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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 Regarding:

ELENA DROUILLARD

Respondent.

BGC Case No. BGC-HQ2019-0004SL
CGCC Case No. CGCC-2019-0207-8A

DECISION AND ORDER

Hearing Date: July 24, 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 July 24, 2019.

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

Respondent Elena Drouillard (Drouillard) appeared on her own behalf.

During the evidentiary hearing, Presiding Officer Jason Pope took official notice of the Notice of Hearing and Prehearing Conference, with enclosures, sent by the Commission to Drouillard, Designated Agent Michelle Fernandez (DA Fernandez), and DAG Modha, via certified mail, on April 9, 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 Drouillard’s signed Notice of Defense.

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

- (1) Statement to Respondent; Statement of Reasons; Gambling Control Commission Letter dated April 9, 2019 re Notice of Hearing and Prehearing Conference w/out attachments; Business and Professions Code

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- sections 19870 and 19871; California Code of Regulations section 12060; and Declaration of Service by Certified Mail, Bates Nos. 0001-0024;
- (2) Application for Third-Party Proposition Player Services License Received May 22, 2017 by Bureau of Gambling Control and Supplemental Information, Bates Nos. 0025-0059;
 - (3) Bureau of Gambling Control’s Third-Party Supervisor Initial Background Investigation Report – Level III dated November 2018, Bates Nos. 0060-0069;
 - (4) Commission Memos and Letters: Gambling Control Commission’s Letter dated February 11, 2019 re Referral to Third-Party Proposition Player Services License to an Evidentiary Hearing for Elena Drouillard; Notice of Defense; California Gambling Control Commission Licensing Division Memorandum dated February 7, 2019 re: Initial Third-Party Proposition Player Services License Application; Email exchange dated February 6, 2019 with BCC Commissioners, Bates Nos. 0070-0079;
 - (5) Registration/License History, Bates No. 0080;
 - (6) Certification of Official Records signed February 14, 2019, Bates No. 0081;
 - (7) Copies of Certified Court Documents: Conviction Date: 09/30/2008; Case Number: CC812326; Letter dated November 28, 2017 sent to Santa Clara Superior Court requesting court records; Misdemeanor Complaint filed July 22, 2008; Court Minutes, Bates Nos. 0082-0086;
 - (8) Correspondence: DUI Declaration by Elena Drouillard; Letter dated November 2, 2018 to Michelle Fernandez, Designated Agent re Recommendation for Denial of Application for a Third-Party Provider of Proposition Player Services – Supervisor License; Letter dated November 27, 2018 to Michelle Fernandez, Designated Agent re: Notification of

- 1 Investigative Report, Bates Nos. 0087-0090;
- 2 (9) Casino M8trix/Team View Player Services Confidential Site Visit Report
- 3 from June 4, 2013, Bates Nos. 0091-0097;
- 4 (10) February 7, 2019 Commission Meeting Transcription, Bates Nos. 0098-
- 5 0101;
- 6 (11) Appointment of Designated Agent for Owners and Proposition Players
- 7 Form Received May 22, 2017, Bates No. 0102;
- 8 (12) Notice of Defense Received February 25, 2019, Bates Nos. 0103-0105; and
- 9 (13) June 19, 2019 Letter to Elena Del Carmen Drouillard regarding
- 10 supplemental disclosure and Casino M8trix/Team View Player Services
- 11 (TVPS) Site Visit on June 4, 2013, Bates Nos. 0106-0114.

12 During the evidentiary hearing, Presiding Officer Jason Pope also accepted into evidence

13 the following exhibits offered by Drouillard:

- 14 (A) Additional Information and/or Documentation Required. DOJ letter dated
- 15 July 24, 2018;
- 16 (B) Additional Information and/or documentation required (Due 08/3/2018)
- 17 email sent to HR on July 26, 2018 Containing attachments / statement for
- 18 review;
- 19 (C) Re: Additional Information and/or documentation required (Due
- 20 08/3/2018) July 31, 2018 email sent to HR seeking follow up;
- 21 (D) Text Message to HR sent August 2, 2018, containing New updated
- 22 statement;
- 23 (E) Transcribed Voicemail from HR. Received Aug. 3, 2018;
- 24 (F) Re: Additional Information and/or documentation required (Due
- 25 08/3/2018) Aug 3, 2018 email with new updated and signed statement;
- 26 (G) Team View Casino Master Log; and
- 27 (H) Team View Graveyard Shift Count.
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1 The record was closed and the matter was submitted on July 24, 2019.

2 FINDINGS OF FACT

3 **Procedural History**

4 1. On or about May 22, 2017, the Bureau received an Application for Third-Party
5 Proposition Player Services License for Supervisor and a Level II Supplemental Information form
6 (collectively, Application) from Drouillard.

7 2. On or about November 28, 2018, the Commission received a Third-Party Supervisor
8 Initial Background Investigation Report on Drouillard from the Bureau. In this report, the Bureau
9 recommends that the Commission deny Drouillard's Application.

10 3. At its February 7, 2019 meeting, the Commission voted to refer the consideration of
11 Drouillard's Application to a Gambling Control Act evidentiary hearing pursuant to CCR sections
12 12056(a) and 12060.

13 4. On or about February 21, 2019, Drouillard submitted a signed notice of defense
14 requesting an evidentiary hearing on the consideration of her Application.

15 5. On or about April 9, 2019, the Commission sent a Notice of Hearing, via certified
16 mail, to Drouillard, DA Fernandez, and DAG Modha.

17 6. On or about May 7, 2019, the Bureau sent a Statement of Reasons to Drouillard via
18 certified mail. The Commission received the Statement of Reasons from the Bureau on or about
19 May 8, 2019. In the Statement of Reasons, the Bureau recommends that the Commission deny
20 Drouillard's Application.

21 7. On or about June 12, 2019, the noticed Prehearing Conference was held before
22 Presiding Officer Jason Pope, Attorney III of the Commission. DAG Modha attended on behalf of
23 the Bureau. Drouillard attended on her own behalf.

24 8. On or about June 12, 2019, the Commission sent a Conclusion of Prehearing
25 Conference letter to Drouillard and DAG Modha.

26 9. The Commission heard this matter on July 24, 2019. The Bureau was represented
27 throughout the hearing by DAG Modha. Drouillard appeared on her own behalf.

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1 **Drouillard's Employment History in Controlled Gambling**

2 10. From approximately November 2008 to March 2010, Drouillard was employed by
3 Network Management Group, Inc., a third party provider of proposition player services, as a
4 Gaming Associate.

5 11. From approximately March 2010 to August 2014, Drouillard was employed by Team
6 View Player Services, LLC (Team View), a third party provider of proposition player services, as
7 a third party proposition player services player, and later as a supervisor.

8 12. From approximately August 2014 to March 2016, Drouillard was employed by PT
9 Gaming, LLC, a third party provider of proposition player services, as a third party proposition
10 player services supervisor.

11 13. From approximately March 2016 to the present, Drouillard has been employed by
12 Blackstone Gaming, LLC, a third party provider of proposition player services, as a third party
13 proposition player services supervisor under registration number TPSU-001328.

14 **Criminal History**

15 14. On or about September 30, 2008, Drouillard was convicted by the Santa Clara
16 Superior Court of violating California Vehicle Code section 23152(b), driving under the influence
17 of alcohol with a blood alcohol level of .08 percent or higher, a misdemeanor, in case number
18 CC812326. Drouillard was sentenced to six days in jail, three years of probation, and ordered to
19 complete a weekend work program, a three-month first offender DUI program, and pay a fine.
20 Drouillard disclosed the conviction on her Application.

21 15. Drouillard successfully completed the three-month first offender DUI program and the
22 terms of probation.

23 **The Site Visit at Casino M8trix**

24 16. On or about June 4, 2013, the Bureau conducted an unannounced site visit at Casino
25 M8trix, a gambling establishment located in San Jose, California. Team View personnel were
26 present at Casino M8trix during the site visit because they were performing third party
27 proposition player services.
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1 17. Drouillard was present and on duty during the June 4, 2013 site visit at Casino M8trix
2 and identified herself as a third party proposition player services supervisor for Team View.

3 18. As part of the site visit, the Bureau requested that Drouillard demonstrate the software
4 program utilized by Team View, which was called "Profitable Casino" (PC).

5 19. Drouillard showed Bureau staff various menu options in PC. However, Drouillard's
6 access was limited and various menu items lead to a blank screen.

7 20. Drouillard showed Bureau staff which employees have "clocked" in using the card
8 reader and which employees have not shown up for their shift. Drouillard also showed Bureau
9 staff which gaming tables were currently open on the gaming floor. The screen showing the
10 gaming tables displayed the following information: table number, game, starting amount, and
11 current table balance.

12 21. Bureau staff asked Drouillard whether PC currently tracks chip count and/or profit and
13 loss amounts. Drouillard responded "Oh that doesn't work." Bureau staff noticed that the profit
14 and loss amounts on each displayed table varied and asked Drouillard where the numbers came
15 from. Drouillard responded "I don't know. It doesn't work." Bureau staff stated that the amounts
16 must come from somewhere given that they are all different. Drouillard replied "I don't know."

17 22. During the site visit, Tim Gustin (Gustin), the owner of Team View, spoke with
18 Bureau staff on the telephone regarding PC. Bureau staff asked Gustin to explain how the profit
19 and loss amounts showed up on each gaming table. Gustin stated that every 2-4 hours the
20 supervisor on duty walks around the cardroom and does a count on each table, returns to the
21 office, and enters the information into PC. The supervisor also enters each deduction from the
22 podium. Gustin stated that as the supervisor on duty Drouillard would walk around the cardroom,
23 perform a count on each table, and enter the data into PC. During the evidentiary hearing,
24 Drouillard testified that she did not disagree with Gustin's statement regarding the procedure for
25 inputting the chip count into PC.

26 23. Carroll Lambert (Lambert), Human Resources Manager for Team View, arrived at
27 Casino M8trix shortly after the Bureau's telephone conversation with Gustin. While Lambert was
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1 present, Bureau staff again asked Drouillard about the profit and loss information she was
2 entering into PC. Drouillard confirmed that she went around to each table periodically and
3 performed a chip count on each table, which she then entered into PC. Bureau staff then asked
4 Drouillard to confirm that the profit and loss functionality of PC worked (which was inconsistent
5 with Drouillard’s prior statement that the profit and loss functionality did not work). Lambert
6 interrupted and stated that Drouillard “lied [about the profit and loss functionality not working]
7 because she was nervous and scared.” Drouillard did not refute Lambert’s statement that she lied
8 to Bureau staff.

9 **Drouillard’s Testimony during the Evidentiary Hearing Regarding the Site Visit and PC**

10 24. During the evidentiary hearing, Drouillard testified that she believed the profit and
11 loss information on PC did not work because the amounts did not match up with the figures she
12 wrote down on paper from her count on each gaming table. Drouillard testified that she did not
13 realize that PC was a 24 hour system and did not just keep track of the figures she entered during
14 her shift.

15 25. Drouillard also testified that she told Bureau staff that she did not know how the
16 information got into PC because she was unclear about the type of information that the Bureau
17 was referencing. Drouillard assumed that the Bureau was asking about the profit and loss data.
18 Drouillard testified that she did not enter profit and loss amounts; rather, she entered the chip
19 count from a review of the gaming tables. Drouillard later acknowledged that the chip count
20 reflects the profit and loss amounts on each gaming table.

21 26. Drouillard further testified that she did not respond to Lambert’s statement that she
22 lied to the Bureau because Lambert was management and leading the discussions with Bureau
23 staff.

24 **Drouillard’s Subsequent Communications with the Bureau Regarding the Site Visit and PC**

25 27. On or about July 26, 2018, Drouillard wrote to the Bureau “To the best of my
26 recollection, on June 4, 2013 all information I provided the bureau regarding the profitable casino
27 system was provided to me by Tim Gustin the owner and my employer at Team View Players.”
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1 28. On or about August 2, 2018, Drouillard wrote to the Bureau “I was unaware that I was
2 providing untrue and misleading information to the bureau. I was not nor am I familiar with the
3 profitable casino system that was used by team view player services, and any information I
4 provided to the bureau was that which had been conveyed to me by Tim Gustin my employer and
5 owner of Team View Players.”

6 29. During the evidentiary hearing, Drouillard testified that when the Bureau was asking
7 her about PC during its investigation of her application, she thought the Bureau was inquiring
8 about a scanning system at Garden City Casino, not the system at Casino M8trix. As a result,
9 Drouillard testified that her August 2, 2018 response to the Bureau referred to the Garden City
10 Casino system, not the PC system at Casino M8trix.

11 **Assessment of Drouillard’s Suitability for Licensure**

12 30. An applicant for licensing shall make full and true disclosure of all information to the
13 Bureau and Commission as necessary to carry out the policies of this state relating to licensing,
14 registration, and control of gambling.

15 31. The Bureau relies, in large part, on the applicant’s disclosures while conducting a
16 background investigation. The failure of an applicant to honestly and accurately disclose
17 information during the Bureau’s investigation subverts the Bureau’s efforts to conduct a
18 thorough and complete investigation.

19 32. The Bureau also expects and requires accurate and truthful information from cardroom
20 and third party proposition player services employees during its investigations and site visits.
21 The Commission relies upon the information provided by the Bureau to make appropriate
22 licensure decisions.

23 33. Both the substance of an applicant’s disclosures, and the truthfulness and
24 thoroughness of an applicant’s disclosures, are considered by the Bureau in making a
25 recommendation as to the applicant’s suitability for licensure, and by the Commission in making
26 a determination whether to approve or disapprove a license application.

27 34. An applicant’s recent employment history, and especially his or her history in
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1 controlled gambling, is material to the applicant’s qualifications for licensure. A negative
2 employment history, particularly one in controlled gambling, could demonstrate that the
3 applicant is unfit to work in the highly regulated industry of controlled gambling.

4 35. An applicant’s conduct while working in controlled gambling, including his or her
5 cooperation with the Bureau during its investigations and site visits, are material to the applicant’s
6 qualifications for licensure. Failing to cooperate with the Bureau by omitting or misrepresenting
7 facts surrounding the applicant’s role, responsibility, and conduct while working in controlled
8 gambling could demonstrate that the applicant is unfit to work in the highly regulated industry of
9 controlled gambling.

10 36. Drouillard failed to provide honest and accurate information requested by the Bureau
11 and provided untrue and misleading information to the Bureau during its June 4, 2013 site visit at
12 Casino M8trix as follows:

- 13 a. Bureau staff asked Drouillard whether PC currently tracks chip count and/or
14 profit and loss amounts. Drouillard failed to provide honest and accurate
15 information and provided untrue and misleading information by responding “It
16 doesn’t work,” even though it did. Lambert stated that Drouillard lied
17 regarding the profit and loss functionality of PC because she was scared and
18 nervous, which Drouillard did not refute.
- 19 b. When Bureau staff noticed that the profit and loss amounts on each displayed
20 table varied and asked Drouillard where the numbers came from, Drouillard
21 failed to provide honest and accurate information and provided untrue and
22 misleading information by responding “I don’t know. It doesn’t work.”
23 Drouillard knew where the information came from because she physically
24 walked around the cardroom, performed a count on each gaming table, and
25 entered the chip count information into PC.
- 26 c. When Bureau staff stated that the amounts on the gaming tables must come
27 from somewhere given that the amounts are all different, Drouillard failed to
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1 provide honest and accurate information and provided untrue and misleading
2 information by replying “I don’t know.” Again, Drouillard knew where the
3 information came from because she physically walked around the cardroom,
4 performed a count on each gaming table, and entered the chip count
5 information into PC. Additionally, during the evidentiary hearing Drouillard
6 acknowledged that the chip count information that she collected from the
7 gaming tables and entered into PC was reflected in the profit and loss amounts
8 on each gaming table.

9 37. Drouillard also failed to provide honest and accurate information requested by the
10 Bureau and provided untrue and misleading information to the Bureau in her August 2, 2018
11 written response to the Bureau. Drouillard wrote that she was unaware that she was providing
12 untrue and misleading information to the Bureau and that she was not and is not familiar with the
13 PC system used by Team View. However, during the June 4, 2013 site visit, Drouillard
14 demonstrated various functions of PC, including showing Bureau staff which employees have
15 “clocked” in using the card reader and which employees have not shown up for their shift, and
16 which gaming tables were currently open on the gaming floor. Drouillard also acknowledged
17 during the evidentiary hearing that she physically input the gaming table count information into
18 PC during her shifts.

19 38. Drouillard’s testimony that in 2018 when the Bureau was asking her about PC, she
20 thought the Bureau was inquiring about a scanning system at Garden City Casino fails to
21 convince. In her August 2, 2018 written response to the Bureau, Drouillard refers to the
22 “profitable casino system,” which is the name of the system used by Team View at Casino
23 M8trix. The primary focus of the Bureau’s background investigation of Drouillard was the June
24 4, 2013 site visit at Casino M8trix, which had nothing to do with Garden City Casino. Drouillard
25 never expressed any confusion or requested additional information during the Bureau’s inquiry of
26 her experience with PC. Further, there was no evidence presented that PC was used in both
27 Casino M8trix and Garden City Casino.
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1 39. As a result, by misrepresenting to the Bureau her understanding of PC, the
2 functionality of the profit and loss data in PC, and her role in inputting chip count data into PC,
3 Drouillard supplied untrue and misleading information as to material facts pertaining the
4 qualification criteria of an applicant for licensure by the Commission.

5 40. All documentary and testimonial evidence submitted by the parties that is not
6 specifically addressed in this Decision and Order was considered but not used by the Commission
7 in making its determination on Drouillard's Application.

8 41. The matter was submitted for Commission consideration on July 24, 2019.

9 LEGAL CONCLUSIONS

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

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

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

21 45. 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 46. The burden of proving his or her qualifications to receive any license from the
25 Commission is on the applicant. Business and Professions Code section 19856(a).

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

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

5 49. 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 of good character,
7 honesty, and integrity. Business and Professions Code section 19857(a).

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

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

19 52. The Commission shall deny a license to any applicant who is disqualified for failure of
20 the applicant to reveal any fact material to qualification, or the supplying of information that is
21 untrue or misleading as to a material fact pertaining to the qualification criteria. Business and
22 Professions Code section 19859(b).

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

27 54. A requester shall be ineligible for licensing [as a third party proposition player or
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1 supervisor] if the requester would be ineligible for a state gambling license under any of the
2 criteria set forth in Business and Professions Code section 19859, subdivisions (b), (e), or (f).
3 CCR section 12218.11(f).

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

7 56. An applicant shall be ineligible for registration [as a third party proposition player or
8 supervisor] if the applicant would be ineligible for a state gambling license under any of the
9 criteria set forth in Business and Professions Code section 19859, subdivisions (b), (e), or (f).
10 CCR section 12204(e).

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

13 58. Drouillard failed to provide honest and accurate information requested by the Bureau
14 during its June 4, 2013 site visit at Casino M8trix. As a result, Drouillard is disqualified from
15 licensure pursuant to Business and Professions Code section 19859(b).

16 59. Drouillard also supplied information that is untrue and misleading as to facts material
17 to the qualification criteria for licensure by the Commission by misrepresenting to the Bureau her
18 understanding of PC, the functionality of the profit and loss data in PC, and her role in inputting
19 chip count data into PC. Therefore, Drouillard is disqualified from licensure pursuant to Business
20 and Professions Code section 19859(b).

21 60. Given that Drouillard is disqualified from licensure pursuant to Business and
22 Professions Code section 19859(b), Drouillard is therefore ineligible for licensing as a third party
23 proposition supervisor pursuant to CCR section 12218.11(f) and ineligible for registration as a
24 third party proposition supervisor pursuant to CCR section 12204(e).

25 61. Based on the foregoing, Drouillard's Application is subject to denial pursuant to CCR
26 section 12218.11(f). As a result, Drouillard is ineligible for registration as a third party
27 proposition supervisor pursuant to CCR section 12204(d) and 12204(e). Therefore, Drouillard's
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1 third party proposition supervisor registration is subject to cancellation pursuant to CCR section
2 12205(a).

3 NOTICE OF APPLICANT’S APPEAL RIGHTS

4 Elena Drouillard has the following appeal rights available under state law:

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

6 An applicant denied a license, permit, registration, or finding of suitability,
7 or whose license, permit, registration, or finding of suitability has had
8 conditions, restrictions, or limitations imposed upon it, may request
9 reconsideration by the Commission within 30 calendar days of service of the
10 decision, or before the effective date specified in the decision, whichever is
11 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.

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

13 A decision of the commission denying a license or approval, or imposing
14 any condition or restriction on the grant of a license or approval may be
15 reviewed by petition pursuant to Section 1085 of the Code of Civil
16 Procedure. Section 1094.5 of the Code of Civil Procedure shall not apply to
17 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.

18 CCR section 12066, subsection (c) provides:

19 A decision of the Commission denying an application or imposing conditions on
20 license shall be subject to judicial review as provided in Business and Professions
21 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.

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ORDER

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2 1. Elena Drouillard's Application for Third-Party Proposition Player Services License for
3 Supervisor is DENIED.

4 2. Elena Drouillard's Third Party Proposition Player Services Supervisor Registration
5 Number TPSU-001328 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 September 30, 2019.

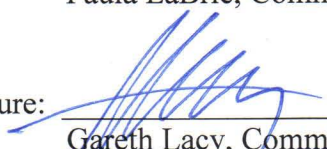
9
10 Dated: 8/29/19

Signature: 
Jim Evans, Chairman


11
12 Dated: 8/29/19

Signature: 
Paula LaBrie, Commissioner

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14 Dated: 8/29/19

Signature: 
Gareth Lacy, Commissioner

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16 Dated: 8/29/19

Signature: 
Trang To, Commissioner