



SHINGLE SPRINGS BAND
OF MIWOK INDIANS

Shingle Springs Rancheria
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VIA U.S. AND ELECTRONIC MAIL
(susanne.george@doj.ca.gov)

November 21, 2014

Ms. Susanne George
Bureau of Gambling Control
Department of Justice
P.O. Box 168024
Sacramento, CA 95816

Re: Proposed Amendment to Gaming Activity Authorization Regulation

Dear Ms. George:

The Shingle Springs Band of Miwok Indians appreciates the opportunity to comment on the Bureau's proposed amendment to the Gaming Activity Authorization regulation to address concerns regarding collection fees in California cardrooms.

Our comments are general in nature, rather than specifically tailored to the three options proposed by the Bureau. We urge the Bureau to adopt an amended regulation that requires compliance with state law, which except in two very limited circumstances requires all players in a game to pay collection fees at the same rate for the same level of wager.

Any waiver of collection fees should comply with the Penal Code, which does not allow the wholesale waiver of those fees. Rather, the Penal Code only permits the waiver of a collection fee for a particular round of play when the player receives no action on his hand or when a hand folds and there is no betting. Further, the fixed collection fee should increase in general proportion to the amount wagered, but should not be a percentage of the wager or winnings, and the fee should not be so small as to effectively avoid the statutory fee requirement.

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

Thank you for considering our comments.

Sincerely,

Tim Adams
Shingle Springs Tribal Gaming Commission Chairperson