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7 J. BLONIEN, APLC
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11 Attorneys for Plaintiffs and Petitioners

12
13 SUPERIOR COURT OF THE STATE OF CALIFORNIA

14 FOR THE COUNTY OF SACRAMENTO

15 GORDON D. SCHABER COURTHOUSE

16 LUCKY CHANCES, INC.; V C CARDROOM,
INC.; HALCYON GAMING, LLC; PACIFIC
17 GAMING SERVICES, LLC; BJ GAMING,
LLC; FORTUNE PLAYERS GROUP, INC.;
18 GOLD GAMING CONSULTANTS, INC.;
CERTIFIED PLAYERS, INC.; LE GAMING,
19 INC.; and RHINO GAMING INC., on their
own behalf and on behalf of those similarly
20 situated,

21 Plaintiffs and Petitioners,

22 vs.

23 THE STATE OF CALIFORNIA;
CALIFORNIA GAMBLING CONTROL
24 COMMISSION; BUREAU OF GAMBLING
CONTROL, A DIVISION OF THE
25 CALIFORNIA DEPARTMENT OF JUSTICE;
FIONA MA, in her official capacity as the State
26 Treasurer; and DOES 1 through 20, Inclusive,

27 Defendants and Respondents.
28

ELECTRONICALLY FILED
Superior Court of California
County of Sacramento
06/09/2025
By: S. Woltmon Deputy

Case No. 34-2020-80003510-CU-WM-GDS

Judge: James P. Arguelles

**DECLARATION OF JARHETT BLONIEN
IN SUPPORT OF PLAINTIFFS' MOTION
FOR PRELIMINARY APPROVAL**

DATE: September 5, 2025

TIME: 11:00 a.m.

DEPT: 32

[Filed Concurrently With Notice of Motion and
Motion; Memorandum of Points and
Authorities; Declarations of Lucas K. Hori;
[Proposed] Order]

Action Filed: 5/12/2020

Trial Date: TBD

1 J. Blonien, APLC, following in the footsteps of my father who also served as counsel for, and
2 lobbied on behalf, of gaming clients. I am extremely familiar with regulation in the California
3 gaming industry, including the statutes and regulations that set licensing and annual regulatory fees.
4 A profile with my experience is attached to this Declaration as *Exhibit 10*.

5 7. J. Blonien, APLC also intends to staff Danielle Guard on this matter. Ms. Guard is
6 Of Counsel at J. Blonien, APLC and graduated from the University of the Pacific's McGeorge
7 School of Law in 1994. Consistent with our firm's practice, she likewise regularly represents
8 gaming industry clients and has deep familiarity with the regulations and fees relevant to the
9 industry. A profile with her experience is attached to this Declaration as *Exhibit 11*.

10 8. Together with Rutan & Tucker, LLP (with J. Blonien, APLC, "Class Counsel"), my
11 firm is amply experienced and qualified to serve as class counsel. As set forth further in the
12 concurrently filed Declaration of Lucas K. Hori, Rutan & Tucker is well-equipped to represent
13 clients in complex litigation, including class actions and governmental and regulatory matters
14 involving challenges to allegedly improper or excessive regulatory fees. J. Blonien, APLC
15 compliments this background with its focus on the specialized gaming industry. J. Blonien, APLC
16 is well-situated to advise the proposed class on issues relating to the challenged regulatory fees and
17 their historical and legislative background. Further, J. Blonien, APLC has existing client
18 relationships with representative members of the proposed class, and can therefore facilitate the
19 efficient management of this litigation.

20 9. J. Blonien, APLC has, to date, worked diligently to represent the interests of the
21 proposed class. Attorneys at our office have spent many hours litigating this case. Since 2020, we
22 have collaborated with Rutan & Tucker to research and assist with preparing and filing Plaintiffs'
23 class action complaint. We have likewise collaborated with Rutan & Tucker to propound written
24 discovery, to provide input and guidance on settlement and strategic matters, and to prepare for class
25 certification.

26 10. Apart from formal discovery, the parties also engaged in ongoing informal exchanges
27 relating to settlement, including with respect to fees paid and the Gambling Control Fund's reserve.
28 The parties extensively negotiated terms of the compromise ultimately memorialized in their

1 settlement (the “Settlement”).

2 11. Defendants provided an initial written settlement offer on August 8, 2022.
3 Thereafter, the parties engaged in arm’s-length settlement negotiations for months. Among other
4 things, the negotiations focused on reaching a settlement amount which would (1) pay out from the
5 Gambling Control Fund the maximum available amount based on Plaintiffs’ position the reserve
6 money in the Fund had been wrongfully collected, while (2) leaving the Fund with an operational
7 reserve acceptable to the Bureau and Commission for going-forward operations. Negotiations
8 focused on the amount of that appropriate reserve, and the parties ultimately agreed payment of the
9 \$43,300,000 (the “Settlement Amount”) would be the maximum figure acceptable to the
10 Commission and Bureau which Defendants believed would leave an acceptable reserve for
11 operations.

12 12. The Settlement Amount was reached through arm’s-length negotiations. Though
13 professional, the negotiations have been adversarial and non-collusive in nature. Class Counsel
14 performed an extensive analysis of the proposed terms before entering into the Settlement. Class
15 Counsel recognizes the expense of proceedings necessary to continue the litigation and the
16 difficulties and delays inherent in such litigation. They also recognize the risk and uncertainty
17 inherent to further litigation and any potential outcome. Like all reasonable litigants, Class Counsel
18 evaluated the potentially available defenses alleged by Defendants, including statute of limitations
19 defenses, defenses based on the exhaustion of administrative remedies, and defenses relating to the
20 propriety of suing named defendant(s). The Settlement thus takes into account the strengths and
21 weaknesses of each side’s position and the uncertainty of how the case might have concluded
22 through certification, trial, and/or appeals, including the risks and delays to the Parties of proceeding
23 with class certification and/or representative adjudication. The Settlement also takes into account
24 the risks and expense to both Parties of further litigation and the difficulties and delays inherent in
25 such litigation. Based on the foregoing, Class Counsel believes the eight-figure Settlement Amount
26 is fair, adequate, and reasonable, and is in the best interests of the class.

27 13. This case presents significant legal and factual issues. Together with Rutan &
28 Tucker, LLP, J. Blonien, APLC is able to provide those resources, and we anticipate litigating this

1 case to finality. J. Blonien, APLC is committed to continuing its efforts on behalf of the putative
2 class until a final determination, to participating in all necessary aspects of these proceedings, to
3 efficiently advancing the litigation, and to fairly and adequately representing the proposed class's
4 interests.

5 Executed on June 9, 2025 at Sacramento, California.

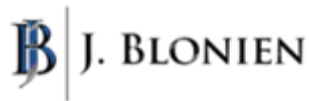
6 I declare under penalty of perjury under the laws of the State of California that the
7 foregoing is true and correct.

8
9 /s/ Jarhett Blonien

10 Jarhett Blonien

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EXHIBIT 10



A PROFESSIONAL LAW CORPORATION
1121 L STREET, SUITE 105
SACRAMENTO, CALIFORNIA 95814
916-441-4242
WWW.JBLONIEN.COM

JARHETT BLONIEN

Jarhett Blonien has deep expertise at the intersection of litigation, gambling law, and government regulation. As the founder and principal of J. Blonien, APLC, he has established a practice specializing in representing cardrooms, third-party proposition player providers, and industry stakeholders in high-stakes litigation and regulatory disputes throughout California's complex gaming landscape. This area of law is complex, highly regulated, and subject to constant change. Mr. Blonien is well known as one of the top lawyers in this niche area.

Mr. Blonien graduated from Santa Clara University School of Law in 2009. He began his career at the California Department of Justice, where he laid the foundation for his expertise in public law and regulatory enforcement. Since founding his firm in 2012, Mr. Blonien has been actively involved in shaping the future of California's licensed gambling industry in front of the Legislature, the courts, and the regulatory agencies.

His practice includes counseling clients on compliance with the Gambling Control Act, Title 4 regulations, FinCEN requirements, and state-imposed Minimum Internal Control Standards (MICS). He represents clients before State and local governments, as well as in court proceedings that include civil litigation, writ practice, Public Records Act matters, and appellate matters. He also regularly serves as an expert advisor in gaming for other attorneys representing clients in the unique gaming industry.

Mr. Blonien is actively involved in representing his clients' interests before the California Legislature and advises industry groups on the current political issues faced by gaming businesses.

Representative Matters

- Legislative advocate for California gaming issues
- Lead counsel in trial and appellate work for the gaming industry
- Lead counsel in regulatory and licensing matters, including appellate work
- Lead counsel in Public Records Act cases
- Advisor on corporate transactions involving cardrooms and Third-Party Player services

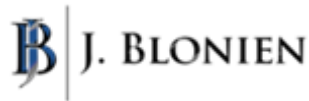
Bar Admissions

- California State Courts
- U.S. District Court, Eastern District of California
- U.S. Court of Appeals for the Ninth Circuit

Education

- Santa Clara School of Law 2009
- Santa Clara University, 2006, B.S. Political Science

EXHIBIT 11



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DANIELLE GUARD

Of Counsel

Litigation, Administrative Law, and Legislative Advocacy

dguard@jblonien.com

Danielle Guard is a seasoned litigator and legislative advocate with more than 30 years of experience representing clients before courts, administrative agencies, and the California Legislature. Her practice encompasses complex civil litigation, appellate law, regulatory law, and public policy, with a focus on healthcare, gaming, and professional licensing. She has managed high-stakes medical malpractice defense cases, overseen litigation budgets, and negotiated multimillion-dollar settlements. She is particularly skilled in motion practice, known for crafting persuasive and strategic briefings.

Ms. Guard currently serves as Of Counsel and Legislative Advocate with J. Blonien, APLC. She has played a leading role in writ practice and litigation, authored bill language, and worked closely with clients in the unique and highly regulated gaming industry. Her practice includes representing clients in licensing matters before administrative agencies, including the California Gambling Control Commission and Bureau of Gambling Control, where she has handled application support, compliance issues, and administrative hearings. In her lobbying work, Ms. Guard has helped shape legislation, combining legal insight with a practical understanding of the political landscape. Her ability to translate complex regulatory, legal, and political issues for both legal and lay audiences makes her an effective strategist in courtrooms, hearing rooms, and the Capitol.

Before her current role, Ms. Guard was a partner at two prominent Sacramento law firms, where she was trial counsel in complex medical malpractice cases. In addition to her legal work, Ms. Guard co-founded and sold a successful consumer product company, overseeing all legal and business aspects from formation to sale.

Representative Matters

- Legislative advocate for California gaming issues
- Lead counsel in medical malpractice defense litigation, including trial and appellate work
- Lead counsel in regulatory and licensing matters, including appellate work and PRA cases
- Advisor on corporate transactions involving cardrooms and Third-Party Player services
- Author of persuasive legislative position papers, bill drafts, and ballot propositions

Related Services

- Civil Litigation
- Legislative Advocacy
- Administrative and Regulatory Law

Bar Admissions

- California State Courts
- U.S. District Court, Northern and Eastern Districts of California

Education

- McGeorge School of Law, University of the Pacific (J.D., 1994)
- University of Utah (B.A., History, 1990)

1 **PROOF OF SERVICE**

2 **STATE OF CALIFORNIA, COUNTY OF ORANGE**

3 I am employed by the law office of Rutan & Tucker, LLP in the County of Orange, State
4 of California. I am over the age of 18 and not a party to the within action. My business address is
18575 Jamboree Road, 9th Flr., Irvine, CA 92612. My electronic notification address is
5 dcorwin@rutan.com.

6 On June 9, 2025, I served on the interested parties in said action the within:

7 **PLAINTIFFS' NOTICE OF MOTION AND MOTION FOR PRELIMINARY**
8 **APPROVAL OF CLASS ACTION SETTLEMENT; MEMORANDUM OF POINTS**
9 **AND AUTHORITIES**

10 **DECLARATION OF LUCAS K. HORI IN SUPPORT OF PLAINTIFFS' MOTION**
11 **FOR PRELIMINARY APPROVAL OF CLASS ACTION SETTLEMENT (Exs. 1-9)**

12 **DECLARATION OF JARHETT BLONIEN IN SUPPORT OF PLAINTIFFS'**
13 **MOTION FOR PRELIMINARY APPROVAL (Exs. 10-11)**

14 **[PROPOSED] ORDER GRANTING MOTION FOR PRELIMINARY APPROVAL**
15 **OF CLASS ACTION SETTLEMENT**

16 as stated below:

17 Daniel Robertson, Esq.
18 Michael Sapoznikow, Esq.
19 Rob Bonta, Esq.
20 Molly K. Mosley, Esq.
21 Jennifer Henderson, Esq.
22 Office of the Attorney General
23 1300 I Street, Suite 125
24 P.O. Box 944255
25 Sacramento, CA 94244-2550

26 Phone: (916) 210-7348

27 Email: Daniel.Robertson@doj.ca.gov;
28 Michael.Sapoznikow@doj.ca.gov; Rob.Bonta@doj.ca.gov;
Molly.Mosley@doj.ca.gov; Jennifer.Henderson@doj.ca.gov

29 Jarhett P. Blonien
30 Danielle M. Guard
31 J. BLONIEN, APLC
32 1121 L Street Suite 105
33 Sacramento, CA 95814-3970

VIA EMAIL ONLY

34 Phone: 916-441-4242

35 Email: jarhett@jblonien.com; dguard@jblonien.com

36 (BY MAIL) by placing a true copy thereof in sealed envelope(s) addressed as shown
37 above.

1 In the course of my employment with Rutan & Tucker, LLP, I have, through first-hand
2 personal observation, become readily familiar with Rutan & Tucker, LLP's practice of collection
3 and processing correspondence for mailing with the United States Postal Service. Under that
4 practice, I deposited such envelope(s) in an out-box for collection by other personnel of Rutan &
5 Tucker, LLP, and for ultimate posting and placement with the U.S. Postal Service on that same
6 day in the ordinary course of business. If the customary business practices of Rutan & Tucker,
7 LLP with regard to collection and processing of correspondence and mailing were followed, and I
8 am confident that they were, such envelope(s) were posted and placed in the United States mail at
9 Costa Mesa, California, that same date. I am aware that on motion of party served, service is
10 presumed invalid if postal cancellation date or postage meter date is more than one day after date
11 of deposit for mailing in affidavit.

12 (BY FEDEX) by depositing in a box or other facility regularly maintained by FedEx, an
13 express service carrier, or delivering to a courier or driver authorized by said express
14 service carrier to receive documents, a true copy of the foregoing document in sealed
15 envelopes or packages designated by the express service carrier, addressed as shown
16 above, with fees for overnight delivery provided for or paid.

17 (BY E-MAIL) by transmitting a true copy of the foregoing document(s) to the e-mail
18 addresses set forth above.

19 Executed on June 9, 2025, at Costa Mesa, California.

20 I declare under penalty of perjury under the laws of the State of California that the
21 foregoing is true and correct.

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Debbie Corwin
(Type or print name)

/s/ Debbie Corwin
(Signature)