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BEFORE THE
CALIFORNIA GAMBLING CONTROL COMMISSION

In the Matter of the Application for Third-Party
Proposition Player Services License for
Supervisor, Player or Other Employee for:

DIANNE NGA TRAN

Registration No. TPPL-016256

Respondent.

CGCC Case No. CGCC-2017-1218-17A
BGC Case No. BGC-HQ2018-00002SL

DECISION AND ORDER

Hearing Date: May 3, 2018

Time: 2:00 p.m.

This matter was heard by the California Gambling Control Commission (Commission) pursuant to Business and Professions Code sections 19870 and 19871 and Title 4, California Code of Regulations (CCR) section 12060(b), in Sacramento, California, on April 27, 2018.

Ronald Diedrich, Deputy Attorney General, State of California, represented complainant Stephanie Shimazu, Director of the Bureau of Gambling Control (Bureau), Department of Justice, State of California (Complainant).

Dianne Nga Tran (Applicant) was present at the hearing on her own behalf without representation.

During the administrative hearing, Presiding Officer Russell Johnson took official notice of the following:

- 1) Notice of Hearing dated February 8, 2018 with attachments;
 - a. Applicant's Application for Third-Party Proposition Player Services License for Supervisor, Player or Other Employee Application received January 25, 2016; and
 - b. Bureau Report dated November 2, 2017.
- 2) Statement of Reasons filed on February 25, 2018 and served by the Complainant;
- 3) Notice of Defense signed by Applicant on December 26, 2017; and
- 4) Conclusion of Prehearing Conference letter dated March 20, 2018.

During the administrative hearing, Presiding Officer Russell Johnson accepted into

1 evidence the following exhibits offered by the Complainant as identified in their table of contents:

- 2 1) Statement of Reasons; Statement to Respondent; copies of Bus. & Prof. Code, §§
3 19870 & 19871; copy of Cal. Code. Regs., tit. 4, § 12060; February 14, 2018,
4 Declaration of Service by Certified Mail Service, with signed Returned Receipt;
5 and Notice of Defense, dated December 26, 2017., Bates Nos. 001 – 024;
- 6 2) California Gambling Control Commission Notices and Letters:
 - 7 a. December 20, 2017, Referral of Third-Party Proposition Player Services
8 License to an Evidentiary Hearing for Dianne Tran., Bates Nos. 025 – 026,
 - 9 b. February 8, 2018, Notice of Hearing and Prehearing Conference, with
10 attachments and proof of service, Bates Nos. 027 – 047,
 - 11 c. March 20, 2018, Conclusion of Pre-hearing Conference, Bates Nos. 048 – 055.
- 12 3) Redacted copies of Dianne Tran's Application for Third-Party Player Services
13 License for Supervisor, Player or Other Employee and Level 1 Supplemental
14 Information (collectively, Application), Bates Nos. 056 – 081;
- 15 4) A redacted copy of the Bureau's November 2, 2017, Third-Party Player
16 Background Investigation Report regarding Dianne Nga Tran, Bates Nos. 082 –
17 096;
- 18 5) November 13, 2017, California Gambling Control Commission, Licensing
19 Division Memorandum, re Dianne Tran, Player - Acme Player Service, LLC,
20 Bates Nos. 097 – 099;
- 21 6) Department of Justice, Criminal History Report, Bates Nos. 100 – 102;
- 22 7) Redacted copy of the Westminster Police Department's report re June 12, 1999,
23 arrest of Dianne Tran, Bates Nos. 103 - 106;
- 24 8) Orange County Superior Court's Record Search Results and Certification, Bates
25 Nos. 107;
- 26 9) Copies of Bureau communication with Dianne Tran:
 - 27 a. October 6, 2016, letter to Hein Papaian, designated agent, Acme Player
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- Services, LLC, from the Bureau requesting additional information and documentation from Dianne Tran, Bates Nos. 108 – 109,
- b. November 15, 2016, email from Kimberley Viray, designated agent and Human Resources Director for Acme Player Services, LLC, in response to November 14, 2016, email from Bureau Associate Analyst Annelise Barret, requesting a reply to the October 6, 2016, letter to Hein Papaian, Bates Nos. 110 – 111,
 - c. Attached to November 15, 2016, email from Kimberley Viray, the hand written reply by Dianne Trans to the Bureau's October 6, 2016, wherein she explains her employment and criminal histories, Bats Nos. 112 – 114,
 - d. January 27, 2017, email correspondence between Kimberly Viray and Bureau Analyst Katie Raderchak regarding the request for additional information regarding Dianne Trans' explanation regarding her 1999 conviction, Bates Nos. 115 – 116,
 - e. January 30, 2017, Bureau of Gambling Control Contact Sheet regarding a phone conversation between Katie Raderchak and Dianne Tran, Bates Nos. 117,
 - f. January 30, 2017, email from Dianne Tan to Katie Raderchak regarding the circumstances giving rise to her 1997 conviction, Bates Nos. 118.

FINDINGS OF FACT

1. On or about March 14, 1997, Respondent was convicted of violating Penal Code section 487, subdivision (a), grand theft, a misdemeanor and a crime of dishonesty or moral turpitude, in the case of *People v. Dianne Nga Tran* (Super. Ct. Orange County, 1997, Case 97HM01822).
2. On or about July 7, 1997, Respondent was convicted of violating Penal Code sections 148.9, providing false identification to a police officer, and 529.3, false impersonation, both misdemeanors and crimes of dishonesty or moral turpitude, in the case of *People v. Dianne Nga Tran* (Super. Ct. Orange County, 1997, Case 97HM04795).

1 3. On or about July 2, 1999, Applicant was convicted of violating Penal Code section
2 484(a), theft of personal property, petty theft, a misdemeanor and a crime of dishonesty and moral
3 turpitude, in the case of *People v. Dianne Nga Tran* (Super. Ct. Orange County, 1999, Case
4 99WM07218).

5 4. On or about September 7, 2007, Applicant obtained relief from all four convictions
6 pursuant to Penal Code section 1203.4.

7 5. On or about December 8, 2015, the Commission issued Applicant a third-party
8 proposition player services registration, number TPPL-019209. A new registration was provided
9 in or around December 2017, with an expiration date of December 31, 2019.

10 6. On or about January 25, 2016, the Bureau received a Third-Party Proposition Player
11 Services License for Supervisor, Player or Other Employee Application from Applicant, as well
12 as a Level 1 Supplemental Information form (collectively herein "Application") to convert her
13 registration as a third-party proposition player to a license.

14 7. On Applicant's application, Bates No. 070, Section 4, Criminal History Information,
15 Question (2), Applicant was asked:

16 Have you been convicted of a misdemeanor within the last 10 years? (Convictions
17 dismissed under Penal Code section 1203.4 must be disclosed, unless an order sealing
18 records under Penal Code section 1203.45 relating to persons under 18 years of age,
has been issued.)

19 8. In response, Applicant marked the box "No."

20 9. On Applicant's application, Section 4, Criminal History Information, Question (4),
21 Applicant was asked, "Have you ever engaged in any act involving dishonesty or moral turpitude
22 charged or chargeable as a criminal offense?" In response, Applicant marked the box "No."

23 10. On Applicant's application, Section 4, Criminal History Information, Question (5),
24 Applicant was asked, "Have you **ever** been convicted of an offense involving dishonesty or moral
25 turpitude?" In response, Applicant marked the box "No."

26 11. On Applicant's application, Applicant did not disclose any of her four convictions.

27 12. The Application was signed by Applicant under penalty of perjury on October 28,
28 2015.

1 13. After receiving the application, on October 6, 2016, the Bureau sent Applicant a letter
2 stating:

3 Criminal History: Information available to the Bureau shows that Ms. Tran has the
4 following convictions from the Orange County Superior Court. Provide a detailed
5 signed and dated statement from Ms. Tran explaining the circumstances that led to
6 each conviction, including the reason she answered "no" to the question, "Have you
7 ever engaged in any act involving dishonesty or moral turpitude charged or
8 chargeable as a criminal offense?"

- 9 a. On March 31, 1997, Ms. Tran was convicted of violating Penal Code (PC)
10 section 487(a), grand theft, a misdemeanor. ·
- 11 b. On July 11, 1997, Ms. Tran was convicted of violating PC section 529.3,
12 impersonation to make another liable, a misdemeanor, and PC section 148.9,
13 providing false identification to a peace officer, a misdemeanor.
- 14 c. On July 12, 1999, Ms. Tran was convicted of violating PC section
15 484(a)/488, theft of personal property/petty theft, a misdemeanor.

16 14. Applicant provided a handwritten statement in response on October 10, 2016. In
17 regards to the March 31, 1997 grand theft conviction, application stated:

18 I got charge for the grand theft because I hung out with a group of my friends in the
19 mall. One of my friends in the group stole clothes from a store putting inside the bag
20 which I did not notice that until I got caught from a security @ the store when I was
21 holding the bag for my friend using the restroom. I thought he already paid for those
22 clothes, but he just purchased only a few and the rest the other clothes he stole and
23 put them together with those he already paid for. I tried to explain to the security guy,
24 but he didn't believe me since he saw me holding the bag with no receipts.

25 15. Application also explained the July 12, 1999 conviction for petty theft:

26 On 7/1999 I got charge for a petty theft because I took my nephew to the toy store to
27 get him a birthday gift. At the store, he picked out a toy that I didn't want him to
28 have, so I asked him to put it back, and then I bought him a different toy which I
believed it more appropriate for his age. After paid for the toy, I walked out the door
and certain I heard the alarm by the door peeing, so the security stopped me and
checked inside my bag. OMG.... I didn't know my nephew put the toy that he liked
to have it inside the bag, so I got caught again.

16. Lastly, in explaining why she marked "No" and not "Yes" in listing the misdemeanor
convictions, Applicant stated:

* The reason my application did not mark "Yes" @ the place indicating criminal
charges because I asked one of the staff personnel about this and he told me that if my
charges were not felony, do not mark "Yes". I even checked with the court to make
sure I was charged with misdemeanor not felony, so I marked "No".

17. Subsequently, Katie Raderchak with the Bureau spoke with Applicant on January 30,

1 2017 over the phone inquiring about the 1999 petty theft conviction. Ms. Raderchak indicated
2 that the Applicant's statement that the conviction was for the theft of a toy was inconsistent with
3 the police report which indicated it was for the theft of a wallet. Applicant provided an email
4 response the same day which stated:

5 Per our conversation over the phone this morning, I am writing this statement to you
6 regarding about the conviction in 1997. At that time, my nephew took the toy putting
7 inside my shopping bag without my knowledge, so I admitted and too responsibility
8 for that because my fault I didn't keep my eyes on him when he did it. However, the
9 wallet you told me about that wasn't mine and my friend took it also putting inside
10 my bag without telling me. So when I walked through the security gate, the alarm
11 sounded out, and then the security pulled me and my friend and my nephew back
12 inside. They found the toy and the wallet inside my bag and they blamed both were
13 mine.

14 18. In that same statement, Applicant explained the July 11, 1997 conviction for
15 impersonation to make another liable, and providing false identification to a peace officer as
16 follows:

17 On that day, the security sent me to the police department. I was scared that my dad
18 might know about this, so I lied to the officer about my name by using my cousin's
19 name to get away from trouble. On 7/1997, the officer found out about this, so he
20 caught me back and charged me for giving out fault information.

21 19. On or about October 6, 2017, the Bureau issued a Third-Party Player Background
22 Investigation Report, recommending Applicant's Application be denied.

23 20. On December 18, 2017, pursuant to CCR section 12054(a)(2), the Commission
24 referred consideration of Applicant's Application to an evidentiary hearing to be held under the
25 provisions of CCR section 12060(b).

26 21. On or about December 26, 2017, Applicant signed and sent a notice of defense to the
27 Commission requesting an evidentiary hearing.

28 22. On or about February 12, 2018, the Bureau, as Complainant, filed a statement of
reasons with the Commission recommending the denial of Applicant's Application and the
cancellation of her registration as a third-party proposition player.

23. The Commission heard Case No. CGCC-2017-1218-17A on Thursday, May 3, 2018.
The Complainant was represented throughout the pendency of the hearing by Deputy Attorney

1 General Ron Diedrich. Applicant was present on her own behalf without representation.

2 24. Applicant testified under oath about the four misdemeanor convictions. In regards to
3 the March 31, 1997 conviction for grand theft, she testified that she had gone shopping with her
4 friends and they had given her their items before they went to the restroom. She thought they had
5 paid for them. When she was leaving the store, the store employees stopped her and took her back
6 to where her friends were. She said she showed her bag with her receipt to the store employees
7 and then asked her friends to show theirs, but they did not have one. She said she got scared and
8 took the blame and regretted it. She indicated she plead guilty to the conviction because it was in
9 the middle of finals and that if she plead not guilty the matter would continue on. She has no idea
10 if her friends suffered a conviction.

11 25. In regards to the July 7, 1997 convictions for impersonation to make another liable and
12 false identification to a police officer, Applicant indicated that this was related to the theft
13 conviction from March 1997. She stated at that time she was scared her father would find out so
14 she used a cousin's name when she talked to the police. She had no identification at the time.
15 Applicant's testimony was unclear as to why she had two misdemeanor convictions and not one
16 as she thought there was only one. However, the court documentation clearly reflects two
17 convictions.

18 26. Lastly, in regards to the July 2, 1999 conviction for petty theft, Applicant testified that
19 it was in regards to a toy being taken from the store due to her nephew placing it in her bag.
20 When she was asked about the discrepancy between the police report which did not list a toy at
21 all and only listed a stolen wallet, Applicant inexplicably focused on the fact that she admitted
22 taking responsibility for taking the toy gun by her nephew to the police, but not the wallet.
23 Additionally she argued strenuously that the report was wrong as it was not a wallet, but was in
24 fact a clutch. She indicated that she didn't take the clutch and was only signing for the toy gun as
25 it was late and she was in a hurry. Unfortunately, the record did not clearly establish what
26 Applicant was signing as there were no documents related to this incident that contained her
27 signature, or included a reference to the toy gun.

1 27. Applicant’s testimony in regards to this conviction is inconsistent with the police
2 report in two key ways. First, as to the timing, the police report indicated that this theft occurred
3 in the early afternoon at between 1:15 p.m. to 2:10 p.m. and that she was only arrested at 3:33
4 p.m. by the Westminster Police Department. Yet, the report also indicates that she was cited and
5 released rather than booked. Applicant was confronted on her statement that it was late when she
6 left the store and she indicated she knew it was late because it was dark. However, on July 2,
7 1999, sunset occurred at 8:07 p.m. in Westminster, California; much later than 3:33 p.m.¹

8 28. Second, and more importantly, the police report makes no mention of her friend,
9 provides any indication that a friend put a wallet or clutch in Applicant’s bag, and does not say
10 anything about a toy gun or the involvement of Applicant’s nephew.

11 29. In regards to her Application, Applicant admitted that she knew she had convictions
12 for acts of dishonesty. However, she stated she did not fill the application out herself, but had the
13 assistance of an employee from her employer named Steve Duran. When she was filling out the
14 Application and came to these questions related to her convictions she indicated she asked him
15 what she should do. She stated, Mr. Duran indicated that she needed to find out if it was a felony.
16 If it was a felony there was nothing he could do, but if it was a misdemeanor he said she didn’t
17 need to put it on the application. Applicant stated she hired a lawyer to look into the charges who
18 said over the phone that they were not felonies. Applicant then answered the Application
19 questions as indicated above.

20 30. When asked as to the specific language of the question and the lack of the word
21 “felony” and that it merely wanted any “acts,” Applicant’s testimony reiterated her alleged
22 interaction with Mr. Duran who purportedly stated that if it was a felony, the Commission would
23 deny right away but that that if it was a misdemeanor it was okay. If was a felony, he would not
24 even turn her application in.

25 31. Applicant stated she takes responsibility for the convictions for false identification to a
26 police and impersonating another to make them liable. In contrast, Applicant testified that she

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28 ¹ The Commission takes official notice of this fact.

1 does not take responsibility for the two theft convictions as she believes they were the result of
2 her friends and possibly her nephew, but not her.

3 32. Applicant's lack of taking responsibility appears to establish a troubling pattern of
4 behavior. In each criminal conviction, Applicant attempted to shift the blame from herself to
5 others. In regards to the first theft, Applicant blamed her friends for shoplifting despite pleading
6 guilty to the crime. When she was confronted by police in regards to this theft, she attempted to
7 avoid responsibility by trying to shift blame to her cousin. When she was convicted with theft
8 again two years later, she tried to blame her nephew. When she was confronted with the lack of
9 support for that story in the application process and at the hearing, she tried to argue about what
10 was actually stolen; i.e. clutch versus wallet. Lastly, despite filling out the Application herself,
11 stating she understood the questions, and signing as to the truth of her answers under a penalty of
12 perjury, she again attempted to divert responsibility for her untrue responses by blaming someone
13 else for bad instructions.

14 33. Applicant's testimony in regards to her improper filling out the application is not
15 believable. Applicant was specifically asked to answer two questions focused on whether she ever
16 engaged in any act or was convicted of any offense involving dishonesty or moral turpitude.
17 Applicant answered "No" when she should have put "Yes" to both of these based, allegedly, on
18 the direction of Mr. Duran. Yet, nothing in these questions predicates an answer on the distinction
19 between a felony and a misdemeanor or provides that misdemeanor acts or offenses need not be
20 disclosed. Rather, the questions seek a broad category of information material to the background
21 investigation process. While Applicant tried to focus responsibility for the Application on Mr.
22 Duran, this appears to be at best an attempt to avoid taking responsibility for her improper
23 completion of the form, or worst an attempt to obfuscate her dishonesty.

24 34. The matter was submitted for Commission consideration on May 3, 2018.

25 LEGAL CONCLUSIONS

26 1. Division 1.5 of the Business and Professions Code, the provisions of which govern the
27 denial of licenses on various grounds, does not apply to licensure decisions made by the
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1 Commission under the Gambling Control Act. Business and Professions Code section 476(a).

2 2. At an evidentiary hearing pursuant to Business and Professions Code sections 19870
3 and 19871 and Title 4, CCR section 12060(b), the burden of proof rests with the applicant to
4 prove his qualifications to receive any license under the Gambling Control Act. Title 4, CCR
5 section 12060(i); Business and Professions Code section 19856(a).

6 3. Public trust and confidence can only be maintained by strict and comprehensive
7 regulation of all persons, locations, practices, associations, and activities related to the operation
8 of lawful gambling establishments and the manufacture and distribution of permissible gambling
9 equipment. Business and Professions Code section 19801(h).

10 4. An application to receive a license constitutes a request for a determination of the
11 applicant's general character, integrity, and ability to participate in, engage in, or be associated
12 with, controlled gambling. Business and Professions Code section 19856(b).

13 5. The Commission has the responsibility of assuring that licenses, approvals, and
14 permits are not issued to, or held by, unqualified or disqualified persons, or by persons whose
15 operations are conducted in a manner that is inimical to the public health, safety, or welfare.
16 Business and Professions Code section 19823(a)(1).

17 6. An "unqualified person" means a person who is found to be unqualified pursuant to
18 the criteria set forth in Business and Professions Code section 19857, and "disqualified person"
19 means a person who is found to be disqualified pursuant to the criteria set forth in Business and
20 Professions Code section 19859. Business and Professions Code section 19823(b).

21 7. The Commission has the power to deny any application for a license, permit, or
22 approval for any cause deemed reasonable by the Commission. Business and Professions Code
23 section 19824(b).

24 8. No gambling license shall be issued unless, based on all of the information and
25 documents submitted, the commission is satisfied that the applicant is a person of good character,
26 honesty and integrity. Business and Professions Code section 19857(a).

27 9. The commission shall deny a license to any applicant who is disqualified for failure of
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1 the applicant to provide information, documentation, and assurances required by this chapter or
2 requested by the chief, or failure of the applicant to reveal any fact material to qualification, or the
3 supplying of information that is untrue or misleading as to a material fact pertaining to the
4 qualification criteria. Business and Professions Code section 19859(b).

5 10. A registrant requesting a license shall be ineligible for licensing if the requestor has
6 failed to meet the requirements of Business and Professions Code sections 19856 or 19857. Title
7 4, CCR section 12218.11(e).

8 11. A registrant requesting a license shall be ineligible for licensing if the requestor would
9 be ineligible for a state gambling license under any of the criteria set forth in Business and
10 Professions Code section 19859, subdivisions (b), (e), or (f). Title 4, CCR section 12218.11(f).

11 12. Any regular registration issued in accordance with Chapter 2.1 of Division 18 of Title
12 4 of the California Code of Regulations shall be subject to cancellation if the Commission
13 determines after a noticed hearing that the registrant is ineligible for registration, has failed in the
14 application for registration to reveal any fact material to the holder's qualification for registration,
15 or has supplied information in the registration application that is untrue or misleading as to a
16 material fact pertaining to the criteria for issuance of registration. Title 4, CCR section 12205(a).

17 13. An applicant is ineligible for registration if the applicant would be ineligible for a
18 state gambling license under any of the criteria set forth in Business and Professions Code section
19 19859, subdivisions (b), (e), or (f). Title 4, CCR section 12204(e).

20 14. Applicant provided untrue answers on her application regarding material facts related
21 to her qualifications. In addition, applicant provided untrue or misleading responses as to
22 material facts in response to Bureau inquiries about her convictions. Therefore, Applicant is
23 disqualified for licensure pursuant to Business and Professions Code section 19859(b) and
24 ineligible for licensing as a third-party provider of proposition player services pursuant to Title 4,
25 CCR section 12218.11(f).

26 15. Additionally, applicant's testimony at the hearing regarding the events was not
27 persuasive and reflected intent to obfuscate the truth of her past behavior and divert responsibility
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1 to others. This along with her past behavior and criminal convictions reflects poorly on her
2 character, honesty and integrity. Additionally, despite pleading guilty to multiple convictions,
3 Applicant still does accept responsibility for all her past actions which poses a threat to the public
4 interest of the state, as well as the security of controlled gambling. Therefore, Applicant is
5 unsuitable for licensure pursuant to Business and Professions Code section 19857(a) & (b) and
6 ineligible for licensing as a third-party provider of proposition player services pursuant to Title 4,
7 CCR section 12218.11(e).

8 16. Given that Applicant is ineligible for registration pursuant to Title 4, CCR sections
9 12204, subdivisions (e) and (i), her regular registration is subject to cancellation pursuant to Title
10 4, CCR section 12205(a).

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NOTICE OF APPLICANT’S APPEAL RIGHTS

Applicant has the following appeal rights available under state law:

Title 4, CCR section 12064, subsections (a) and (b) provide, in part:

An applicant denied a license, permit, registration, or finding of suitability, or whose license, permit, registration, or finding of suitability has had conditions, restrictions, or limitations imposed upon it, may request reconsideration by the Commission within 30 calendar days of service of the decision, or before the effective date specified in the decision, whichever is later. The request shall be made in writing to the Commission, copied to the Bureau, and shall state the reasons for the request, which must be based upon either newly discovered evidence or legal authorities that could not reasonably have been presented before the Commission’s issuance of the decision or at the hearing on the matter, or upon other good cause which the Commission may decide, in its sole discretion, merits reconsideration.

Business and Professions Code section 19870, subdivision (e) provides:

A decision of the commission denying a license or approval, or imposing any condition or restriction on the grant of a license or approval may be reviewed by petition pursuant to Section 1085 of the Code of Civil Procedure. Section 1094.5 of the Code of Civil Procedure shall not apply to any judicial proceeding described in the foregoing sentence, and the court may grant the petition only if the court finds that the action of the commission was arbitrary and capricious, or that the action exceeded the commission’s jurisdiction.

Title 4, CCR section 12066, subsection (c) provides:

A decision of the Commission denying an application or imposing conditions on license shall be subject to judicial review as provided in Business and Professions Code section 19870, subdivision (e). Neither the right to petition for judicial review nor the time for filing the petition shall be affected by failure to seek reconsideration.

ORDER

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2 1. Dianne Nga Train's Application for a Third-Party Proposition Player Services
3 License for Supervisor, Player or Other Employee is DENIED.

4 2. Dianne Nga Train's regular registration as a third-party proposition player,
5 Registration Numbers TPPL-016256 is CANCELLED.

6 3. No costs are to be awarded.

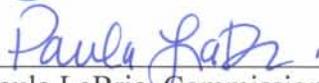
7 4. Each side to pay its own attorneys' fees.

8 This Order is effective on June 22, 2018.

9 Dated: 5/23/18

Signature: 
Jim Evans, Chairman

11 Dated: 5/23/18

Signature: 
Paula LaBrie, Commissioner

14 Dated: 5/23/18

Signature: 
Trang To, Commissioner