



February 25, 2025

***Via e-mail only***

Dan Haverty  
Interim City Manager  
City of Folsom  
50 Natoma Street  
Folsom, CA 95630  
[dhaverty@folsom.ca.us](mailto:dhaverty@folsom.ca.us)

Re: City of Folsom – Ordinance Amendments

Dear Mr. Haverty:

On February 7, 2025, the Department of Justice (Department), Bureau of Gambling Control (Bureau) received correspondence from the City of Folsom (City) regarding the City's further proposed amendments to its Municipal Code.<sup>1</sup> The City submitted the proposed amendments to the Bureau for review in compliance with the City's obligations under the Gambling Control Act (Act).<sup>2</sup>

The City proposes amending Section 5.20.050, subdivision (C),<sup>3</sup> which governs both the number of gambling establishments<sup>4</sup> allowed within the City and the number of licenses that

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<sup>1</sup> The Bureau provided comments to the City concerning other proposed amendments in a letter dated February 7, 2025. The proposed amendments addressed herein were made in response to those comments.

<sup>2</sup> "Any amendment to a city or county ordinance relating to gambling establishments, or the Gambling Control Act, shall be submitted to the [D]epartment for review and comment, before the ordinance is adopted by the city or county." (Bus. & Prof. Code, § 19961.1.)

<sup>3</sup> Section references are the City's Municipal Code unless otherwise indicated.

<sup>4</sup> Section 5.20.010 includes a definition for "cardroom," which the Bureau acknowledges is synonymous with the definition of "gambling establishment" under the Act. (Bus. & Prof. Code, § 19805, subd. (o).)

may be issued by the City, as well as Section 5.20.070, subdivision (A)(2), which governs the number of tables allowed within a gambling establishment within the City. The Bureau offers the following comments.

**1. Section 5.20.050 – Action on application**

Section 5.20.050, subdivision (C) currently provides, in pertinent part, that “no cardroom license shall be granted when the number of cardroom licenses in the city exceeds the ratio of one cardroom for each two thousand five hundred persons in the city.” The City’s proposed amendment would instead provide that no more than one cardroom is permitted in the City, and that only one cardroom license may be issued by the City.

This proposed amendment appears to comply with the Act, and addresses the concerns raised by the Bureau in its February 7, 2025 comment letter.

**2. Section 5.20.070 – Cardroom regulations**

Section 5.20.070, subdivision (A)(2), currently specifies that “[n]o more than eleven card tables shall be permitted in any cardroom.” The City proposes to amend this subdivision to specify that no more than thirteen (13) “card tables” are allowed within a cardroom, and no more than thirteen (13) “card tables” are allowed in the City. (Section 5.20.070, subd. (A)(2).) The proposed increase of two tables is authorized under Business and Professions Code section 19961.07, subdivision (a). This proposed amendment appears to comply with the Act.

While the Bureau is required to review and comment upon proposed ordinance amendments, nothing contained herein shall be construed to authorize the operation of a gambling establishment in any manner that is inconsistent with the Act or any other applicable provision of law.

If you have any questions, or wish to submit further revisions to these ordinances, please contact Analyst Kenneth Larsen at (916) 559-6103, or by email at [kenneth.larsen@doj.ca.gov](mailto:kenneth.larsen@doj.ca.gov). Thank you for your cooperation regarding this matter.

Sincerely,

**Brent Y. Jo**

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Y. Jo  
Date: 2025.02.25 11:06:26  
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BRENT Y. JO  
Deputy Attorney General

For ROB BONTA  
Attorney General