

BEFORE THE  
CALIFORNIA GAMBLING CONTROL COMMISSION

In the Matter of the Application for a Third-Party Proposition Player Services Worker License Regarding:  
  
TERI LYNN HALL  
  
Applicant.

CGCC Case No. CGCC-2022-0106-7C  
BGC Case No. BGC-HQ2022-00001SL

**DECISION AND ORDER**

Hearing Date: August 18, 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, and held via Zoom video conference, on August 18, 2022.

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

Terri Hall (Hall) appeared on her own behalf without representation.

During the evidentiary hearing, Presiding Officer Russell Johnson took official notice of the following: Notice and Agenda of Commission Hearing; the Commission’s Conclusion of Prehearing Conference letter; the Commission’s Notice of Hearing with two attachments: (1) Application for Third-Party Proposition Player Services Worker License and (2) the Bureau’s Background Investigation Report; the Bureau’s Statement of Reasons; and Hall’s signed Notice of Defense.

During the evidentiary hearing, the Presiding Officer accepted into evidence Exhibits 1 through 11 offered by the Bureau, which contain bates numbering BGC002 to BGC131, with a Table of Contents that separately identifies each document.

The record was closed and the matter was submitted on August 18, 2022.

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**FINDINGS OF FACT**

**Procedural History**

1. Hall has been employed by L.E. Gaming, a licensed third-party proposition player services provider, since approximately April 2021.

2. Hall submitted an initial Application for Employee Category License and a Commission Work Permit or TPPPS Worker: Supplemental Information form (collectively referred to as “Application”) to the Bureau on or about April 8, 2021.

3. The Commission issued Hall a Third-Party Proposition Player Worker Temporary License, number TPWK-000758, on April 13, 2021.

4. On October 28, 2021, Bureau staff met with Hall by phone to inform her generally of the basis of the Bureau’s recommendation to deny her Application.

5. On or about October 28, 2021, the Bureau issued its Third-Party Worker Initial Background Investigation Report, Level III, in which it recommended that the Commission deny Hall’s Application.

6. On January 6, 2022, the Commission referred consideration of the Application to an evidentiary hearing to be conducted as a Gambling Control Act hearing pursuant to California Code of Regulations, Title 4, Division 18, Chapter 1, section 12060.

7. On or about February 2, 2022, Hall submitted a Notice of Defense form to the Commission requesting an evidentiary hearing on the consideration of her Application.

8. On March 1, 2022, a Notice of Hearing was sent to Hall and DAG Waian stating that an evidentiary hearing would be held before the Commission by means of video conferencing using Zoom on August 18, 2022, and a prehearing conference would be held on June 29, 2022.

9. On or about July 6, 2022, the Commission received the Bureau’s Statement of Reasons, wherein it requested that the Commission deny the Application based on allegations that Hall provided untrue or misleading information regarding her employment history on the Application and is unsuitable for licensure due to a misdemeanor conviction.

10. On June 29, 2022, the noticed Prehearing Conference was held before the Presiding Officer. DAG Waian attended on behalf of the Bureau. Hall attended on her own behalf

1 without representation.

2 **Hall's Employment History in Controlled Gambling**

3 11. Hall worked at the Thunder Valley Casino Resort (Thunder Valley) as a Blackjack  
4 Dealer beginning in April 2018, until June 2019.

5 12. During the course of the Bureau's background investigation, it was determined  
6 that Hall's separation from employment with Thunder Valley was involuntary.

7 13. Hall began working for L.E. Gaming, Inc. (LE Gaming) in April 2021 as a Third  
8 Party Worker and was still employed in that position at the time of the hearing.

9 **Hall's Criminal History**

10 14. On August 26, 2020, the Sacramento County Superior Court convicted Hall of  
11 violating Vehicle Code section 23152, subdivision (b), driving under the influence (DUI) with a  
12 blood alcohol level of .08 percent or higher, a misdemeanor. Hall was sentenced to two days in  
13 jail, three years of probation, ordered to complete a First Offender program, and was given the  
14 option to pay a fine or serve an additional four days in jail.

15 15. Hall disclosed the conviction on her Application.

16 16. On September 15, 2021, the Bureau contacted the court and was informed that  
17 Hall had completed the First Offender program and satisfied all fines.

18 17. The Bureau also offered as an exhibit, a Notice of Completion Certificate showing  
19 that Hall enrolled in the Bridges DUI Program on October 22, 2020 and completed the program  
20 on February 24, 2021.

21 18. Hall testified that the DUI occurred when she was pulled over for running a red  
22 light and a breathalyzer test revealed that she had alcohol in her system. Hall testified that she  
23 satisfied all requirements and fines and has had no other convictions.

24 **Failure to Disclose Termination from Thunder Valley**

25 19. The Application required Hall to identify each place of employment for the past  
26 ten years, and for each, to indicate her reason for leaving, and if terminated, explain the  
27 circumstances. Hall wrote on the Application that her reason for leaving employment at Thunder  
28 Valley was "full time job offer."

1           20.     As part of the Bureau’s background investigation, a request for employment  
2 verification was submitted to Thunder Valley. The request asked five questions regarding Hall’s  
3 prior employment, including whether her separation was involuntary or voluntary and whether  
4 there was any derogatory employment or licensing information to report.

5           21.     On August 17, 2021, a Licensing and Investigations Manager from the United  
6 Auburn Indian Community Tribal Gaming Agency responded to the Bureau’s inquiry, as follows:

7                   1. Dates Employed (month/year to month/year): 04/2018 – 06/2019

8                   2. Position Held: Dealer

9                   3. Was Hall’s separation voluntary or involuntary? If involuntary, please provide  
10 details: Involuntary (Attendance)

11                   4. Is there any derogatory employment or licensing information to report?: No

12                   5. Is Hall eligible to be rehired/relicensed?: After review by TVCR HR and  
13 background investigation

14           22.     On August 20, 2021, during the course of the Bureau’s background investigation,  
15 the Bureau notified Hall that Thunder Valley verified her prior employment, but reported that she  
16 was terminated due to attendance. Hall was asked to provide a detailed statement explaining the  
17 circumstances that led to her termination and the reason that she did not disclose that she was  
18 terminated from Thunder Valley on the Application.

19           23.     On October 12, 2021, Hall provided a written statement to the Bureau explaining  
20 the circumstances leading to her separation from Thunder Valley. Hall wrote:

21                   “I apologize that I didn’t disclose that I was let go from Thunder Valley. I was  
22 starting my new job and I tried to handle both jobs. It started to collide with my  
23 new jobs work schedule and I figured out I was incapable of making it into thunder  
24 valley due to late hours and my new jobs early hours. I didn’t give them a two  
25 week notice I called into work which caused me to ‘point out’ or let go due to  
26 attendance. I have grown to understand that 2 week notices are important for  
27 employees to give their employers.”

28           24.     Hall testified that she worked part-time at Thunder Valley. In June 2020, Hall  
began working full time during the week at Volt/Pegatron. Hall’s supervisor initially was willing

1 to accommodate her work schedule at Volt/Pegatron by only scheduling her to work weekends at  
2 Thunder Valley. However, due to a staffing change, Hall began working under a different  
3 supervisor who would not accommodate her schedule. Hall was faced with a scheduling conflict  
4 where she had to choose between the full-time position at Volt/Pegatron and the part-time  
5 position at Thunder Valley.

6 25. Hall testified that she decided not to continue working at Thunder Valley so that  
7 she could continue in the full-time position. Hall called Thunder Valley's attendance line to leave  
8 a message stating that she would not be at work that day. Hall testified that upon leaving that  
9 message on the attendance line, she knew that she would no longer work at Thunder Valley  
10 because she would be "pointed out."

11 26. Hall testified that Thunder Valley utilized a point system where employees would  
12 be terminated upon receipt of 12 points. When Hall called the attendance line for the final time,  
13 she had 11 points on her record and knew that she would accrue 2 more points for the "call out."  
14 Hall testified that she understood that having 13 points on her record would mean that she was  
15 pointed out and would "no longer have a job there."

16 27. Hall testified that when she wrote on the Application that the reason for her  
17 separation from employment with Thunder Valley was due to a "full time job offer," she  
18 considered that to be an accurate response. Hall testified that she did not intend to hide the  
19 circumstances surrounding her separation from the Bureau. Hall also testified that she was  
20 embarrassed and regretful of the fact that she did not give Thunder Valley a written two-week  
21 notice and she felt that disclosing that she left that employment by pointing-out would "look  
22 bad."

23 28. Hall testified that prior to learning that the Bureau considered her to have been  
24 terminated by Thunder Valley, she did not know exactly how to characterize her separation from  
25 employment. After Hall left a message on the attendance line stating that she was not coming to  
26 work that day, she believed that she was no longer employed at Thunder Valley. Hall received a  
27 final paycheck by direct deposit, but she never received a letter or other information from  
28 Thunder Valley stating that she was terminated.



1           36. 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 whose prior  
3 activities, criminal record, if any, reputation, habits, and associations do not pose a threat to the  
4 public interest of this state, or to the effective regulation and control of controlled gambling, or  
5 create or enhance the dangers of unsuitable, unfair, or illegal practices, methods, and activities in  
6 the conduct of controlled gambling or in the carrying on of the business and financial  
7 arrangements incidental thereto. Business and Professions Code section 19857(b).

8           37. An application for a license will be denied if the Commission finds that the applicant  
9 has not satisfied the requirements of Business and Professions Code section 19859. CCR section  
10 12040(a)(1).

11           38. The Commission shall deny a license to any applicant who is disqualified for failure  
12 of the applicant to provide information, documentation, and assurances required by this chapter or  
13 requested by the chief, or failure of the applicant to reveal any fact material to qualification, or the  
14 supplying of information that is untrue or misleading as to a material fact pertaining to the  
15 qualification criteria. Business and Professions Code section 19859(b).

16           **Assessment of Hall's Suitability for Licensure**

17           39. The Commission does not believe that Hall's DUI conviction indicates she lacks  
18 the requisite honesty, character, and integrity required for licensure. The DUI is Hall's only  
19 criminal conviction and she expeditiously satisfied all conditions of her sentence. Therefore, Hall  
20 has met her burden of proving that she is a person of good character, honesty, and integrity. As a  
21 result, Hall is qualified for licensure pursuant to Business and Professions Code section 19857,  
22 subdivision (a).

23           40. The Commission is also satisfied that Hall is a person whose criminal record does  
24 not pose a threat to the public interest of this state, or to the effective regulation and control of  
25 controlled gambling, or create or enhance the dangers of unsuitable, unfair, or illegal practices,  
26 methods, and activities in the conduct of controlled gambling or in the carrying on of the business  
27 and financial arrangements incidental thereto. As a result, Hall is qualified for licensure pursuant  
28 to Business and Professions Code section 19857, subdivision (b).



1           41.     The Commission also finds that Hall is not disqualified from licensure based on  
2 her disclosure on the Application that she left employment at Thunder Valley for a full-time  
3 position. Hall’s explanation was true in that she made a conscious decision not to work at  
4 Thunder Valley any longer because the schedule conflicted with her newer full-time position.  
5 Hall chose the full-time position over the part-time one by leaving a message on the attendance  
6 line stating that she was not coming to work and she understood that she was no longer going to  
7 work at Thunder Valley after leaving the message.

8           42.     Based on the evidence presented, it is unclear whether Hall was in fact  
9 “terminated,” as the Bureau alleges, which would have required her to indicate “yes” and explain  
10 the circumstances of the termination on the Application. Thunder Valley did not characterize the  
11 separation as a “termination” on the employment verification form and indicated that there is no  
12 derogatory employment history to report and that Hall is eligible for rehire. Hall testified that in  
13 her more recent discussions with Thunder Valley, she was told her separation from employment  
14 was considered a “job abandonment.” The only written communication Hall received that  
15 characterized her separation as a termination was from the Bureau. Further, Hall provided  
16 additional information to the Bureau when requested describing the exact circumstances of her  
17 separation from employment with Thunder Valley. Given these circumstances, Hall’s testimony  
18 is credible that she believed the information she provided on the Application was truthful, and  
19 that she did not intend to withhold information, or provide misleading or untruthful information to  
20 the Bureau.

21           43.     Based on the foregoing, Hall has also met her burden of proving that her  
22 characterization on the Application that she left her employment with Thunder Valley for a full-  
23 time position was not based on an intent to conceal information, or provide untrue or misleading  
24 information to the Bureau. As a result, Hall is not disqualified from licensure pursuant to  
25 Business and Professions Code section 19859, subdivision (b).

26           44.     All documentary and testimonial evidence submitted by the parties that is not  
27 specifically addressed in this Decision and Order was considered but not used by the Commission  
28 in making its determination on Hall’s Application.



**ORDER**

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1. Hall’s Application for a Third-Party Proposition Player Services Worker License is APPROVED.

2. No costs are awarded.

3. Each side to pay its own attorneys’ fees.

This Order is effective on September 26, 2022.

Dated: 9/26/2022  
Signature:   
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Paula LaBrie, Chair

Dated: 9/26/2022  
Signature:   
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Cathleen Galgiani, Commissioner

Dated: 9/26/2022  
Signature:   
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Eric Heins, Commissioner

Dated: 9/26/2022  
Signature:   
7722F4571120449...  
William Liu, Commissioner

Dated: 9/26/2022  
Signature:   
14B4AD3B90F8462...  
Edward Yee, Commissioner