

While our organization may not formally oppose the regulations, we respectfully request that the Department preserve the ability of responsible operators like Seven Mile Casino to continue their invaluable contributions to the health, stability, and wellbeing of Chula Vista.

Thank you for the opportunity to comment.

Sincerely,

Rudy Lopez
Trustee
Sweetwater Union High School District

United Gaming Solutions, LLC
03-20-2025

Department of Justice

Andrea McMillen, Staff Services Manager
Yolanda Morrow, Director

Bureau of Gambling Control
P.O. Box 168024
Sacramento, CA 95816-8024

Subject: **Ongoing Challenges to Pure 21.5 and the Future of Cardroom Gaming**

Dear Ms. McMillen and Director Morrow:

My name is Steven Wright, and I am writing to you not as a corporate entity or a high-powered industry lobbyist, but as a small business owner and innovator who has spent the better part of the last two decades working within the regulations your office set forth. I've followed the rules, adapted when required, and worked to create fair and compliant games for California's cardrooms. But lately, I can't help but feel like the rules keep changing, and each change leans suspiciously in favor of tribal gaming interests at the direct expense of people like me.

To be blunt—where does it stop? What assurance do I have that, after years of operating within the framework set forth by the DOJ, the goalposts won't simply be moved again? The current challenge to Pure 21.5 and the broader argument against player-dealer positions are just the latest in a long trend of shifting interpretations that favor one side over another.

Let's take a step back. The game called 21, was historically an unfair game, leading to its ban in California. Over time, it evolved into the widely recognized form played in Nevada, which was later included in the tribal gaming compacts. But well before that, California cardrooms operated within state law, creating variations of table games that followed the fundamental principle that any player could opt to take the player-dealer position. This model was scrutinized, challenged, and ultimately permitted within specific guidelines. In that process, the DOJ established criteria defining what does and does not constitute 21. It was made clear that the best possible hand cannot be a total of 21, and exceeding 21 cannot result in an automatic loss.

With these definitions in mind, I developed Pure 21.5 using a unique, non-standard deck where face cards were replaced with Bonus cards, which have different values depending on the card they are paired with on the initial draw. This 21.5 technology is not public domain.

Pure Spanish 21.5 was approved with the same 21.5 technology several years later, utilizing a modified deck of only 48 cards with four bonus cards removed and thereby creating even another game that did not conform to the traditional math of 21. This created another distinctive, DOJ-approved alternative. These games have been played legally in California cardrooms for nearly 20 years. If these games were such a threat to mega tribal casinos, why haven't the tribes switched to Pure 21.5 and Pure Spanish 21.5 themselves?

This leads to my core concerns.

The moving goalposts problem is another major concern. If we modify our games to meet new standards today, what prevents another reinterpretation tomorrow? What protections do small vendors like me have from arbitrary reclassification? I have no idea what the tribes will have a problem with next?

I receive a call several years ago from the BGC office saying that the tribes have complained that they didn't like my game name Pure 21.5 blackjack. My response was the trademark office granted me a register trademark which distinguished it from the mark of blackjack. By using Pure 21.5 Blackjack it distinguishes it from the game of 21 letting the public know that these games are very different, The BGC said thank you for the information.

It takes time (2 years) min and a significant amount of investment capital to develop a game that makes it farther enough along to even go forward the BGC approval stage. There's zero guarantee that this "new" game will be successful and have a return on investment.

Let's start with just one of the DOJ's many new guidelines mandates that the player-dealer must win all ties. This is not just arbitrary—it's punitive. No rational player would take the player-dealer position with a 20%+ disadvantage. I don't believe your office has done any math or game theory on any of these new rules that are proposed. It's critical for the BGC to do the basics to understand the rules there asking the public to follow while developing new games. I believe you're getting bad advice from the tribes; they're just making up game rules at this point. These unrealistic and misguided BGC regulations need to have a full review in committee.

The DOJ has allowed tribal casinos to create modified versions of games like roulette and craps, even though these games were not explicitly approved in the original gaming compact. Yet, the DOJ takes the stance that my game is too close to 21 while failing to apply the same scrutiny to these too close to roulette and craps variations.

As you know, on November 8th of 2022, the voters of California defeated Proposition 26 in the midterm election. Proposition 26's Yes/No Statement, as written on the ballot, included the following language:

YES/NO STATEMENT

A YES vote on this measure means: Four racetracks could offer in-person sports betting. Racetracks would pay the state a share of sports bets made. Tribal casinos could offer in-person sports betting, roulette, and games played with dice (such as craps) if permitted by individual tribal gambling agreements with the state. Tribes would be required to support state sports betting regulatory costs at casinos. People and entities would have a new way to seek enforcement of certain state gambling laws.

A NO vote on this measure means: Sports betting would continue to be illegal in California. Tribal casinos would continue to be unable to offer roulette and games played with dice. No changes would be made to the way state gambling laws are enforced.

The voters of California have spoken, and more than two-thirds chose to vote no on Proposition 26. Their no vote expressly indicated their preference that “No changes would be made to the way state gambling laws are enforced” yet the Department of Justice has expressed the intent to change the landscape for game acceptability in the state. These changes not only unfairly punish the card rooms but also fail to address the similar conduct of tribal casinos.

Roulette, specially named in California Penal Code § 330, is a prohibited game. California voters overwhelmingly defeated Proposition 26 and denied tribal casinos the option of including roulette in their compacts with the state, yet the game is currently allowed, played, advertised, and offered by tribal casino throughout California. Regardless of the types of changes made to their modified game versions, there is no mathematical differentiation from the disallowed game of roulette as it has been played in casinos around the world for centuries.

Let’s look at the Roulette game the tribes are using versus/ Vegas Roulette:

- The only difference in tribal roulette is a minor modification to the wheel—there is no ball,
- The wheel has numbers on it in the same order /colors used by Vegas roulette wheels.
- When the wheel stops the winning number is revealed.
- The odds, payouts, and betting options remain the same.
- The red/black number combinations, zero(s), and felt layout are the same.
- The style of chips and the “chipper” used to stack them are the same.

Why the double standard?

I am not advocating that these games be outlawed—far from it. I believe the tribes should be able to offer their variations of roulette and craps, just as I should be allowed to offer my 21 variants. The problem is that the DOJ applies one set of rules to the tribes and another to cardrooms.

To highlight the inconsistency, my game introduces significant differences. Pure 21.5 features a No Bust option, altering the game odds depending on the bust rule used. It utilizes a modified deck (modified gaming equipment) and does not reward 21 as the best hand. Meanwhile, tribal casinos offer versions of roulette and craps with modified dice or wheels (also modified gaming equipment), yet these games retain the exact same odds and payouts as their Vegas counterparts. At least my game implements advanced 21.5 technology and real rule changes that affect game odds.

Why does the DOJ scrutinize my innovation while allowing the tribes to effectively offer roulette and craps under different names?

Additionally, the DOJ has long held that no blackjack variant offered in California cardrooms can use the word “blackjack.” Yet, Pure 21.5 Blackjack is a registered trademark, which legally distinguishes it from the public domain use of the word ‘Blackjack.’ Meanwhile, tribal casinos are free to market their versions of roulette and craps under those exact names. Why are these rules applied inconsistently?

If the DOJ truly considers the tribal versions of these games distinct from their Vegas counterparts, then by that logic, shouldn’t cardrooms also be allowed to offer those same variations?

I have played by the rules, yet I constantly find myself fighting for the right to exist while the other side enjoys every advantage. The DOJ is supposed to uphold fairness in gaming, not allow political pressures to dictate outcomes. I have always believed that the BGC was above such influence.

I am asking for a straightforward, good-faith discussion. Cardrooms are a longstanding part of California's gaming landscape. Our innovations, including Pure 21.5, were developed under clear DOJ guidelines and have been played in the market for decades. I would like to know why those guidelines now seem to be shifting against us and what guarantees exist to prevent further arbitrary redefinitions in the future.

Sincerely,

Steven Wright Inventor of Pure 21.5 Blackjack



May 27, 2025

California Department of Justice, Bureau of Gambling Control
Attn: Regulations
2450 Del Paso Road, Suite 100
Sacramento, CA 95834
E-mail: BGC_Regulations@doj.ca.gov

**Re: Comments on Proposed Regulations Concerning Blackjack-Style Games;
Comments on Proposed Regulations Concerning Rotation of the Player-Dealer Position**

Dear Director Yolanda Morrow and Ms. Andreia McMillen:

On behalf of the West Ventura County Business Alliance, a business organization made up of over 500 business organizations in the greater Oxnard-Camarillo area, we are writing to express our strong opposition to the proposed regulations concerning blackjack-style games and the rotation of the player-dealer position.

If adopted, these regulations would devastate the cardroom industry and threaten thousands of jobs across the state including in our city. These jobs are a critical lifeline for working families, particularly in underserved communities where economic opportunities are limited.

The economic impact to local governments would be equally severe. Cardrooms are a significant source of general fund revenue for several cities—funding vital services such as police, fire protection, emergency response, and park maintenance. Eliminating this revenue would force cities to make deep cuts that hurt residents and compromise public safety.

With the likelihood of significant cuts in Federal revenue and a major deficit in the State budget, now is not the time to destabilize a reliable economic engine. These proposed regulations are economically devastating and based on flawed assumptions, including the idea that displaced patrons will simply shift to tribal casinos. In reality, we risk driving gaming into illegal, unregulated operations—exacerbating crime and creating costly enforcement challenges for local jurisdictions.

Further, these regulations overstep the Bureau's authority and undermine a well-established, legally compliant industry that has operated safely and successfully for decades.

For these reasons, we strongly urge the Bureau to withdraw the proposed regulations as they will have a direct impact on Californians.

Sincerely,

Andy Conli
President & CEO
West Ventura County Business Alliance



May 22, 2025

California Department of Justice, Bureau of Gambling Control
Attention: Regulations

Submitted via email only to: BGC_Regulations@doj.ca.gov

Re: Comments on Proposed Regulations Concerning Blackjack-Style Games and Rotation of the Player-Dealer Position

Dear Director Yolanda Morrow and Ms. Andreia McMillen:

I am writing on behalf of the Yes on Measure P campaign in Chula Vista to express strong opposition to the draft regulations proposed by the Bureau of Gambling Control on April 11, 2025. These regulations, which would restrict or eliminate blackjack-style and player-dealer games, pose a direct and serious threat to Seven Mile Casino — a long-standing and respected institution in our community.

Seven Mile Casino has been a vital economic engine and philanthropic leader in Chula Vista for more than two decades. It provides high-quality, living-wage jobs, many of which are filled by local residents, and provides the city much needed tax revenue that directly fund essential city services, including public safety, infrastructure, and community programming.

In addition to its economic role, Seven Mile Casino is a generous community partner. The organization has consistently invested in nonprofits, civic initiatives, and campaigns like Measure P — efforts that reflect the shared values and aspirations of Chula Vista residents. The proposed regulations would severely limit the Casino's ability to continue this community support.

The Department's own economic analysis predicts a \$500 million drop in statewide revenue. Communities like ours would be disproportionately impacted, as we rely on stable, legal operations like Seven Mile Casino to meet pressing needs.

On behalf of our campaign and the many residents who have benefited from Seven Mile Casino's contributions, we respectfully urge you to reconsider these proposed regulations and preserve the stability, jobs, and community investments that are at risk.

Sincerely,

Victor Avina
Committee Chair

YES on P – Keep Chula Vista Clean and Safe



YMCA OF SAN DIEGO COUNTY
**COMMUNITY
WELL-BEING**
& BELONGING

May 26, 2025

To: CA Department of Justice
Bureau of Gambling Control
Attention: Regulations
2450 Del Paso Road, Suite 100
Sacramento, CA 95834
Email: BGC_Regulations@doj.ca.gov
Subject: Letter of Support for Seven Mile Casino

To Whom It May Concern:

On behalf of the South Bay Family YMCA, I am writing to express our support of **Seven Mile Casino**.

We respect the Department's role in regulating gaming activities and believe it is essential to recognize the broader implications any changes changes may have—particularly on community-focused card rooms like **Seven Mile Casino**, which plays a vital and positive role in our region.

Seven Mile Casino has long been a committed and generous partner in Chula Vista. Their ongoing support of local nonprofits, youth programs, educational initiatives, and environmental efforts has had a profound effect on countless individuals and families. In an area where such support can be challenging to secure, the contributions of Seven Mile Casino have filled critical gaps and strengthened the fabric of our community.

For more than a decade, the South Bay Family YMCA has benefited from both financial and in-kind support from Seven Mile Casino. Their partnership has enabled us to expand our reach and enhance the services we offer to local youth and families.

As changes to card room operations are considered, we urge the Department to carefully weigh the potential ripple effects these regulations may have—not just on businesses, but on the nonprofit organizations, neighborhoods, and families that rely on the support of community-minded partners like Seven Mile Casino.

We appreciate your time and thoughtful consideration of the broader community impacts associated with these proposed regulations.

Sincerely,

Laura Muñoz Humphreys
Regional Executive Director
YMCA of San Diego County-Border View Family YMCA & South Bay Family YMCA