



May 11, 2026

***Via e-mail only***

Christopher A. Callihan  
City Attorney  
City of Salinas  
200 Lincoln Avenue  
Salinas, CA 93901  
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Re: City of Salinas – Ordinance Amendments

Dear Mr. Callihan:

On April 6, 2026, the Department of Justice (Department), Bureau of Gambling Control (Bureau) received your email regarding the City of Salinas's (City) proposed amendments to its Municipal Code. These proposed amendments were submitted to the Bureau for review in compliance with Business and Professions Code section 19961.1, and for the Bureau to evaluate the proposed amendments to the City's Municipal Code in light of the restrictions and limitations contained in the Gambling Control Act (Act).<sup>1</sup>

The City proposes amending sections 5-15.16 and 5-15.17 of the Municipal Code, which govern, among other things, the number of tables allowed within a gambling establishment located within the City. The Bureau offers the following comments.

**1. Section 5-15.16 – Number of card room permits and card tables limited.**

Section 5-15.16,<sup>2</sup> subdivision (b) currently specifies, among other things, that a maximum of eleven card tables, with one dealer per table, shall be allowed to operate in the city. The City proposes amending section 5-15.16 to allow for increases to the maximum table limit pursuant to Business and Professions Code section 19961.07. The amendment proposes the following language:

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<sup>1</sup> The Bureau previously provided a comment letter to the City on March 24, 2026, addressing a similar proposed amendment to section 5-15.16.

<sup>2</sup> Section references are to the City's Municipal Code unless otherwise indicated.

On or after the effective date of this ordinance, a licensed card room shall be allowed to increase the number of gaming tables operated in the card room by up to two (2) additional tables above the number of tables operated in the card room on January 1, 2023. With this increase, no more than thirteen (13) tables shall be permitted in any one card room. Thereafter, on or after each four (4) year anniversary of the effective date of this ordinance, a licensed card room shall be allowed to further increase the number of gaming tables operated in the card room by up to two (2) additional tables, not to exceed ten (10) additional tables above the number of tables operated at the licensed card room on January 1, 2023. With these subsequent increases, no more than twenty-one (21) gaming tables shall be permitted in any one card room, as follows.

The City also proposes amending section 5-15.17, subdivision (a)(2) to specify that the maximum number of tables allowed shall not exceed the number allowed under section 5-15.16, subdivision (b).

As drafted, the proposed amendment to section 5-15.16 appears to comply with the Act with respect to Business and Professions Code section 19961.07, subdivision (a)(2), and the timing of additional tables. And, the proposed amendment to section 5-15.17, subdivision (a)(2), addresses the concerns described in the Bureau's March 24, 2026 comment letter.

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 Vanessa Jimenez at (916) 830-9045, or by email at [vanessa.jimenez@doj.ca.gov](mailto:vanessa.jimenez@doj.ca.gov). Thank you for your cooperation regarding this matter.

Sincerely,

**Brent Y. Jo**

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Jo  
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BRENT Y. JO  
Deputy Attorney General

For ROB BONTA  
Attorney General