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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 TRICIA  
CASTELLANOS 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           b.       **Second**, prior to filing this matter, Fortune Players 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 and twenty-five Third Party  
5 Proposition Player companies were supporting the Fund. Our fees were increasing, while the time  
6 for processing licensing applications was also growing. The concern led to a request to the California  
7 Legislature to authorize an audit by the California State Auditor. I went to the State Capitol and  
8 brought other concerned employees and community members to testify at the hearings and present  
9 our concerns to the Legislature. We asked our governmental relations representative to push for an  
10 explanation of the fees and the ever-growing Fund. When the Audit was complete, we learned that  
11 the Auditor stated that the fees were so high that they appeared to be an illegal tax. This caused us  
12 to pursue this action on behalf of the Cardrooms and Third-Party Proposition Player Service  
13 companies paying the fees.

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

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

23           e.       Overall, I estimate Fortune Players spent in excess of 125 hours on this issue, and at  
24 least 70 of those were directly related to this litigation. Fortune Players employees and  
25 representatives have other business demands, and service to the class took time from other activities.  
26 I correspondingly believe a limited award of \$2,500 appropriately compensates Fortune Players for  
27 this service.

28           5.       I further understand the law firms Rutan & Tucker, LLP and J. Blonien, APLC have

1 been representing Fortune Players in this case, and also seek to represent a settlement class of  
2 similarly situated cardrooms and proposition player providers. Based on my experience, I believe  
3 that those firms have worked diligently to protect the interests of Fortune Players and the class in  
4 this dispute. I also think that they will do so until this case reaches a final determination.

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

7 Executed on August 5th, 2025 at Daly City, California.

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Tricia Castellanos

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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, 9<sup>th</sup> 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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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)