



# BLUE LAKE TRIBAL GAMING COMMISSION

428 CHARTIN ROAD • P.O. BOX 798

BLUE LAKE, CA. 95525

707.668.5300 • FAX 707.668.5500

[www.bluelakecasino.com](http://www.bluelakecasino.com)



April 16, 2012

To: Beth Miller

RE: CGCC, Little Hoover Commission

RE: Testimony for April 24, 2012

Ms. /Mrs. Miller,

Here is a brief description of the testimony that I'll be providing on 24<sup>th</sup>. First, it is my belief that consolidation of the CGCC functions as described in the March 30<sup>th</sup>, 2012 plan submitted to the Little Hoover Commission is a good idea in that it not only allows for all the benefits associated with decreased costs for reducing duplicated efforts, but also will result in more effective regulatory efforts from the State.

The current system is duplicative:

Currently, the Department Of Justice Bureau of Gambling Control and the California Gambling Control Commission share nearly identical foundational beliefs as to why they were created and what it is that they are tasked to accomplish. This is evidenced by their; mission, vision and values statement(s). In my experience as a Tribal regulator both groups have been tasked with the similar work (counting devices). And while agents from the DOJ are the solely responsible for investigating gaming and CA PC crimes, nothing would preclude them from performing any task that a CGCC agent would perform at a Tribal casino (counting devices, MICS review, Compact compliance review). Thus, it makes good sense that the administrative, investigative and enforcement not be duplicated in two separate locations in State government.

[http://www.cgcc.ca.gov/?pageID=strategic\\_plan](http://www.cgcc.ca.gov/?pageID=strategic_plan)

<http://oag.ca.gov/gambling>

Consolidation makes regulation promulgation more sensitive to industry needs:

Cooperation through closer contact:

Casino style gaming in CA needs regulatory cooperation between the Tribal Gaming Regulatory Agencies (TGRAs) and the State. Currently, the regulatory relationship between Tribes and the CGGC is distant. In my experience, I can say that for the last 11 years I've had no relationship with the CGCC other than; they briefly attended a regulatory conference in Blue Lake in 2006, and I've had 3 telephone conversations with CGGC representatives over the years. I have conversations with the CA DOJ BG agents at least a couple times a month, and I know all of the



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agents on a first name basis. I cannot tell you today who anyone is at the CGCC. My belief is that having the CGCC consolidated into the DOJ will bring regulatory promulgation closer to the street. By being in the DOJ the CGCC can be in closer day to day contact with TGRAs by listening to agent(s) reports, and by utilizing the DOJ's regional agent network to gather and disseminate information. This would have a real benefit in understanding the daily challenges of casino regulation and meaningful regulations could then be proposed by the CGGC. A model of this already exists Federally with the NIGC (National Indian Gaming Commission) who holds; Tribal government consultations, and forms TACs (Tribal Advisory Committees) to gather information and insight when considering rulemaking changes.

Industry challenges mandate better cooperation:

There is a silent technological revolution occurring in casino gaming. Class 3 gaming devices are being developed in smaller platforms. Data transmission linking; devices, players club servers, progressive jackpots, and players is changing. Internet gaming is now on the horizon.

California's tech companies are in an ideal position to facilitate these changes in casino gaming. Some are already participating. We have the ability in this State to lead this industry, and reap the benefits of doing so. What is needed in CA is regulatory authority that can keep pace with the current industry changes. It is the biggest challenge in gaming. My belief is that this can only happen if TGRAs and the State regulators work collaboratively. Having the CGGC in the DOJ is the first step in accomplishing that goal.

Sincerely,

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*Jason Ramos, D.C., TGC Chairman*