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April 15, 2016

Shannon M. Paresa  
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**FOR DEPARTMENT OF JUSTICE,  
SENT VIA E-MAIL TO:  
[Susanne.George@doj.ca.gov](mailto:Susanne.George@doj.ca.gov)**

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

**FOR OFFICE OF ADMINISTRATIVE LAW,  
SENT VIA FACSIMILE TO:  
(916) 323-6826**

Office of Administrative Law  
300 Capitol Mall, Suite 1250  
Sacramento, CA 95814

Re: **Comments to Emergency Regulations  
Title 11, Division 3, Chapter 1, Article 8 –  
Major League Sports Raffle Program**

Dear Ladies and Gentlemen:

On behalf of our client, Anschutz Entertainment Group, Inc., owner of a Major League Hockey Team (the Los Angeles Kings) which has an affiliated nonprofit that is a potential “eligible organization” under Section 320.6 of the California Penal Code (“Penal Code”), we submit the following comments to the above-referenced emergency regulations:

- In Section 2081(ae), please clarify whether “unpaid volunteer” includes a person who receives compensation from someone other than the eligible organization or the eligible recipient organization (for example, a person with an employment or a business relationship with the major league sports team).
- In Section 2089(e), the regulations are unclear as to what is considered a designated family section. For example, is it an area that is marked as a family section by the major league team when selling tickets or is it an area where families are allowed to buy tickets?

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Please contact the undersigned if you have any questions regarding these comments. Thank you for your consideration.

Very truly yours,

A handwritten signature in black ink that reads "Shannon M. Paresa". The signature is written in a cursive, flowing style.

Shannon M. Paresa  
of RODRIGUEZ, HORII, CHOI & CAFFERATA LLP

cc: Janice Nichols, Anschutz Entertainment Group, Inc.  
Dwayne M. Horii