



BIG LAGOON RANCHERIA

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August 25, 2025

Chair Caballero and Committee Members
Senate Appropriations Committee
State Capitol
Sacramento, CA 95814

RE: Opposition to AB 831 (as amended through August 2025)

Dear Chair Caballero and Members of the Senate Appropriations Committee (the Committee):

On behalf of Big Lagoon Rancheria, I write to respectfully request that the Committee and the Legislature pause consideration of AB 831 to allow additional time for meaningful tribal consultation and consideration of this critical issue.

Because AB 831 threatens tribal sovereignty and self-determination, it does not have the unanimous support of California's Indian tribes.

1. Lack of Sufficient Consultation and Transparency

AB 831 began as a straightforward amendment to tribal-state compact law involving a minor tweak to the Governor's compact review period. The Assembly has only considered the original version of the bill that adjusted the compact review period.

However, once it arrived in the Senate two months ago, the bill was gutted, amended, and completely restated into its present form, transforming it from a technical compact-related measure into a broad and blanket prohibition of various types of online gaming.

AB 831 was advanced in the Senate without the meaningful, government-to-government consultation that is owed to all California tribes under both federal and state policy commitments. This approach undermines California's stated commitments to tribal consultation and erodes trust between California and its tribal governments.

2. Encroachment on Tribal Sovereignty

Of particular concern is the broad criminalization language in AB 831. AB 831 not only criminalizes the operators of online gaming platforms. It also provides criminal penalties for those who "directly or indirectly" facilitate, promote, or otherwise support such platforms, such as payment processors, geolocation services, advertising firms,

software developers, and call centers. As written, AB 831's sweeping prohibition also applies to Indian tribes.

This attempt to extend State criminal jurisdiction into Indian Country violates federal law. Such overreach undermines the federal and California policies of promoting tribal sovereignty and self-determination.

3. Economic Harm to Certain Tribes

AB 831 will eliminate business opportunities for various tribes by locking them out of emerging digital business sectors, without offering any offsetting benefits. This will impact tribes that do not have the geographic benefit of being able to operate large gaming casinos.

4. Fiscal Impacts Uncertain

The Committee and the Legislature have a duty to review the fiscal impact of bills before they move forward in the legislative process. However, because AB 831 was gutted and amended so recently, there has not been sufficient time to study the fiscal impacts of AB 831 on California and its Indian tribes.

The Committee and the Legislature should not advance the bill without a more thorough analysis of the financial costs, benefits, and budgetary tradeoffs of AB 831 and its possible alternatives. More economic analysis and input from experts are necessary.

5. Alternatives

There are many alternative solutions to the blanket prohibition embodied in AB 831 that could better serve the State, Indian tribes, and consumers. However, these alternatives have not been explored in any detailed or comprehensive way.

Conclusion

For these reasons, the Tribe urges the Committee and the Legislature not to advance AB 831 until there has been sufficient time for there to be meaningful, government-to-government consultation with all of California's Indian tribes so that fair alternatives can be explored that both protect consumers and uphold tribal sovereignty.

Respectfully,

A handwritten signature in black ink, appearing to read "Virgil Moorehead", written in a cursive style.

Virgil Moorehead
Tribal Chairperson
Big Lagoon Rancheria