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BEFORE THE  
CALIFORNIA GAMBLING CONTROL COMMISSION

In the Matter of the Application for Third-Party  
Proposition Player Services Player License for:  
  
**Vincent Anthony Sanchez**  
  
Applicant.

CGCC Case No. CGCC-2021-0812-7C  
BGC Case No. HQ2021-00030SL

**DECISION AND ORDER**

Hearing Date: September 15, 2022  
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, and held via Zoom video conference, on September 15, 2022.

James G. 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. Vincent Anthony Sanchez (Sanchez) attended on his own behalf without representation.

During the evidentiary hearing, Presiding Officer Kate Patterson (Presiding Officer) took official notice of the Notice and Agenda of Commission Hearing, the Commission’s Conclusion of Prehearing Conference letter, the Commission’s Notice of Hearing with attachments (A) Sanchez’s Application, and (B) the Bureau’s background investigation report, the Bureau’s Statement of Reasons, and Sanchez’s signed Notice of Defense.

Pursuant to a stipulation between the parties, the Presiding Officer accepted into evidence Exhibits 1 through Exhibit 9 offered by the Bureau, which contain bates numbering “BGC – 001” through “BGC – 096” with a table of contents that separately identifies each document. Also pursuant to a stipulation, the Presiding Officer accepted into evidence Applicant’s Exhibit A, a one-page letter of reference from Sanchez’s current supervisor, Hakop Jack Mushyan. The record was closed and the matter was submitted for decision on September 15, 2022.

FINDINGS OF FACT

1  
2 1. On or about November 16, 2020, the Bureau received an initial Application for Third-  
3 Party Proposition Player Services License for Supervisor, Player or Other Employee and Level II  
4 Supplemental Information (Application) from Sanchez. The Application is to allow for Sanchez’s  
5 employment as a third-party proposition player for KB Ventures, a corporation that is a registered  
6 third-party proposition player services provider.

7 2. On or about May 25, 2021, the Bureau submitted a Third-Party Supervisor Initial  
8 Background Investigation Report (Report) to the Commission recommending that Sanchez’s  
9 Application be denied. On May 24, 2021, Yolanda Morrow, then Assistant Director, and Brian  
10 Gilleland, Manager II with the Bureau, had a meeting with Sanchez by phone and informed him  
11 generally of the basis for the Bureau’s recommendation to deny his Application.

12 3. At its August 12, 2021 meeting, the Commission referred consideration of Sanchez’s  
13 Application to an evidentiary hearing to be conducted pursuant to Business and Professions Code  
14 sections 19870 and 19871, and California Code of Regulations, title 4, section 12056, subdivision  
15 (a).

16 4. On or about August 30, 2021, Sanchez submitted his Notice of Defense requesting an  
17 evidentiary hearing on his Application.

18 5. On April 5, 2022, the Commission sent a Notice of Hearing to Sanchez. The hearing  
19 was set for September 15, 2022.

20 6. On or about August 1, 2022, the Bureau sent a Statement of Reasons to Sanchez via  
21 certified mail. The Commission received the Statement of Reasons on August 1, 2022. In the  
22 Statement of Reasons, the Bureau requests that the Commission deny Sanchez’s Application.

23 7. On July 28, 2022, the noticed Prehearing Conference was held before the Presiding  
24 Officer. DAG Waian attended on behalf of the Bureau. Sanchez attended on his own behalf.

25 8. On July 29, 2022, the Presiding Officer sent a Conclusion of Prehearing Conference  
26 letter, via e-mail, to Sanchez and DAG Waian.

27 **SANCHEZ’S EMPLOYMENT HISTORY IN CONTROLLED GAMBLING**

28 9. KB Ventures has employed Sanchez as a player since approximately June 2020. On or

1 about October 14, 2020, the Commission issued third-party proposition player registration  
2 number TPPL-026189 to Sanchez.

3 10. Sanchez was employed as a cashier by Club One Casino in Fresno, California, from  
4 December 2015 to March 2020.

5 11. Sanchez was employed as a count-room clerk by Table Mountain Casino in Friant,  
6 California, from October 1999 to December 2015.

7 **SANCHEZ’S FAILURE TO PROVIDE DEROGATORY EMPLOYMENT HISTORY TO THE BUREAU**

8 12. Sanchez indicated on his Application, under penalty of perjury, that he resigned from  
9 his position at Table Mountain Casino for other employment “to work normal hours.” In fact, he  
10 was terminated for violating company policy and he is not eligible to be re-hired by Table  
11 Mountain Casino. Sanchez admits it was “wrong” for him to use the phrase “to work normal  
12 hours” on his Application to explain why he left his employment at Table Mountain Casino.

13 13. On March 26, 2021, in response to an inquiry from the Bureau, Sanchez provided a  
14 detailed written explanation of the circumstances leading to his termination from Table Mountain  
15 Casino. Sanchez also explained that he began to work at Club One very soon after his termination  
16 from Table Mountain:

17 “Within two weeks of being terminated from Table mountain Casino I  
18 gained full employment at Club One Casino. From the months of January  
19 2016 to to [sic] December 2016 I was employed every day at Club One  
20 Casino as a cashier. I worked there until March 17[,] 2020 when COVID  
21 shut down the casino. I applied at 500 club casino to be a third party  
22 player in august (maybe, not good with dates) and was hired. I didn’t put  
23 that I was fired from Table Mountain casino because it’s embarrassing that  
24 a company fired me after working for them for 17 years. Also HR from  
25 table mountain informed me that they don’t discuss if an employee had  
26 been fired or quit, all that they would say is that they were employed from  
27 this time to that.”

24 14. During the hearing, Sanchez admits that he knew he was terminated from Table  
25 Mountain Casino for violating company policy—for not completing a required task. Sanchez  
26 testified that despite knowing that he was terminated, his statement on the Application was  
27 partially truthful in the sense that he did work “normal hours” at Club One. However, Sanchez  
28 did not want to disclose the termination because he was embarrassed by it and was under the

1 impression that Table Mountain Casino would not disclose the termination to third parties.  
2 Sanchez also testified that he felt the termination was not justified due to his length of service and  
3 the fact that another employee had violated the same policy and not been terminated.  
4 Additionally, Sanchez did not receive any termination-related paperwork in writing from Table  
5 Mountain Casino and so was uncertain if his separation was truly a “termination” because he was  
6 an at-will employee.

7 LEGAL CONCLUSIONS

8 15. The hearing on this matter “need not be conducted according to technical rules  
9 relating to evidence and witnesses. Any relevant evidence may be considered, and is sufficient in  
10 itself to support a finding, if it is the sort of evidence on which responsible persons are  
11 accustomed to rely in the conduct of serious affairs, regardless of the existence of any common  
12 law or statutory rule that might make improper the admission of that evidence over objection in a  
13 civil action.” (Bus. & Prof. Code, § 19871, subd. (a)(4); Cal. Code Regs., tit. 4, § 12060, subd.  
14 (g)(2).)

15 16. Division 1.5 of the Business and Professions Code, the provisions of which govern  
16 the denial of licenses on various grounds, does not apply to licensure decisions made by the  
17 Commission under the Gambling Control Act. (Bus. & Prof. Code, § 476, subd. (a).)

18 17. Public trust that permissible gambling will not endanger public health, safety, or  
19 welfare requires that comprehensive measures be enacted to ensure that gambling is free from  
20 criminal and corruptive elements, that it is conducted honestly and competitively, and that it is  
21 conducted in suitable locations. (Bus. & Prof. Code, § 19801, subd. (g).)

22 18. Public trust and confidence can only be maintained by strict and comprehensive  
23 regulation of all persons, locations, practices, associations, and activities related to the operation  
24 of lawful gambling establishments and the manufacture and distribution of permissible gambling  
25 equipment. (Bus. & Prof. Code, § 19801, subd. (h).)

26 19. The Commission has the responsibility of assuring that licenses, approvals, and  
27 permits are not issued to, or held by, unqualified or disqualified persons, or by persons whose  
28 operations are conducted in a manner that is inimical to the public health, safety, or welfare. (Bus.

1 & Prof. Code, § 19823, subd. (a)(1).)

2 20. An “unqualified person” means a person who is found to be unqualified pursuant to  
3 the criteria set forth in Section 19857, and “disqualified person” means a person who is found to  
4 be disqualified pursuant to the criteria set forth in Section 19859. (Bus. & Prof. Code, § 19823,  
5 subd. (b).)

6 21. The Commission has the power to deny any application for a license, permit, or  
7 approval for any cause deemed reasonable by the Commission. (Bus. & Prof. Code, § 19824,  
8 subd. (b).)

9 22. The Commission has the power to take actions deemed to be reasonable to ensure  
10 that no ineligible, unqualified, disqualified, or unsuitable persons are associated with controlled  
11 gambling activities. (Bus. & Prof. Code, § 19824, subd. (d).)

12 23. The burden of proving his or her qualifications to receive any license from the  
13 Commission is on the applicant. (Bus. & Prof. Code, § 19856, subd. (a); Cal. Code Regs., tit. 4, §  
14 12060, subd. (i).)

15 24. An application to receive a license constitutes a request for a determination of the  
16 applicant’s general character, integrity, and ability to participate in, engage in, or be associated  
17 with, controlled gambling. (Bus. & Prof. Code, § 19856, subd. (b).)

18 25. In reviewing an application for any license, the commission shall consider  
19 whether issuance of the license is inimical to public health, safety, or welfare, and whether  
20 issuance of the license will undermine public trust that the gambling operations with respect to  
21 which the license would be issued are free from criminal and dishonest elements and would be  
22 conducted honestly. (Bus. & Prof. Code, § 19856, subd. (c).)

23 26. No gambling license shall be issued unless, based on all of the information and  
24 documents submitted, the commission is satisfied that the applicant is a person of good character,  
25 honesty, and integrity. (Bus. & Prof. Code, § 19857, subd. (a).)

26 27. No gambling license shall be issued unless, based on all of the information and  
27 documents submitted, the commission is satisfied that the applicant is a person whose prior  
28 activities, criminal record, if any, reputation, habits, and associations do not pose a threat to the

1 public interest of this state, or to the effective regulation and control of controlled gambling, or  
2 create or enhance the dangers of unsuitable, unfair, or illegal practices, methods, and activities in  
3 the conduct of controlled gambling or in the carrying on of the business and financial  
4 arrangements incidental thereto. (Bus. & Prof. Code, § 19857, subd. (b).)

5 28. No gambling license shall be issued unless, based on all of the information and  
6 documents submitted, the commission is satisfied that the applicant is a person that is in all other  
7 respects qualified to be licensed as provided in this chapter. (Bus. & Prof. Code, § 19857, subd.  
8 (c).)

9 29. An application will be denied if the Commission finds that the applicant has not  
10 satisfied the requirements of Business and Professions Code section 19857. (Cal. Code Regs., tit.  
11 4, § 12040, subd. (a)(1).)

12 30. An applicant for licensing or for any approval or consent required by the Act,  
13 “shall make full and true disclosure of all information to the department and the commission as  
14 necessary to carry out the policies of this state relating to licensing, registration, and control of  
15 gambling.” (Bus. & Prof. Code, § 19866.)

16 31. The Bureau relies, in large part, on the applicant’s disclosures while conducting a  
17 background investigation. The failure to honestly and accurately disclose complete information in  
18 response to the Bureau’s inquiries subverts the Bureau’s efforts to conduct a thorough and  
19 complete investigation. (Bus. & Prof. Code, §§ 19826, subd. (a), 19866.)

20 32. Both the substance of an applicant’s disclosures, and the truthfulness and  
21 thoroughness of an applicant’s disclosures, are considered by the Bureau in making a  
22 recommendation as to the applicant’s suitability for licensure, and by the Commission in making  
23 a determination whether to approve or deny a license application. (Bus. & Prof. Code, §§ 19824,  
24 subd. (a) & (d), 19826, subd. (a), 19866.)

25 33. All of the information requested on the Application has been considered through  
26 the legislative and regulatory processes and determined necessary in order for the Commission to  
27 discharge its duties properly. An applicant is neither expected, nor permitted, to determine the  
28 importance of the information requested, and instead is required to provide full and complete

1 information as requested.

2 **ASSESSMENT OF SANCHEZ’S SUITABILITY FOR LICENSURE**

3 34. By not disclosing his termination from Table Mountain Casino, and the true reasons  
4 for it, the Bureau correctly assumes that Sanchez provided inaccurate and misleading information  
5 to the Bureau regarding the circumstances surrounding his termination and failed to disclose  
6 required information that is material to his Application. (Bus. & Prof. Code, §§ 19856, subd. (a),  
7 19857.) The parties’ exhibits do not include any information that corroborates Sanchez’s  
8 suggestion during the hearing that he may not have been terminated from Table Mountain Casino.  
9 In fact, Sanchez admits it was “wrong” for him to use the phrase “to work normal hours” on his  
10 Application to explain why he left his employment at Table Mountain Casino.

11 35. The reason provided by Sanchez on his Application for leaving employment at Table  
12 Mountain Casino was untrue and misleading because it implied that he voluntarily left his  
13 employment. While he may disagree with his employer’s decision to terminate him, Sanchez was  
14 still required to truthfully respond to the inquiry on the Application regarding his reasons for  
15 leaving his employment with Table Mountain Casino. (Bus. & Prof. Code, § 19866.)  
16 Accordingly, Sanchez’s failure to provide complete and accurate employment-related information  
17 to the Bureau in connection with his Application renders him unable to meet his burden of  
18 demonstrating that he is qualified to hold a third-party proposition player supervisor license. (Bus.  
19 & Prof. Code, § 19856, subd. (a); Cal. Code Regs., tit. 4, § 12060, subd. (i).)

20 36. Based on the foregoing, as Sanchez is unqualified for a third-party proposition player  
21 employee license, his registration number TPPL-026189 is void. (Cal. Code Regs., tit. 4, § 12122,  
22 subd. (d).)

23 37. Since Sanchez took responsibility for his failure to fully disclose the reasons for his  
24 termination from Table Mountain Casino on his Application, and because he did not have the  
25 benefit of referring to written termination-related documents since he did not receive it from  
26 Table Mountain Casino, he may reapply for a license from the Commission after the effective  
27 date of this Decision and Order.

28 38. All documentary and testimonial evidence submitted by the parties that is not

1 specifically addressed in this Decision and Order was considered but not used by the Commission  
2 in making its determination on Sanchez’s Application.

3 NOTICE OF APPLICANT’S APPEAL RIGHTS

4 Sanchez has the following appeal rights available under state law.

5 1. CCR section 12064, provides, in part:

6 (a) After the Commission issues a decision following a GCA hearing conducted  
7 pursuant to Section 12060, an applicant denied a license, permit, registration, or  
8 finding of suitability, or whose license, permit, registration, or finding of  
9 suitability has had conditions, restrictions, or limitations imposed upon it, may  
request reconsideration by the Commission. A request for reconsideration must  
be:

10 (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  
11 of receipt of the request; and,

12 (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,  
13 whichever is earlier.

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

15 (1) Newly discovered evidence or legal authorities that could not reasonably  
16 have been presented before the Commission’s issuance of the decision or at the  
hearing on the matter; or,

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

18  
19 2. Business and Professions Code section 19870, subdivision (f) provides:

20 A decision of the commission after an evidentiary hearing, denying a license or  
21 approval, or imposing any condition or restriction on the grant of a license or  
22 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  
23 any judicial proceeding held to consider that petition, 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.

24 3. CCR section 12066, subsection (c) provides:

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



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**ORDER**

- 1. VINCENT ANTHONY SANCHEZ’S Application for Third-Party Proposition Player Service License for Supervisor, Player or Other Employee is DENIED.
- 2. VINCENT ANTHONY SANCHEZ’s registration number TPPL-026189 is void.
- 3. VINCENT ANTHONY SANCHEZ is eligible to apply for a Commission-issued license or work permit immediately after the effective date of this Order.

This Order is effective on November 19, 2022.

Dated: 10/19/2022 Signature:   
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 Paula LaBrie, Chair

Dated: 10/19/2022 Signature:   
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 Cathleen Galgiani, Commissioner

Dated: 10/19/2022 Signature:   
7722F4571120449  
 William Liu, Commissioner