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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
08/11/2025

By: _____ R. Lopez Deputy

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

Judge: Lauri A. Damrell

**DECLARATION OF ROMMEL MEDINA
IN SUPPORT OF PLAINTIFFS' AMENDED
MOTION FOR PRELIMINARY
APPROVAL OF CLASS ACTION
SETTLEMENT**

DATE: September 5, 2025

TIME: 9:00 a.m.

DEPT: 22

RESERVATION NO. A-80003510-001

Action Filed: 5/12/2020

Trial Date: TBD

1 **DECLARATION OF ROMMEL MEDINA**

2 I, Rommel Medina, declare as follows:

3 1. I am the Chief Executive Officer of Lucky Chances, Inc., a Plaintiff in this action. I
4 have personal knowledge of the facts set forth in this Declaration and, if called as a witness, could
5 and would testify competently to such facts under oath.

6 2. Lucky Chances, Inc., is located in Colma, California, and was founded in 1998. I
7 own Lucky Chances with my brother Ruell Medina. The business includes approximately 60 card
8 tables and employs 550 people.

9 3. Lucky Chances has served as a named plaintiff in this putative class action. I
10 understand a class action settlement (the "Settlement") has now been reached between the class
11 Plaintiffs, on the one hand, and the California Gambling Control Commission ("Commission") and
12 Bureau of Gambling Control ("Bureau"), on the other hand. The Settlement contemplates the
13 certification of a settlement class. It authorizes the named Plaintiffs to request service awards not to
14 exceed \$2,500. I further understand that class counsel will be asking this \$2,500 award on Lucky
15 Chances' behalf.

16 4. I believe this limited-service enhancement award is appropriate given Lucky
17 Chances' service in this action and participation in the litigation. That participation included,
18 without limitation, the following:

19 a. *First*, Lucky Chances agreed to be a named plaintiff and to appear on the case caption
20 to advance Plaintiffs' claims. I understood at the start of the litigation that this could expose Lucky
21 Chances to potentially disruptive discovery demands, including a request for a deposition of a
22 corporate representative and/or employees. I also understood the possibility that this could expose
23 Lucky Chances to written discovery demands, demands for production of its documents, and/or
24 increased scrutiny from the California Gambling Control Commission and/or the California
25 Department of Justice, Bureau of Gambling Control, based on the role as a litigation plaintiff.
26 Finally, I understand that had the litigation not been successful, Lucky Chances could have
27 potentially faced exposure to costs if it had not been the prevailing party.

28

1 b. **Second**, prior to filing this matter, Lucky Chances was quite concerned about the
2 amount of fees that were being charged to California Cardrooms and the growing Gambling Control
3 Fund. The Fund was growing into the millions and being used as a regular source of loans to other
4 State agencies. The fees of less than seventy California cardrooms were supporting this Fund. Our
5 fees were increasing, while the time for processing licensing applications was also growing. The
6 concern led to a request to the California Legislature to authorize an audit by the California State
7 Auditor. We sent representatives from our business to testify at the hearings and present our
8 concerns to the Legislature. We asked our governmental relations representative to push for an
9 explanation of the fees and the ever-growing Fund. When the Audit was complete, we learned that
10 the Auditor stated that the fees were so high that they appeared to be an illegal tax. This caused us
11 to pursue this action on behalf of the Cardrooms and Third-Party Proposition Player Service
12 companies paying the fees.

13 c. **Third**, after the filing of this action, Lucky Chances regularly communicated with
14 class counsel to provide input and information for the litigation. For example, Lucky Chances
15 compiled historical information on the regulatory fees it had paid to the Bureau and Commission.
16 Also, we regularly communicated with class counsel concerning industry developments, including
17 changes to the annual and regulatory fees being assessed by the Commission and the Bureau.

18 d. **Fourth**, Lucky Chances participated in the settlement process by receiving updates
19 concerning the Commission and Bureau's positions, and providing insight into the negotiation of a
20 favorable settlement to maximize the recovery for the class. Ultimately, Lucky Chances approved
21 and signed the Settlement.

22 e. Overall, I estimate Lucky Chances spent in excess of 100 hours on this issue and at
23 least 75 of those were directly related to this litigation. Lucky Chances employees and
24 representatives have other business demands, and service to the class took time from other activities.
25 I correspondingly believe a limited award of \$2,500 appropriately compensates Lucky Chances for
26 this service.

27 5. I further understand the law firms Rutan & Tucker, LLP and J. Blonien, APLC have
28 been representing Lucky Chances in this case, and also seek to represent a settlement class of

1 similarly situated cardrooms and proposition player providers. Based on my experience, I believe
2 that those firms have worked diligently to protect the interests of Lucky Chances and the class in
3 this dispute. I believe that they will do so until this case reaches a final determination.

4 I declare under penalty of perjury under the laws of the State of California that the foregoing
5 is true and accurate.

6 Executed on August 5, 2025 at Colma, California.

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8 Rommel Medina
Rommel Medina

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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 August 11, 2025, I served on the interested parties in said action the within:

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

10 **DECLARATION OF LUCAS K. HORI IN SUPPORT OF PLAINTIFFS'**
11 **AMENDED MOTION FOR PRELIMINARY APPROVAL OF CLASS ACTION**
12 **SETTLEMENT**

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

15 **DECLARATION OF MICHAEL MALAKOUTI IN SUPPORT OF PLAINTIFFS'**
16 **AMENDED MOTION FOR PRELIMINARY APPROVAL**

17 **DECLARATION OF ROMMEL MEDINA IN SUPPORT OF PLAINTIFFS'**
18 **AMENDED MOTION FOR PRELIMINARY APPROVAL OF CLASS ACTION**
19 **SETTLEMENT**

20 **DECLARATION OF TRICIA CASTELLANOS IN SUPPORT OF PLAINTIFFS'**
21 **AMENDED MOTION FOR PRELIMINARY APPROVAL OF CLASS ACTION**
22 **SETTLEMENT**

23 **DECLARATION OF CAMERON AZARI IN SUPPORT OF PLAINTIFFS'**
24 **AMENDED MOTION FOR PRELIMINARY APPROVAL**

25 **[PROPOSED] ORDER GRANTING AMENDED MOTION FOR PRELIMINARY**
26 **APPROVAL OF CLASS ACTION SETTLEMENT**

27 as stated below:

28 Daniel Robertson, Esq.
Michael Sapoznikow, Esq.
Rob Bonta, Esq.
Jennifer Henderson, Esq.
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1 Email: Daniel.Robertson@doj.ca.gov;
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11 (BY MAIL) by placing a true copy thereof in sealed envelope(s) addressed as shown
12 above.

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

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

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

Executed on August 11, 2025, at Costa Mesa, California.

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

Debbie Corwin
(Type or print name)

/s/ Debbie Corwin
(Signature)