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BEFORE THE
CALIFORNIA GAMBLING CONTROL COMMISSION

In the Matter of the Application for Work Permit for:

DORA CHRISTINA BROWN

Applicant.

CGCC Case No. CGCC-2023-0504-5
BGC Case No. BGC-HQ2023-00005SL

DECISION AND ORDER

Hearing Dates: December 12, 14, 2023
Time: 10:00 a.m.

This matter was heard by the California Gambling Control Commission (Commission)¹ pursuant to Business and Professions Code sections² 19870 and 19871 and Title 4, California Code of Regulations (CCR) section 12060, in Sacramento, California, and held via Zoom video conference, on December 12 and 14, 2023.³

James Waian, Deputy Attorney General, State of California (DAG Waian), represented complainant Yolanda Morrow, Director of the Bureau of Gambling Control (Bureau), Department of Justice, State of California.

Applicant Dora Brown (Brown) appeared on her own behalf and was represented by attorney Tiffany Lichtig.

During the evidentiary hearing, Presiding Officer Russell Johnson (Presiding Officer) took official notice of the following documents: the Commission’s Notice and Agenda of Commission Hearing, the Commission’s Conclusion of Prehearing Conference Letter and Rulings on Prehearing Motions, the Commission’s Notice of Hearing with two attachments: (a) Brown’s Application for Work Permit and (b) the Bureau’s Work Permit Background Investigation Report, with attachments; the Bureau’s Statement of Reasons, and Brown’s signed Notice of Defense.

¹ Commissioner Galgiani was present during the hearing and in deliberations, but resigned her position effective January 15, 2024, before the decision was finalized.

² All references to statute refer to the California Business and Professions Code unless otherwise stated.

³ The hearing was noticed for December 12, 14, and 15, 2023. However, the hearing was completed and the administrative record closed on December 12, 2023. The Commission met in open session briefly on December 14, 2023, and entered closed session for deliberations. The December 15, 2023, hearing date was cancelled.

1 Pursuant to a stipulation between the parties, the Presiding Officer accepted into evidence
2 Exhibits 1 through 16 offered by the Bureau, which contain bates numbering BGC 001 through
3 BGC 680 with a Table of Contents that separately identifies each document.

4 Pursuant to a stipulation between the parties, the Presiding Officer accepted into evidence
5 Exhibits A through H offered by Brown, which contain bates numbering DCB 001 through DCB
6 082 with a Table of Contents that separately identifies each document.

7 On December 12, 2023, the Presiding Officer closed the administrative record and the
8 matter was submitted to the Commission for consideration.

9 **FINDINGS OF FACT**

10 **I. PROCEDURAL HISTORY**

11 *Renewal of Owner License*

12 1. From July 1995 to June 2021, Brown was the sole owner of Outlaws Card Parlour
13 (Outlaws) in Atascadero, California under license number GEOW-002950. In June 2020, Brown,
14 as a sole proprietor, filed an application with the Bureau to renew the State Gambling License
15 issued to her and Outlaws (Renewal Owner License Application).

16 2. On or about May 3, 2017, the Bureau received an application for State Gambling
17 License from Outlaws 101, LLC as the prospective owner licensee of Outlaws. On or about April
18 19, 2017, Thomas Bartlett and John Wrona each submitted an Application for State Gambling
19 License as members of Outlaws 101, LLC (New Owner Applications).

20 3. On October 12, 2018, the Bureau received an Asset Purchase and Sale Agreement
21 between Brown and Outlaws 101, LLC for Brown to sell her interest in the cardroom.

22 4. On May 8, 2019, the Bureau served a Letter of Warning (May 2019 LOW) on Outlaws
23 alleging violations of the Gambling Control Act (Act), California Penal Code, Commission
24 regulations, and Atascadero Municipal Code for failing to ensure cardroom dealers rotated the
25 player-dealer position⁴ and prominently displayed work permits (“badges”).

26 ⁴ Section 19805, subdivision (ag) defines the player-dealer as “a position in a controlled game, as
27 defined by the approved rules for that game, in which seated player participants are afforded the temporary
28 opportunity to wager against multiple players at the same table, provided that this position is rotated
amongst the other seated players in the game.” California Penal Code section 330.11 provides in part that a

1 5. On June 17, 2019, the Bureau served a Letter of Warning (June 2019 LOW) on
2 Outlaws alleging multiple violations of the Act and the Atascadero Municipal Code for violations
3 of internal Minimum Internal Control Standards (MICS),⁵ unlicensed persons performing owner
4 or key employee duties, minors on the gaming floor, and failing to continuously and
5 systematically rotate the player-dealer position and prominently display badges.

6 6. Brown submitted a Corrective Action Plan (CAP) in response to the May 2019 LOW
7 and June 2019 LOW. The Bureau in turn sent Letters of Acknowledgment to Brown on June 10,
8 2019, and July 11, 2019, acknowledging receipt of the CAPs. The Letters of Acknowledgement
9 warned that the Commission may take the violations into consideration when determining
10 whether to deny, approve or impose conditions on a license and that continued violations may
11 result in disciplinary action against Outlaws.

12 7. On June 19, 2020, the Bureau filed an accusation against Brown as the sole proprietor
13 of Outlaws. The pleading included similar allegations to those in the May 2019 LOW and June
14 2019 LOW.

15 8. On September 24, 2020, the Commission considered approval of the sale transaction
16 and the New Owner Applications. The Commission took no action on the sale transaction and
17 referred the New Owner Applications to a hearing.

18 9. On October 30, 2020, the Bureau submitted a Gambling Establishment and Owner
19 Renewal Report to the Commission recommending that the Commission deny Brown's Renewal
20 Owner License Application.

21 10. On January 7, 2021, the Commission referred consideration of Brown's Renewal
22 Owner License Application to an evidentiary hearing to be conducted under the Administrative
23 Procedure Act (APA) and be consolidated with the accusation. An interim renewal license was
24 issued to Brown valid through July 31, 2022.

25 11. On May 20, 2021, the Commission issued a decision after conclusion of an evidentiary

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27 "banked game" does not include a controlled game if the published rules of the game feature a player-
28 dealer position and provide that this position must be continuously and systematically rotated amongst
each of the participants during the play of the game.

⁵ MICS are regulations contained in CCR sections 12380-12396 and contain the minimum
requirements to operate a gambling establishment. (CCR section 12380(a).)

1 hearing approving the New Owner Applications with conditions.

2 12. On November 4, 2021, the Bureau filed a First Amended Accusation and Statement of
3 Issues (Accusation) with the Commission seeking revocation of the owner license issued to
4 Brown and denial of her Renewal Owner Application. The Accusation did not allege a failure to
5 prevent minors from loitering in prohibited areas of the cardroom as a cause for revocation.

6 13. On May 26, 2022, the Commission considered a request to deem Brown's Renewal
7 Owner Application abandoned. The Commission voted to retract the referral of the Renewal
8 Owner Application to an APA hearing and to deem the application abandoned. Based on these
9 actions, Brown's interim renewal license was no longer valid and her former owner license
10 number GEOW-002950 expired.

11 14. On September 8, 2022, the Bureau filed a Notice of Final Resolution of Case with the
12 Office of Administrative Hearings which resolved the Accusation.

13 *Initial Work Permit*

14 15. On May 23, 2022, the Bureau received Brown's Application for Employee Category
15 License and a Commission Work Permit or TPPPS Worker: Supplemental Information Form
16 (collectively, Application). Brown indicated on the Application that she has been a bookkeeper at
17 Outlaws since 2017.

18 16. On May 24, 2022, the Commission issued Brown Temporary Work Permit No.
19 GEWP-003075 valid through September 20, 2022.⁶

20 17. On or about February 28, 2023, the Commission received the Bureau's Work Permit
21 Initial Background Investigation Report (Bureau Report) recommending denial of Brown's
22 Application based on violations that occurred while she was the owner of Outlaws.

23 18. At its May 4, 2023, meeting, the Commission referred consideration of Brown's
24 Application to a GCA evidentiary hearing to be held pursuant to CCR section 12060.

25 19. On or about May 12, 2023, the Commission received a Notice of Defense form signed
26 by Brown's attorney, Tiffany Lichtig, requesting an evidentiary hearing for the Commission to

27 ⁶ At the time of issuance, temporary work permits were only valid for 120 days. The Commission
28 later amended its regulations to make temporary work permits valid for a period of two years and a
subsequent temporary license was issued to Brown.

1 consider the merits of Brown's Application, the Bureau Report, and any recommendation of the
2 Bureau.

3 20. On June 23, 2023, the Commission sent a Notice of Hearing to Brown and DAG
4 Waian providing that an evidentiary hearing would be held before the Commission on December
5 12, 14, and 15, 2023.

6 21. On October 27, 2023, the Commission received the Bureau's Statement of Reasons,
7 within which the Bureau requests that the Commission deny Brown's Application based on
8 violations that occurred while she was the sole owner of Outlaws.

9 **II. VIOLATIONS AT OUTLAWS UNDER BROWN'S OWNERSHIP**

10 22. In November 2018 and January 2019, the Bureau received complaints alleging
11 multiple violations at Outlaws. Bureau Field Representative Rosa Medina (Medina) was assigned
12 to investigate the complaints concerning Outlaws, which included making unannounced site visits
13 and reviewing surveillance footage. Medina testified that her investigatory findings resulted in
14 service of the May 2019 LOW, June 2019 LOW, and the Accusation. The violations and
15 concerns identified by Medina's investigation can be broken into five categories, all of which are
16 highly relevant to Brown's suitability for licensure.

17 *First Concern: Permitting Operation of Cardroom by an Unlicensed Individual*

18 23. The June 2019 LOW discusses multiple violations relating to duties performed by
19 Neal Franklin (Franklin) requiring licensure as an owner or key employee. Franklin was Outlaws'
20 landlord and owner of the adjoining restaurant. Franklin was not licensed by the Commission or
21 permitted by the local jurisdiction and was not a cardroom employee in any capacity.

22 24. On July 2, 2019, Brown responded to the June 2019 LOW with a CAP (July 2019
23 CAP). In the July 2019 CAP, Brown states that she will prohibit Franklin from entering the cage
24 or exercising any control over Outlaws' operations.

25 25. In March 2020, Medina requested additional surveillance footage from Outlaws to
26 verify that the surveillance system was fully operational after undergoing repairs. The footage
27 covered February 19-20, 2020 (February 2020 Footage). In reviewing the February 2020 Footage,
28 Medina saw many instances of Franklin making changes to Outlaws player waiting list and

1 interest board, speaking and gesturing towards gaming tables for patrons to take seats, assisting
2 and speaking with dealers, and requesting items to be passed to and from him and the cage by
3 Outlaws' employees.

4 *Second Concern: MICS Violations*

5 26. The June 2019 LOW outlined violations of MICS relating to the security of Outlaws'
6 cage, chips, and cash, including multiple instances of cash and chips left unattended and handled
7 by Franklin, and persons entering the cage unattended and without signing in on the cage log.

8 27. Brown's July 2019 CAP asserted that a new policy was instituted prohibiting
9 unlicensed persons from entering the cage and limiting TPPPS personnel from entering the cage
10 to access the TPPPS podium unless a key employee or owner was present. Brown agreed to put a
11 sign outside of the cage prohibiting entry of unlicensed persons and a sign inside the cage
12 reminding entrants to sign the cage log. Brown agreed to draft a formal procedure for unlicensed
13 persons to receive cage funds and represented that Outlaws would move all restaurant related
14 functions to another area in the building.

15 28. Thereafter, Medina reviewed the February 2020 Footage and found approximately
16 nine instances of chips left unattended on tables and several instances of Franklin handling
17 documents passed to him from the cage by Outlaws' employees. Cardroom staff also performed
18 the drop count on the gaming floor while two patrons were present after the cardroom was closed.

19 *Third Concern: Minors on the Gaming Floor*

20 29. According to Medina's February 14, 2019, progress report, Outlaws had a Security &
21 Surveillance Plan prohibiting persons under age 21 from entering the gaming floor. Medina also
22 noted in her January 10, 2019, report that there was a "21 year and older" sign at the entrance to
23 Outlaws.

24 30. According to the June 2019 LOW, Outlaws allowed minors to loiter on the gaming
25 floor in violation of the Act and Atascadero Municipal Code. Medina viewed surveillance
26 footage from November 17, 2018, showing that while Brown was present in the cardroom,
27 Franklin directed five patrons onto the gaming floor where they remained for approximately 1.5
28 hours; two of the patrons appeared to be between the age of 7 and 12 and another was likely

1 under age 18. Additionally, during a January 23, 2019, site visit Medina observed two adults
2 with a minor between age 10 and 12 on the gaming floor with Brown present.

3 31. In Brown's July 2019 CAP she agreed to institute a new policy excluding minors from
4 the gaming floor and provide training for staff. No further violations in this area were noted in
5 Medina's additional investigative reports.

6 *Concern Four: Failure to Wear Badges*

7 32. The May 2019 LOW asserts that a dealer was not wearing his badge on April 7, 2019,
8 while Brown played at the table.

9 33. On May 21, 2019, Brown responded with a CAP (May 2019 CAP) stating that all
10 dealers were warned that badges must be worn and those not wearing badges will be disciplined
11 accordingly.

12 34. The June 2019 LOW identifies additional violations discovered during an
13 unannounced site visit on January 10, 2019, and review of surveillance from November 19, 2018,
14 based on the failure of Outlaws' staff to wear badges, including waitresses and dealers.

15 35. The July 2019 CAP asserts that Brown will hold a training meeting to discuss the
16 badge requirements. Brown also claimed that the policy would require staff to report to the on-
17 duty key employee at the start of a shift to receive their badge and ensure a badge is worn.

18 36. Thereafter, the February 2020 Footage showed multiple instances of dealers and
19 waitresses working on the gaming floor without badges.

20 *Concern Five: Failure to Offer the Player-Dealer Position*

21 37. Medina's investigation was initiated in part due to receipt by the Bureau of a
22 complaint that Outlaws' dealers were not systematically and continuously offering the player-
23 dealer position as required. As part of her investigation, Medina reviewed surveillance footage
24 from March 30, 2019, and April 7, 2019, and confirmed that dealers did not systematically and
25 continuously offer the player-dealer position. Brown was present at the table as some of the
26 violations occurred.

27 38. The Bureau's May 2019 LOW alleges multiple violations due to dealers failing to
28 rotate the player-dealer position and specifically identifies by table, date and time, a specific

1 dealer who failed to comply with the rotation requirements. This dealer was identified in
2 Medina’s reports and will be referred to herein as Dealer Z.

3 39. Brown’s May 2019 CAP asserts that she will notify all dealers of the player-dealer
4 rotation requirement and any dealers not following the rule will be disciplined accordingly.
5 Brown states that Dealer Z was specifically spoken with about the requirement.

6 40. However, after receipt of the May 2019 CAP, Medina reviewed additional
7 surveillance for four days in July 2019 and found Dealer Z was still not properly rotating the
8 player-dealer position. On October 3, 2019, Medina called Outlaws and reported the non-
9 compliance by Dealer Z to a key employee.

10 41. Thereafter, when Medina reviewed the February 2020 Footage, she again found that
11 Dealer Z was not rotating the player-dealer position as required.

12 **RELEVANT STATUTORY AND REGULATORY PROVISIONS**

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

16 43. Public trust and confidence can only be maintained by strict and comprehensive
17 regulation of all persons, locations, practices, associations, and activities related to the operation
18 of lawful gambling establishments. Business and Professions Code section 19801(h).

19 44. An application for a work permit may be granted or denied by the Commission for any
20 cause specified in the Act. Business and Professions Code section 19912(d).

21 45. The Commission’s responsibilities include assuring that licenses, approvals, and
22 permits are not issued to, or held by, unqualified or disqualified persons, or persons whose
23 operations are conducted in a manner that is inimical to the public health, safety, or welfare.
24 Business and Professions Code section 19823(a)(1).

25 46. An “unqualified person” means a person who is found to be unqualified pursuant to
26 the criteria set forth in Section 19857, and “disqualified person” means a person who is found to
27 be disqualified pursuant to the criteria set forth in Section 19859. Business and Professions Code
28 section 19823(b).

1 47. The Commission has the power to deny any application for a license, permit, or
2 approval for any cause deemed reasonable by the Commission. Business and Professions Code
3 section 19824(b).

4 48. The burden of proving his or her qualifications to receive any license or work permit
5 from the Commission is on the applicant. Business and Professions Code section 19856(a) and
6 CCR section 12060(k).

7 49. CCR section 12040(a)(1) provides that “an application for an initial or renewal license
8 will be denied if the Commission finds that the applicant has not satisfied the requirements of
9 Business and Professions Code section 19857.” CCR section 12002(ac)(1)(D) provides that an
10 “initial license” includes an “Initial Commission work permit.” Similarly, CCR section
11 12002(am)(1)(D) provides that a “renewal license” includes a “Renewal Commission work
12 permit.”

13 50. No gambling license shall be issued unless, based on all of the information and
14 documents submitted, the Commission is satisfied that the applicant is a person of good character,
15 honesty, and integrity. Business and Professions Code section 19857(a).

16 51. No gambling license shall be issued unless, based on all of the information and
17 documents submitted, the Commission is satisfied that the applicant is a person whose prior
18 activities, criminal record, if any, reputation, habits, and associations do not pose a threat to the
19 public interest of this state, or to the effective regulation and control of controlled gambling, or
20 create or enhance the dangers of unsuitable, unfair, or illegal practices, methods, and activities in
21 the conduct of controlled gambling or in the carrying on of the business and financial
22 arrangements incidental thereto. Business and Professions Code section 19857(b).

23 52. Upon issuance or denial of a license or Commission work permit by the Commission, the
24 temporary license will become void and cannot be used thereafter. CCR section 12122(a) and (d). A
25 “temporary license,” as used in Commission regulations, is defined to include a temporary work
26 permit. CCR section 12002(ao).

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ASSESSMENT OF SUITABILITY FOR LICENSURE

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2 53. Brown's testimony at the hearing indicates that she received and carefully considered
3 the May 2019 LOW and June 2019 LOW and wrote CAPs to address the violations. However,
4 Brown did not follow through with ensuring compliance with the plans set forth in the CAPs
5 resulting in continuing violations in all areas with the exception of minors loitering on the gaming
6 floor.

7 54. Brown contends that Medina only reviewed surveillance footage from a limited
8 number of days, and overall, Brown was a compliant owner. However, the fact that Medina
9 discovered numerous violations over such a short time period can also indicate that there were
10 many additional violations that Medina did not discover.

11 55. Brown additionally argued that the violations and allegations raised by the Bureau did
12 not indicate any financial misfeasance on Brown's part and therefore the Commission should not
13 be concerned with her continuing to work for outlaws as a bookkeeper. However, the
14 bookkeeping duties Brown performs, as indicated in her testimony and Application, are extremely
15 important to maintaining the financial integrity of the gambling operation. Brown allowed many
16 violations to occur as an owner, including MICS violations relating to the security of chips and
17 funds without acting to cure the violations after notice. Therefore, Brown's arguments are not
18 persuasive.

19 56. Brown provided testimony and evidence that the new owners want to continue to
20 employ her as a bookkeeper. Brown further testified that she was put in a difficult position by the
21 lengthy process of consummating the sale over a period of time where she no longer wanted to
22 operate and manage the cardroom. This decision does not discuss that evidence in detail because
23 it was not sufficient to alleviate the Commission's concerns resulting from the five areas of
24 violations noted in Medina's reports, the May 2019 LOW, and June 2019 LOW.

25 57. Regarding the first concern relating to Brown's allowing Franklin, an unlicensed
26 person, to manage the cardroom, the June 2019 LOW provides multiple examples of violations
27 witnessed by Medina. In the July 2019 CAP, Brown claimed that she would prohibit Franklin
28 from entering the cage or exercising any control over operations. However, the February 2020

1 footage showed that Franklin continued to direct patrons and staff.

2 58. MICS constitute the minimum requirements for operation of a cardroom. Outlaws did
3 not meet these minimum requirements. Under Brown's ownership there was little regard for the
4 security of Outlaws' cage, chips, and cash, which continued after issuance of the June 2019
5 LOW. At the highest level of being an owner, Brown did not ensure the security of the funds
6 flowing through the cardroom.

7 59. While there was no evidence of recurring violations of minors on the gaming floor
8 after the May 2019 LOW, the fact that such violations occurred at all, and Brown's explanation
9 for the violations, are extremely concerning to the Commission. The Act prohibits persons under
10 21 years of age from loitering in or about the gaming floor, with a knowing violation constituting
11 a misdemeanor.⁷ Brown testified that she believed minors were allowed on the gaming floor since
12 food was served there. However, Outlaws had a written policy and sign at the entrance
13 prohibiting minors from entry. Brown willfully ignored the information right in front of her,
14 exposing young children to an activity that the Legislature has determined should not be
15 accessible to persons under age 21. Further, the instances noted by Medina's investigation of
16 minors loitering in the cardroom were egregious in that the minors were very young and present
17 in the cardroom for extended periods of time while Brown was also present.

18 60. Failure of Outlaws staff to wear badges extended amongst all positions. The measures
19 set forth in the July 2019 CAP were not put into place, as evidenced from the February 2020
20 footage which showed multiple staff without visible badges.

21 61. Finally, the failure of dealers to rotate the player-dealer position was egregious,
22 particularly in relation to Dealer Z. Brown was specifically alerted that Dealer Z was not rotating
23 the player-dealer position in the June 2019 LOW and again through an October 2019 phone call
24 from Medina to a key employee. Yet, when Medina viewed the February 2020 footage, Dealer Z
25 remained non-compliant. Offering games that do not comply with the Bureau's approved game
26 rules and the rotation requirements essentially resulted in the provision of games outside the
27 authority of the license provided to Brown and Outlaws.

28 ⁷ Section 19941 contains the prohibitions for persons under 21 relating to controlled gambling.

1 62. Brown created a culture of non-compliance at Outlaws as demonstrated by the failure
2 of Outlaws’ employees to follow a broad range of legal requirements even after receiving written
3 notice and training. Some of the violations noted occurred in Brown’s presence. These
4 circumstances indicate that Brown does not have the requisite integrity to work in the industry,
5 particularly in a position as important as bookkeeping.

6 63. Based on the foregoing, Brown failed to meet her burden of demonstrating that she is
7 a person of good character, honesty, and integrity. Therefore, Brown is unqualified for licensure
8 pursuant to Business and Professions Code section 19857(a) and her application must be denied
9 pursuant to CCR section 12040(a)(1).

10 64. Further, the serious nature of the violations and failure to correct them after receipt of
11 the May 2019 LOW and June 2019 LOW, results in the Commission finding that Brown is a
12 person whose prior activities and habits pose a threat to the effective regulation and control of
13 controlled gambling and enhances the dangers of unsuitable activities in the conduct of controlled
14 gambling. Therefore, Brown is unqualified for licensure pursuant to Business and Professions
15 Code section 19857(b) and her application must be denied pursuant to CCR section 12040(a)(1).

16 65. All documentary and testimonial evidence submitted by the parties that is not
17 specifically addressed in this Decision and Order was considered but not used by the Commission
18 in making its determination on Brown’s Application.

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NOTICE OF APPLICANT’S APPEAL RIGHTS

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Brown has the following appeal rights available under state law:

CCR section 12064, subdivisions (a) and (b) provide, in part:

(a) After the Commission issues a decision following a GCA hearing conducted pursuant to Section 12060, 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. A request for reconsideration must be:

- (1) Made in writing to the Commission, copied to the Complainant. The Bureau may provide a written response to the Commission within 10 calendar days of receipt of the request; and
- (2) Received by the Commission and Complainant within 30 calendar days of service of the decision, or before the effective date specified in the decision, whichever is earlier.

(b) A request for reconsideration must state the reasons for the request, which must be based upon either:

- (1) 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,
- (2) Other good cause which the Commission may decide, in its sole discretion, merits reconsideration.

Business and Professions Code section 19912, subdivision (e) provides:

An order of the commission denying an application for, or placing restrictions or conditions on, a work permit, including an order declining to issue a work permit following review pursuant to paragraph (3) of subdivision (c), may be reviewed in accordance with subdivision (f) of Section 19870.

Business and Professions Code section 19870, subdivision (f) 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.

CCR section 12066, subdivision (c) provides, in part:

Neither the right to petition for judicial review nor the time for filing the petition shall be affected by failure to seek reconsideration.

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ORDER

- 1. Dora Brown’s Application for a Work Permit is DENIED.
- 2. Dora Brown’s Temporary Work Permit, Number GEWP-003075 is void and cannot be used hereafter.
- 3. No costs are awarded.
- 4. Each side to pay its own attorneys’ fees.

This Order is effective on March 22, 2024

Dated: 2/22/2024 Signature: 
DocuSigned by: 38D0AB38C651466...
 Paula LaBrie, Chair

Dated: 2/22/2024 Signature: 
DocuSigned by: 2B4CE9520F8845C...
 Eric Heins, Commissioner

Dated: 2/22/2024 Signature: 
DocuSigned by: 7722F4571120449...
 William Liu, Commissioner

Dated: 2/22/2024 Signature: 
DocuSigned by: 14B4AD3B90F8462...
 Edward Yee, Commissioner