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BEFORE THE  
CALIFORNIA GAMBLING CONTROL COMMISSION

In the Matter of the Application for Third-Party  
Proposition Player Services License  
Regarding:  
  
TERESA DIEHL-GOVEA  
  
Respondent.

BGC Case No. BGC-HQ2019-00028SL  
CGCC Case No. CGCC-2019-0725-14Fi

**DECISION AND ORDER**

Hearing Date: December 16, 2019  
Time: 10:00 a.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, in Sacramento, California, on December 16, 2019.

Therese Hickey, Deputy Attorney General, State of California (DAG Hickey), represented complainant Stephanie Shimazu, Director of the Bureau of Gambling Control (Bureau), Department of Justice, State of California.

Respondent Teresa Diehl-Govea (Diehl-Govea) appeared on her own behalf.

During the evidentiary hearing, Presiding Officer Jason Pope took official notice of the Notice of Hearing, with enclosures, sent by the Commission to Diehl-Govea, Designated Agent Chau On of Pacific United Services, Inc. (DA On), and DAG Hickey, via certified mail, on September 24, 2019.

Presiding Officer Jason Pope also took official notice of the Commission’s Conclusion of Prehearing Conference letter, the Bureau’s Statement of Reasons, and Diehl-Govea’s signed Notice of Defense.

During the evidentiary hearing, Presiding Officer Jason Pope accepted into evidence the following exhibits offered by the Bureau:

- (1) Copies of Statement to Respondent, Statement of Reasons, Business and Professions Code sections 19870 and 19871, California Code of Regulations section 12060, Declaration of Service by Certified Mail and

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Return Receipt, dated October 23, 2019, Bates Nos. BGC0001-0026;

(2) Bureau of Gambling Control Documents:

- a. Application for Third-Party Proposition Player Services License for Supervisor, Player or Other Employee, dated October 24, 2016, Bates Nos. BGC0027-0028;
- b. Level I Supplemental Information, dated September 7, 2016, Bates Nos. BGC0029-0038; and
- c. Third-Party Player Initial Background Investigation Report, Level III, with attachments, dated June 2019, Bates Nos. BGC0039-0047;

(3) California Gambling Control Commission Documents:

- a. Conclusion of Prehearing Conference letter, dated October 30, 2019, Bates Nos. BGC0048-0054;
- b. Notice of Hearing letter to Respondent, dated August 16, 2019, Bates Nos. BGC0055-0070;
- c. Notice of Scheduled Commission Meeting (App. No. 92122), Bates No. BGC0071; and
- d. Referral of Third-Party Proposition Player Services License application to an Evidentiary Hearing to Respondent, dated August 1, 2019, with attached blank Notice of Defense form, Bates Nos. BGC0072-0075;

(4) Bureau of Gambling Control Registration History for Teresa Elizabeth Diehl-Govea for dates April 15, 2013 through July 16, 2015, and Certificate of Official Records (Evidence Code section 1280) signed by Kathi Hegelein, Manager I, Bureau of Gambling Control, Department of Justice, dated August 12, 2019, Bates Nos. BGC0076-0077;

(5) Certified copies of Municipal Court of Long Beach Courthouse Judicial District, Los Angeles County Court Case No. 92M00160 documents including:

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- a. Electronic Docket on file, Bates Nos. BGC0078-0081;
  - b. Booking and Property Records dated January 5, 1992, Additional Information to be Added to Report Made, Bates Nos. 0082-0085; and
  - c. Disposition of Arrest and Court Action, Bates Nos. BGC0086-0087;
- (6) Bureau of Gambling Control Correspondence and Respondent's Responses:
- a. Letter to Chau On, Designated Agent, Pacific United Services, Inc., dated December 4, 2018, re Additional Information and/or Documentation Required, Bates Nos. BGC0088-0089;
  - b. Email from Teresa Govea to Rachel Glensor dated December 11, 2018, re Attached is the information requested, Bates Nos. BGC0090-0091;
  - c. Letter to Karrie On, Designated Agent, Pacific United Services, Inc., dated December 27, 2018, re Additional Information and/or Documentation Required, Bates Nos. BGC0092-0093; and
  - d. Email from Teresa Govea to Rachel Glensor, dated December 27, 2018, re forwarding copy of email dated December 11, 2018 in re: additional information requested, Bates Nos. BGC0094-0096;
- (7) Appointment of Designated Agent for Owners and Proposition Players, dated October 26, 2018, Bates No. BGC0097;
- (8) Miscellaneous emails between Kathi Hegelein, Sonny Xiong, Quinn Hedges, Rachel Glensor, Chau On, Teresa Govea re: Follow up questions, Bates Nos. BGC0098-0101;
- (9) Notice of Defense dated August 11, 2019, Bates Nos. BGC0102-0103;
- (10) Level I Supplemental Information form, pages 7 through 9, dated August 18, 2014, Bates Nos. BGC0104-0106; and Level I Supplemental Information form, pages 7 through 9 dated February 27, 2013, Bates Nos. BGC0107-0109.

1 During the evidentiary hearing, Presiding Officer Jason Pope also accepted into evidence  
2 the following exhibit offered by Diehl-Govea:

3 (A) Letter of reference from Designated Agent Chau On, Bates No. APP001.

4 The administrative record was left open to have the Bureau submit additional  
5 documentation regarding Diehl-Govea's prior applications and disclosures regarding her criminal  
6 conviction and the vehicle report referenced in the police report regarding her prior conviction.

7 Presiding Officer Jason Pope accepted into evidence the following additional exhibit  
8 offered by the Bureau:

9 (11) BGC Letter to Jason Pope, Presiding Officer, California Gambling Control  
10 Commission re: December 27, 2019 Order and Instructions for Further  
11 Evidence Following Hearing, dated December 30, 2019, Bates No. BGC-  
12 0110; BGC Certification of Official Records, dated December 30, 2019,  
13 and attached Level I Supplemental Information form, dated February 27,  
14 2013, Bates Nos. BGC0111-0119; Level I Supplemental Information form,  
15 dated August 18, 2014, Bates Nos. BGC0120-0129; and Certified Players  
16 Inc. Applicant's Statement and Agreement, dated July 16, 2014, Bates No.  
17 BGC0130.

18 The record was closed and the matter was submitted on January 7, 2020.

## 19 FINDINGS OF FACT

### 20 **Procedural History**

21 1. On or about October 27, 2016, the Bureau received an Application for Third-Party  
22 Proposition Player Services License for Player and a Level I Supplemental Information form  
23 (Supplemental) (collectively, Application) from Diehl-Govea.

24 2. On or about June 20, 2019, the Commission received a Third-Party Player Initial  
25 Background Investigation Report on Diehl-Govea from the Bureau. In this report, the Bureau  
26 recommends that the Commission deny Diehl-Govea's Application.

27 3. At its July 25, 2019 meeting, the Commission voted to refer the consideration of  
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1 Diehl-Govea's Application to a Gambling Control Act evidentiary hearing pursuant to CCR  
2 sections 12056(a) and 12060.

3 4. On or about August 11, 2019, Diehl-Govea submitted a signed notice of defense  
4 requesting an evidentiary hearing on the consideration of her Application.

5 5. On or about September 24, 2019, the Commission sent a Notice of Hearing, via  
6 certified mail, to Diehl-Govea, DA On, and DAG Hickey.

7 6. On or about October 23, 2019, the Bureau sent a Statement of Reasons to Diehl-Govea  
8 and DA On via certified mail. The Commission received the Statement of Reasons from the  
9 Bureau on or about October 23, 2019. In the Statement of Reasons, the Bureau recommends that  
10 the Commission deny Diehl-Govea's Application.

11 7. On or about October 30, 2019, the noticed Prehearing Conference was held before  
12 Presiding Officer Jason Pope, Attorney III of the Commission. DAG Hickey attended on behalf  
13 of the Bureau. Diehl-Govea appeared on her own behalf.

14 8. On or about October 30, 2019, the Commission sent a Conclusion of Prehearing  
15 Conference letter to Diehl-Govea and DAG Hickey.

16 9. The Commission heard this matter on December 16, 2019. The Bureau was  
17 represented throughout the hearing by DAG Hickey. Diehl-Govea appeared on her own behalf.

### 18 **Diehl-Govea's Employment History in Controlled Gambling**

19 10. From approximately January 2013 to July 2014, Diehl-Govea was employed as a  
20 third-party proposition player with Team View Player Services, LLC, a third party provider of  
21 proposition player services.

22 11. From approximately June 2014 to July 2015, Diehl-Govea was employed as a third-  
23 party proposition player with Certified Players, Inc., a third party provider of proposition player  
24 services.

25 12. From approximately July 2015 to the present, Diehl-Govea has been employed by  
26 Pacific United Service, Inc., a third party provider of proposition player services, as a third-party  
27 proposition player under registration number TPPL-015467. Diehl-Govea's registration expires  
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1 on February 28, 2021.

2 13. There was no evidence presented during the evidentiary hearing that Diehl-Govea has  
3 had any employment-related issues during her approximately seven years in controlled gambling.

4 **Diehl-Govea's Criminal History**

5 14. On or about January 29, 1992, Diehl-Govea was convicted by the Los Angeles County  
6 Superior Court of violating Penal Code section 487h(a), grand theft of the cargo of another, a  
7 misdemeanor, in the case of *People v. Diehl* (Super. Ct. Los Angeles County, 1992, No.  
8 92M00160). Diehl-Govea was sentenced to four days in jail and three years of probation, and  
9 ordered to complete 20 days of community service and pay a fine and restitution.

10 15. According to the Arrest Report, a police officer saw a parked red Chevrolet pick-up  
11 truck with a broken left rear window. The police officer performed a license plate check and it  
12 returned with a Department of Justice stop, indicating a possible stolen vehicle. The police officer  
13 later saw two subjects, including Diehl-Govea, walk toward the vehicle. After momentarily losing  
14 sight of the vehicle, the police officer located the vehicle. The police officer made a traffic stop of  
15 the vehicle. The police officer ordered the two subjects out of the vehicle at gunpoint. The  
16 passenger was released while the driver (Diehl-Govea) was placed under arrest.

17 16. The police officer wrote that Diehl-Govea stated that she had "just woke up" and that  
18 her friend said that there was a stolen vehicle outside. Diehl-Govea stated that she decided to  
19 drive the vehicle to the store "for some milk" and then to a friend's house. Diehl-Govea stated  
20 that she did not think she would get caught. She stated that she learned how to start the vehicle  
21 from a friend named "Carlos."

22 17. On or about December 11, 2018, Diehl-Govea wrote a letter to the Bureau regarding  
23 the circumstances surrounding her criminal conviction. Diehl-Govea wrote that her roommate  
24 (Roommate) at the time woke her up and asked if Diehl-Govea could drive Roommate to the  
25 store to get some milk for Roommate's kids. Roommate told Diehl-Govea that a friend of  
26 Roommate let her borrow his vehicle. When Diehl-Govea met Roommate outside, the vehicle  
27 was on (running) and Roommate was in the passenger seat. In less than ten minutes, the vehicle  
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1 was surrounded by police cars. Diehl-Govea states that she was unaware that the vehicle was  
2 stolen.

3 18. On or about July 2, 2019, Diehl-Govea wrote a letter to the Bureau regarding the  
4 discrepancies between her statement regarding the circumstances surrounding her criminal  
5 conviction and the information contained in the Arrest Report. Diehl-Govea states that her  
6 statement to the Bureau is what she remembers from that experience. She states that the following  
7 statements in the Arrest Report are false:

- 8 a. That she started the vehicle and learned how to do so through a friend; and
- 9 b. That she knew the vehicle was stolen.

10 Diehl-Govea states that she does not know how to steal or start a vehicle without a key. She states  
11 that she was awoken by Roommate to take her to the store to get milk for her kids, and that when  
12 she got into the vehicle it was already running with Roommate in the passenger seat. Diehl-Govea  
13 states she did not attempt to start the vehicle.

#### 14 **Diehl-Govea's Application**

15 19. Applications for licensure by the Commission are submitted on forms furnished by the  
16 Bureau. An applicant for licensing shall make full and true disclosure of all information to the  
17 Bureau and Commission as necessary to carry out the policies of this state relating to licensing,  
18 registration, and control of gambling.

19 20. An application consists of two parts. The first part is two pages and consists of four  
20 sections, including applicant information. The second part of an application is the Supplemental,  
21 which consists of 9 pages. The Supplemental contains 4 sections and requires that the applicant  
22 disclose, among other things, his or her criminal history information. All of the information  
23 requested on the Application and Supplemental has been considered through the legislative and  
24 regulatory processes and determined necessary in order for the Commission to discharge its duties  
25 properly.

26 21. The Bureau relies, in large part, on the applicant's disclosures while conducting a  
27 background investigation. The failure to honestly and accurately disclose information on an  
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1 application subverts the Bureau’s efforts to conduct a thorough and complete investigation.

2 22. Both the substance of an applicant’s disclosures, and the truthfulness and  
3 thoroughness of an applicant’s disclosures, are considered by the Bureau in making a  
4 recommendation as to the applicant’s suitability for licensure, and by the Commission in making  
5 a determination whether to approve or disapprove a license application.

6 23. The last portion of the Supplemental is a Declaration to be signed under the penalty of  
7 perjury that all of the information contained in the Supplemental is “true, correct, and complete.”  
8 Diehl-Govea signed the Declaration on September 6, 2016.

9 *Criminal History Information*

10 24. Section (4) of the Supplemental requires that the applicant disclose his or her  
11 criminal history information.

12 25. On her Supplemental, Diehl-Govea checked the box marked “no” to Question (4),  
13 which asks the applicant “Have you ever engaged in any act involving dishonesty or moral  
14 turpitude charged or chargeable as a criminal offense?”

15 26. Diehl-Govea also checked to the box marked “no” to Question (5), which asks the  
16 applicant “Have you ever been convicted of an offense involving dishonesty or moral turpitude?”

17 27. On or about December 11, 2018, Diehl-Govea wrote a letter to the Bureau regarding  
18 her failure to disclose the criminal conviction on her Application. Diehl-Govea stated that she  
19 believed that Questions (4) and (5) on the Application pertained to Question (2), which asks for  
20 criminal convictions within the previous ten years.<sup>1</sup> She also stated that while she has been  
21 convicted of an offense involving dishonesty or moral turpitude (which would require an  
22 affirmative answer to Question 5), she had never engaged in any act involving dishonesty or  
23 moral turpitude (Question 4). Thus, Diehl-Govea stated that the answer to Question (5) is “yes,”  
24 but the answer to Question (4) would remain “no.”

25 **Diehl-Govea’s Previous Applications for Third-Party Proposition Player Registrations**

26 28. On previous applications for third-party proposition player registrations that were

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28 <sup>1</sup> Question (2) asks the applicant “Have you been convicted of a misdemeanor within the last 10 years?”

1 signed by Diehl-Govea on February 27, 2013 and August 18, 2014, Diehl-Govea checked the box  
2 marked “yes” to Question (5) and provided the required details regarding her conviction.

3 **Diehl-Govea’s Letter of Reference**

4 29. Diehl-Govea submitted a letter of reference in support of her Application from DA  
5 On. DA On states that Diehl-Govea has no derogatory records on file; that she is well trusted  
6 among her colleagues who often approach her to mediate conflicts or answer questions; and that  
7 she shows up on time and often goes above and beyond her duties as a lead banker. DA On states  
8 that she is aware of Diehl-Govea’s conviction.

9 **Diehl-Govea’s Testimony During the Evidentiary Hearing**

10 30. During the evidentiary hearing, Diehl-Govea testified regarding her conviction and her  
11 failure to disclose the conviction on her Application.

12 31. Regarding the circumstances surrounding her conviction, Diehl-Govea testified that  
13 Roommate woke her up in the morning on a Saturday or Sunday and asked Diehl-Govea to take  
14 her to the store to get milk for her kids. Diehl-Govea saw Roommate outside with a guy  
15 Roommate was barely talking with. By the time Diehl-Govea exited the apartment, Roommate  
16 was already in the vehicle with the engine running. Diehl-Govea drove to the store, which was  
17 approximately three blocks away. Diehl-Govea stayed in the car with the engine running while  
18 Roommate obtained the milk. Within 5 or 10 minutes, the vehicle was surrounded by police cars.  
19 Diehl-Govea testified that she never started or re-started the vehicle and did not recall whether  
20 there was a key in the ignition. She testified that she did not steal the vehicle, did not know the  
21 vehicle was stolen, and does not recall anybody named “Carlos.” Diehl-Govea did not have her  
22 own vehicle or a driver’s license at the time, and admitted to driving without a driver’s license.

23 32. Diehl-Govea also testified that she does not recall being questioned by the police  
24 officer or what she told the police officer.

25 33. Regarding her failure to disclose the conviction on her Application, Diehl-Govea  
26 testified that she went too quickly through the Application and answered Question (5) incorrectly.  
27 She also testified that she thought Questions (4) and (5) pertained to Question (2) and only  
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1 required the disclosure of misdemeanor convictions within the last 10 years. She further testified  
2 that she was not trying to hide anything when filling out her Application.

### 3 **Assessment of Diehl-Govea's Suitability for Licensure**

4 34. There are three significant issues regarding Diehl-Govea's suitability for licensure.  
5 The first issue is Diehl-Govea's conviction for violating Penal Code section 487h(a), grand theft  
6 of the cargo of another, a misdemeanor involving dishonesty. The second issue is Diehl-Govea's  
7 failure to disclose this conviction on her Application. The third issue relates to the discrepancies  
8 between Diehl-Govea's recitation of the circumstances surrounding her criminal conviction and  
9 the information provided by the police officer in the Arrest Report.

10 35. Diehl-Govea's misdemeanor conviction for violating Penal Code section 487h(a),  
11 grand theft of the cargo of another, is a serious crime involving dishonesty. However, the  
12 criminal conviction took place in 1992, approximately 29 years ago. Given the significant amount  
13 of time that has elapsed, and the fact that Diehl-Govea has not had any subsequent criminal  
14 convictions, the misdemeanor conviction does not pose a threat to the public interest of this state  
15 or to the effective regulation and control of controlled gambling.

16 36. It is undisputed that Diehl-Govea failed to disclose her misdemeanor conviction on her  
17 Application. An unexcused failure to disclose information on an application, particularly an  
18 applicant's criminal history,<sup>2</sup> is itself material to an applicant's qualification for licensure. Diehl-  
19 Govea offers two explanations for her failure to disclose: (1) she went through the Application  
20 too quickly; and (2) she incorrectly thought that the Application only required disclosure of  
21 misdemeanor convictions within the last 10 years. She also testified that she was not trying to  
22 hide anything when filling out her Application. Given that Diehl-Govea disclosed her  
23 misdemeanor conviction on two prior applications and provided the required details regarding her  
24 conviction on both prior applications, her failure to disclose the same criminal conviction on this  
25 Application was an unintentional mistake. Therefore, her failure to disclose her criminal

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26 <sup>2</sup> The importance of an applicant disclosing his or her criminal history is further demonstrated by Business  
27 and Professions Code section 19857(b), which specifically requires that the Commission must be satisfied that an  
28 applicant's "criminal record" does not pose a threat to the public interest of this state or to the effective regulation  
and control of controlled gambling before the Commission may issue a gambling license to an applicant.

1 conviction on the Application is excused and does not reflect negatively upon her character,  
2 honesty, or integrity.

3 37. The material discrepancies between Diehl-Govea's recitation of the circumstances  
4 surrounding her criminal conviction and the information provided by the police officer in the  
5 Arrest Report are problematic. The discrepancies include the following:

6 a. In the Arrest Report, the police officer wrote that Diehl-Govea stated: (1) that  
7 her friend told her there was a stolen vehicle outside; (2) that she did not think  
8 she would get caught; and (3) that she learned how to start the vehicle from a  
9 friend named "Carlos."

10 b. In her written statements to the Bureau and while testifying during the  
11 evidentiary hearing, Diehl-Govea stated: (1) that she was unaware that the  
12 vehicle was stolen; (2) that she did not start the vehicle; (3) that she does not  
13 know how to start a vehicle without a key; and (4) that she does not recall  
14 anybody named "Carlos."

15 38. Diehl-Govea was able to recall specific details of the circumstances surrounding her  
16 conviction, including: (1) that Roommate woke her up and asked Diehl-Govea to drive her to the  
17 store for some milk for her kids; (2) that Roommate was outside with a guy she was barely  
18 talking with; (3) that Roommate was already in the passenger seat when Diehl-Govea approached  
19 the vehicle; (4) that the vehicle was already running when Diehl-Govea entered the vehicle; (5)  
20 that the vehicle was still running when Roommate entered and exited the store to obtain some  
21 milk; and (6) that when the police officers arrived on the scene they had their guns drawn.

22 39. However, despite being able to recall specific details of the circumstances surrounding  
23 her conviction, Diehl-Govea testified during the evidentiary hearing that she does not recall being  
24 questioned by the officer or what she told the police officer. While she cannot remember what she  
25 stated to the police officer, Diehl-Govea insists that the statements attributed to her by the police  
26 officer are inaccurate.

27 40. Overall, Diehl-Govea has excellent recall of various details of the circumstances  
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1 surrounding her conviction, but has no recollection of her conversation with the police officer.  
2 The statements attributed to Diehl-Govea in the Arrest Report are the most damaging with respect  
3 to her knowledge and actions in the grand theft of a vehicle. The Arrest Report contains indicia of  
4 reliability, particularly with the narrative details regarding starting the car and the reference to  
5 “Carlos.” Diehl-Govea was not able to produce any information to impeach the credibility of the  
6 Arrest Report. Diehl-Govea testified that there is no reason for the police officer to have lied in  
7 the report. As a result, Diehl-Govea fails to convince that her version of the circumstances  
8 surrounding her conviction are more accurate or reliable than the facts contained in the Arrest  
9 Report.

10 41. Based on the foregoing, Diehl-Govea has failed to meet her burden of proving that she  
11 is a person of honesty.

12 42. Diehl-Govea’s letter of reference from DA On was individualized and credible, and is  
13 persuasive that Diehl-Govea is a good employee and hardworking, dedicated, and well-respected.  
14 Diehl-Govea also has a work history in controlled gambling without any employment-related  
15 issues. Both the letter of reference and her work history in controlled gambling reflect positively  
16 on Diehl-Govea’s character. However, these facts are insufficient for Diehl-Govea to overcome  
17 her failure to meet her burden of establishing that she is a person of honesty.

18 43. All documentary and testimonial evidence submitted by the parties that is not  
19 specifically addressed in this Decision and Order was considered but not used by the Commission  
20 in making its determination on Diehl-Govea’s Application.

21 44. The matter was submitted for Commission consideration on January 7, 2020.

## 22 LEGAL CONCLUSIONS

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

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

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

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

10 49. The burden of proving his or her qualifications to receive any license from the  
11 Commission is on the applicant. Business and Professions Code section 19856(a).

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

15 51. At an evidentiary hearing pursuant to Business and Professions Code sections 19870  
16 and 19871 and CCR section 12060(b), the burden of proof rests with the applicant to prove his or  
17 her qualifications to receive any license under the Gambling Control Act. CCR section 12060(i).

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

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

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1           54. No gambling license shall be issued unless, based on all of the information and  
2 documents submitted, the commission is satisfied that the applicant is a person that is in all other  
3 respects qualified to be licensed as provided in this chapter. Business and Professions Code  
4 section 19857(c).

5           55. An applicant shall be ineligible for registration [as a third party proposition player] if  
6 the applicant has had an application denied under this chapter or the [Gambling Control] Act.  
7 CCR section 12204(d).

8           56. Any regular registration shall be cancelled if the Commission determines after a  
9 noticed hearing that the registrant is ineligible for registration. CCR section 12205(a).

10           57. A requester shall be ineligible for licensing [as a third party proposition player] if the  
11 request to convert is for licensing as an owner, supervisor, or player, and the requester has had an  
12 application denied under this chapter or the [Gambling Control] Act. CCR section 12218.11(d).

13           58. A requester shall be ineligible for licensing [as a third party proposition player] if the  
14 request to convert is for licensing as an owner, supervisor, or player, and the requester has failed  
15 to meet the requirements of Business and Professions Code sections 19856 or 19857. CCR  
16 section 12218.11(e).

17           59. Diehl-Govea has not met her burden of proving that she is a person of honesty.  
18 Therefore, Diehl-Govea is unqualified for licensure pursuant to Business and Professions Code  
19 section 19857(a).

20           60. Given that Diehl-Govea is unqualified for licensure pursuant to Business and  
21 Professions Code section 19857(a), Diehl-Govea is therefore ineligible for licensing as a third  
22 party proposition player pursuant to CCR section 12218.11(e).

23           61. Based on the foregoing, Diehl-Govea's Application is subject to denial pursuant to  
24 CCR section 12218.11(e). As a result, Diehl-Govea is ineligible for licensing as a third party  
25 proposition player pursuant to CCR section 12218.11(d) and ineligible for registration as a third  
26 party proposition player pursuant to CCR section 12204(d). Therefore, Diehl-Govea's third party  
27 proposition player registration is subject to cancellation pursuant to CCR section 12205(a).  
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ORDER

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2 1. Teresa Diehl-Govea's Application for Third-Party Proposition Player License is  
3 DENIED.

4 2. Teresa Diehl-Govea's Third Party Proposition Player Services Registration  
5 Number TPPL-015467 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 April 13, 2020.

9  
10 Dated: 3/12/2020

Signature:   
Jim Evans, Chairman

11  
12 Dated: 3/12/2020

Signature:   
Paula LaBrie, Commissioner

13  
14 Dated: 3/12/2020

Signature:   
Gareth Lacy, Commissioner

15  
16 Dated: 3/12/2020

Signature:   
Trang To, Commissioner