



# Napa Valley Casino

P.O. Box 10078 American Canyon, CA 94503 | (707) 644-8851

November 20, 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,

As the owner of Napa Valley Casino in American Canyon California, I am writing to let you know of our extreme opposition to any proposed regulations that would limit any card room's ability to wave our collection fees to our customers.

Every card room in California is in business to prosper. We all want to make as much money as we possibly can. Therefore, as responsible licensed business owners we set our collection fees to what *our individual markets will allow*.

Just as real estate prices change from market to market, so does the price of gaming. Real estate prices in the Financial District in San Francisco demand a premium, but the same amount of real estate in a rural area of Bakersfield does not. So why would gaming be any different? Large card rooms in expensive real estate markets have higher overhead, but attract more affluent players who can afford to pay more. However, smaller card rooms in smaller markets usually operate with less overhead but attract much less affluent customers. So setting a one size fits all regulation on pricing defeats the laws of economics.

As we know from history, when the laws of economics are challenged, businesses go bankrupt and once self sufficient employees end up on welfare. Communities that have depended on the economic engine of the lost business suffer as my city of American Canyon would. As one of the largest, if not the largest, single tax paying business in the city, Napa Valley Casino is relied upon for tax revenue that pays for our police force and fire fighters.

As a card room, we are already fighting an uphill battle for gaming entertainment in California against massive tribal casinos that can offer the customer so many more choices of gaming and entertainment. The only way we have been able to stay in business and keep our employees employed with benefits is to constantly find new ways to be competitive. This usually means that we either spend more money or make less. We would all like to spend less and make more, but *it is what we need to do for us to stay in business*. These proposed regulations, mandating that I charge my customers an unnecessary collection fee would drastically limit our ability to operate.

If regulations came into effect that would require I must charge my customers certain fees, I would be put at such a massive competitive disadvantage the likelihood of going out of business would be very high. Simply, if I am required by law to charge my customers a fee that my competition is not required to charge (and does not charge) they will not be my customers any longer. If a customer has a choice of whether they are going to pay a collection fee per wager or not, they will always prefer the casino that does not charge a collection fee.

Since 1969 Napa Valley Casino has provided gaming entertainment to the local citizens of the community. It currently provides living wage jobs to almost one hundred Californians (most of whom are in a minority classification with few other job skills) that could not find living wage jobs in our community if their jobs were lost because of these proposed regulations.

No other business in California is forced by law to charge their customers while allowing their competitors the ability not to.

There is no rational basis to demand such a discriminatory regulation at the demand of the multi-billion dollar tribal casino industry that wants to stomp out our small business.

These proposed regulations are blatant regulatory price fixing that will cost thousands of good jobs to hard working California citizens who support their families. Thousands upon thousands of family members rely on those employees for housing, food, health care etc. So many lives would be devastated by a regulation that would only serve to benefit a *very small number of already extremely wealthy* tribal members.


Is the loss of so many jobs, the devastation of our families and our cities abilities to keep police and fire departments staffed worth it so a few ultra rich, that do not pay taxes, can make a few dollars more?

I think you would agree that it is not.

Our collection rates are posted in our card rooms only after they are approved by the Bureau of Gambling Control. There is no sound reason why we should not continue to be able to offer rates that our market will afford us, including a rate of zero for players not playing as the Player/Dealer.

I appreciate you taking the time to read this letter and thank you for your consideration of this matter.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Brian Altizer', with a long horizontal flourish extending to the right.

Brian Altizer  
Owner, Napa Valley Casino